

ORDER NO. *E17-83*

STATE OF NEW JERSEY
DEPARTMENT OF BANKING AND INSURANCE

IN THE MATTER OF:

Proceedings by the Commissioner)
of Banking and Insurance, State)
of New Jersey, to fine, suspend,)
and/or revoke the insurance)
producer licenses of Weiran)
Dobrek, Reference No. 1003574,)
and Atlantic Bail Bonds, Inc.,)
Reference No. 1005337.)

**FINAL ORDER AS TO
WEIRAN DOBREK AND ATLANTIC
BAIL BONDS, INC.**

TO: Weiran Dobrek
64 Copperleaf Drive
Newtown, PA 18940

Atlantic Bail Bonds, Inc.
82 High Street
Mount Holly, NJ 08060

This matter, having been opened by Richard J. Badolato, Commissioner, New Jersey Department of Banking and Insurance ("Commissioner"), upon information that Weiran Dobrek ("Dobrek") and Atlantic Bail Bonds, Inc. ("Atlantic Bail Bonds") (collectively, "Respondents"), may have violated various provisions of the insurance laws of the State of New Jersey; and

WHEREAS, Dobrek was a licensed resident insurance producer in the State of New Jersey, pursuant to N.J.S.A.

17:22A-32a, until her license was revoked on January 15, 2015 by Final Decision and Order of the Commissioner No. E15-09; and

WHEREAS, Atlantic Bail Bonds was a licensed business entity insurance producer in the State of New Jersey pursuant to N.J.S.A. 17:22A-32b, until its license was rendered inactive, pursuant to N.J.A.C. 11:17-2.12(d), on January 15, 2015; and

WHEREAS, prior to the revocation of her license, Dobrek was the Designated Responsible Licensed Producer ("DRLP") and responsible for the activities of Atlantic Bail Bonds, and responsible for Atlantic Bail Bonds' compliance with the insurance laws, pursuant to N.J.S.A. 17:22A-32b(2); and

WHEREAS, Respondents are subject to the provisions of the New Jersey Insurance Producer Licensing Act of 2001, N.J.S.A. 17:22A-26 et seq. ("Producer Act"), the Producer Licensing regulations, N.J.A.C. 11:17-1.1 et seq. and the regulations governing Insurance Producer Standards of Conduct, N.J.A.C. 11:17A-1.1 et seq. and N.J.A.C. 11:17D-1.1 et seq.; and

WHEREAS, pursuant to N.J.S.A. 17:22A-29, a person shall not sell, solicit or negotiate insurance in this State unless the person is licensed for that line of authority in accordance with the Producer Act; and

WHEREAS, pursuant to N.J.S.A. 17:22A-40a(2), an insurance producer shall not violate any insurance law,

regulation, subpoena, or order of the Commissioner or of another State's insurance regulator; and

WHEREAS, pursuant to N.J.S.A. 17:22A-40a(7), an insurance producer shall not admit or be found to have committed any insurance unfair trade practice or fraud; and

WHEREAS, pursuant to N.J.S.A. 17:22A-40a(8), an insurance producer shall not use fraudulent, coercive or dishonest practices, or demonstrate incompetence, untrustworthiness or financial irresponsibility in the conduct of insurance business in this State or elsewhere; and

WHEREAS, pursuant to N.J.S.A. 17:22A-40a(16), an insurance producer shall not commit any fraudulent act; and

WHEREAS, pursuant to N.J.A.C. 11:17A-1.6(c), licensed partners, officers and directors, and all owners with an ownership interest of 10 percent or more in the organization shall be held responsible for all insurance related conduct of the organization licensee, any of its branch offices, its other licensed officers or partners, and its employees; and

WHEREAS, pursuant to N.J.A.C. 11:17-2.12(d), departure, termination or deletion of licensee officers, directors, partners, or designated responsible producers, which leaves a business entity insurance producer with no licensed officers, directors, partners, or designated responsible producers, or with officers, directors, partners, or designated

responsible producers who do not have like authorities as the business entity producer, shall make the business entity producer license inactive; and

WHEREAS, pursuant to N.J.A.C. 11:17D-2.5(e), no person whose license has been suspended or revoked may be a partner, officer, director or owner of a licensed business entity, or otherwise be employed in any capacity by an insurance producer; and

WHEREAS, pursuant to N.J.A.C. 11:17D-2.1(a)1, before imposing an administrative penalty, the Department shall direct a notice by certified mail or personal delivery to the last known business or mailing address of the alleged violator, which notice shall include a reference to the statute, rule and/or administrative order alleged to be violated, a concise statement of the facts alleged to constitute the violation, a statement of the administrative penalty or penalties sought to be imposed, and a statement advising the alleged violator of the right to a hearing and the procedure for requesting a hearing; and

WHEREAS, pursuant to N.J.A.C. 11:17D-2.1(a)3, the notice shall be served by personal delivery, or by certified mail, to the alleged violator's last known business or mailing address, according to the files maintained by the Department, and service in this manner shall be considered lawful service on the alleged violator; and

WHEREAS, on September 16, 2016, the Commissioner issued Order to Show Cause No. E16-88, alleging violations of New Jersey insurance laws by Dobrek and Atlantic Bail Bonds as set forth in the following Counts:

COUNT 1

IT APPEARING, that prior to revocation on January 15, 2015, Respondent Dobrek was the sole DRLP and owner of Respondent Atlantic Bail Bonds; and

IT FURTHER APPEARING, that as of January 15, 2015, by operation of N.J.A.C. 11:17-2.12(d), Respondent Atlantic Bail Bonds was no longer an active insurance producer in this State because Atlantic Bail Bonds was without a licensed insurance producer as a DRLP or owner; and

IT FURTHER APPEARING, that on or about January 21, 2015, Respondents received a copy of Final Decision and Order of the Commissioner No. E15-09 and notification that Respondent Dobrek's New Jersey insurance producer license was revoked on January 15, 2015; and

IT FURTHER APPEARING, that on or about March 12, 2015, Respondents issued a \$2,500.00 bail bond in New Jersey on behalf of Roche Surety and Casualty Co., Inc. ("Roche"), with a Power of Attorney No. AA14-191080 for consumer "BS"; and

IT FURTHER APPEARING, that on or about March 12, 2015, Respondents issued a \$500.00 bail bond in New Jersey on behalf of Roche, with a Power of Attorney No. AA15-234449 for consumer "RC"; and

IT FURTHER APPEARING, that on or about March 17, 2015, Respondents issued a \$300.00 bail bond in New Jersey on behalf of Roche, with a Power of Attorney No. AA15-234438 for consumer "LR"; and

IT FURTHER APPEARING, that on or about March 17, 2015, Respondents issued a \$1,500.00 bail bond in New Jersey on behalf of Roche, with a Power of Attorney No. AA15-234454 for consumer "LR"; and

IT FURTHER APPEARING, that these four instance[s], where Respondents sold four insurance products at a time when Dobrek was not licensed as an insurance producer in this State, and Atlantic Bail Bonds' license was inactive, constitute[~~s~~] four

violations of N.J.S.A. 17:22A-29, N.J.S.A. 17:22A-40a(2), and (8); and

COUNT 2

IT FURTHER APPEARING, that Respondent Atlantic Bail Bonds continued to conduct insurance business in this State without a DRLP, in violation of N.J.S.A. 17:22A-32b(2), N.J.S.A. 17:22A-40a(2), and (8), N.J.A.C. 11:17D-2.5(e); and

WHEREAS, as set forth in the Certification of Service of Deputy Attorney General Anita Bittner, attached hereto as Exhibit A, Dobrek and Atlantic Bail Bonds were given notice of the aforesaid charges and an opportunity to contest the charges at a hearing pursuant to Order to Show Cause No. E16-88, which was duly served by certified and regular mail upon Dobrek and Atlantic Bail Bonds at their last known business or mailing addresses, according to files maintained by the Department, in accordance with N.J.A.C. 11:17D-2.1(a)3; and

WHEREAS, Dobrek and Atlantic Bail Bonds failed to provide written responses to the charges contained in Order to Show Cause No. E16-88 within 20 days as provided by N.J.A.C. 11:17D-2.1(d)1, and therefore Dobrek and Atlantic Bail Bonds have waived their right to a hearing to contest these charges and the charges are deemed admitted, pursuant to N.J.A.C. 11:17D-2.1(b)1;

NOW, THEREFORE, IT IS on this 29th day of AUGUST ,

2017

ORDERED, that the charges contained in Count 1 and Count 2 of Order to Show Cause No. E16-88 are deemed admitted by Dobrek and Atlantic Bail Bonds, pursuant to N.J.A.C. 11:17D-2.1(b)1; and

IT IS FURTHER ORDERED, that pursuant to N.J.S.A. 17:22A-40, and N.J.A.C. 11:17D-2.1(b)2, the business entity insurance producer license of Atlantic Bail Bonds is hereby **REVOKED** effective upon the execution of this Final Order; and

IT IS FURTHER ORDERED, that pursuant to N.J.S.A. 17:22A-45c, Dobrek and Atlantic Bail Bonds shall be liable for the payment of civil penalties for violations of the Producer Act as follows:

Count 1: Dobrek and Atlantic Bail Bonds shall pay civil penalties in the amount of \$35,000.00, jointly and severally, for selling four insurance products at a time when Dobrek was not licensed as an insurance producer in this State, and Atlantic Bail Bonds' license was inactive; and

Count 2: Atlantic Bail Bonds shall pay civil penalties in the amount of \$10,000.00, individually, for continuing to conduct insurance business in this State without a DRLP; and

IT IS FURTHER ORDERED, that pursuant to N.J.S.A. 17:22A-45c and N.J.A.C. 11:1-32.4(b)20, Dobrek and Atlantic Bail Bonds shall reimburse the Department, jointly and severally, for the costs associated with the investigation of the matter

totaling \$1,500.00, as evidenced by the Certification of Costs by Investigator Eugene Shannon, attached hereto as Exhibit B; and

IT IS FURTHER ORDERED, that Dobrek and Atlantic Bail Bonds shall pay in full the above fines and costs totaling \$36,500.00 by remitting payment to the Commissioner of Banking and Insurance, State of New Jersey, 20 West State Street, P.O. Box 329, Trenton, New Jersey 08625, Attention: Virgil Downtin, Chief of Investigations by certified check, cashier's check or money order made payable to the "State of New Jersey, General Treasury," within ten (10) days from the date of service of this Order; and

IT IS FURTHER ORDERED, that Atlantic Bail Bonds shall additionally individually pay in full the above fine of \$10,000.00 by remitting payment to the Commissioner of Banking and Insurance, State of New Jersey, 20 West State Street, P.O. Box 329, Trenton, New Jersey 08625, Attention: Virgil Downtin, Chief of Investigations by certified check, cashier's check or money order made payable to the "State of New Jersey, General Treasury," within ten (10) days from the date of service of this Order; and

IT IS FURTHER ORDERED, that in the event full payment of the fines and costs is not made, the Commissioner may exercise any and all remedies available by law, including but

not limited to recovery of any unpaid penalties, in accordance with the Penalty Enforcement Law of 1999, N.J.S.A. 2A:58-10 et seq.; and

IT IS FURTHER ORDERED, that the fines in this Final Order are imposed pursuant to the police powers of the State of New Jersey for the enforcement of the law and the protection of the public health, safety and welfare, and are not intended to constitute debts which may be limited or discharged in a bankruptcy proceeding; and

IT IS FURTHER ORDERED, that the provisions of this Final Order represent a final agency decision and constitute a final resolution of the allegations contained in Order to Show Cause No. E16-88 as to Dobrek and Atlantic Bail Bonds.



Peter L. Hartt
Director of Insurance

EXHIBIT A

CHRISTOPHER S. PORRINO
ATTORNEY GENERAL OF NEW JERSEY
Attorney for Petitioner
Richard J. Hughes Justice Complex
25 Market Street
P. O. Box 117
Trenton, New Jersey 08625

By: Anita Bittner
Deputy Attorney General
NJ Attorney ID: 154622015
(609) 943-5626
Anita.Bittner@law.njoag.gov

STATE OF NEW JERSEY
DEPARTMENT OF BANKING AND INSURANCE

Proceedings by the Commissioner)
of Banking and Insurance, State)
of New Jersey, to fine, suspend,)
and/or revoke the insurance)
producer licenses of Weiran)
Dobrek, Reference No. 1003574,)
and Atlantic Bail Bonds, Inc.,)
Reference No. 1005337.)

CERTIFICATION OF
DEPUTY ATTORNEY GENERAL
ANITA BITTNER

I, Anita Bittner, of full age, do of my own personal knowledge make the following statements by way of certification in lieu of affidavit pursuant to R. 1:4-4(b):

1. I am a Deputy Attorney General assigned as counsel for the New Jersey Department of Banking and Insurance ("Department") in the above matter. I submit this certification in support of the Department's request that a Final Order be entered against Weiran Dobrek ("Dobrek") and Atlantic Bail

Bonds, Inc. (collectively, the "Respondents"), and specifically to establish that proper service of Order to Show Cause No. E16-88 was made upon the Respondents.

2. The Commissioner of the Department issued Order to Show Cause No. E16-88 on September 16, 2016.

3. By letters dated September 21, 2016, my office served a copy of Order to Show Cause No. E16-88 on the Respondents via regular and certified mail, return receipt requested, at the following last known addresses for the Respondents on file with the Department: Weiran Dobrek, 64 Copperleaf Drive, Newton, PA 18940 and Atlantic Bail Bonds, Inc., 82 High Street, Mount Holly, NJ 08060. Attached as Exhibit 1 is a true and correct copy of the September 21, 2016 letters and Order to Show Cause E16-88.

4. The regular mail to Atlantic Bail Bonds, Inc. was not returned to this office.

5. The certified mail to Atlantic Bail Bonds, Inc. was delivered to Atlantic Bail Bonds, Inc. on September 24, 2016 and signed for and accepted for delivery. Attached as Exhibit 2 is a true and correct copy of the signed Certified Mail Return Receipt.

6. The regular mail to Dobrek was not returned to this office.

7. The certified mail to Dobrek was returned as

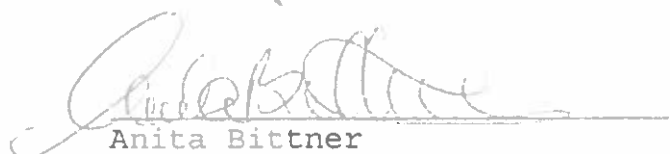
"unclaimed/unable to forward".

8. Respondents did not respond to Order to Show Cause No. E16-88 within the 20 days provided by N.J.A.C. 11:17D-2.1(d)1.

9. Pursuant to N.J.A.C. 11:17D-2.1(a)3, service of the Order to Show Cause in this manner constitutes lawful service upon Respondent.

10. To date, Respondents have not filed an answer nor requested a hearing to contest the allegations set forth in Order to Show Cause No. E16-88.

I certify that the foregoing statements made by me are true. I am aware that if any of the foregoing statements made by me are willfully false, I am subject to punishment.


Anita Bittner
Deputy Attorney General

Dated: 5/11/17

EXHIBIT 1



CHRIS CHRISTIE
Governor

KIM GUADAGNO
Lt. Governor

State of New Jersey
OFFICE OF THE ATTORNEY GENERAL
DEPARTMENT OF LAW AND PUBLIC SAFETY
DIVISION OF LAW
25 MARKET STREET
PO Box 117
TRENTON NJ 08625-0117

CHRISTOPHER S. PORRINO
Attorney General

MICHELLE L. MILLER
Acting Director

September 21, 2016

Via Regular and Certified Mail

Weiran Dobrek
64 Copperleaf Drive
Newtown, PA 18940

Dear Ms. Dobrek:

We represent the New Jersey Department of Banking and Insurance ("Department"). Enclosed, please find Order to Show Cause No. E16-88 issued by the Director of Insurance on September 16, 2016. The Order to Show Cause charges you and Atlantic Bail Bonds, Inc. with various violations of the insurance laws and regulations of the State of New Jersey, and orders you and Atlantic Bail Bonds, Inc. to appear and show cause as to why your insurance producer licenses should not be suspended or revoked, and why other administrative fines and costs should not be imposed against you and Atlantic Bail Bonds, Inc.

You have the right to request an administrative hearing in regard to these allegations. Complete instructions on how to request a hearing are contained within the enclosed Order to Show Cause. Briefly here, a request for hearing must provide a specific statement responding to each charge alleged in the Order to Show Cause, specifically admit or deny each fact alleged in the Order to Show Cause, identify any facts of which you have no specific knowledge, and identify any defenses intended to be asserted in response to each charge. N.J.A.C. 11:17D-2.1(d). The request for hearing must be received by the Department within twenty (20) days of service of the Order to



Show Cause upon you. The request for hearing should be sent to: Virgil Downtin, Chief of Investigations, Department of Banking and Insurance, P.O. Box 329, Trenton, New Jersey 08625; or, faxed to Mr. Downtin's attention at (609) 292-5337, with a copy to me. If you fail to respond to this Order to Show Cause within the time provided, a Final Order will be issued by the Commissioner.

Thank you for your attention to this matter.

Sincerely yours,

CHRISTOPHER S. PORRINO
ATTORNEY GENERAL OF NEW JERSEY

By: 
Anita Bittner
Deputy Attorney General

Encls.

ORDER TO SHOW CAUSE NO. E16-88

STATE OF NEW JERSEY
DEPARTMENT OF BANKING AND INSURANCE

IN THE MATTER OF:

Proceedings by the Commissioner)
of Banking and Insurance, State)
of New Jersey, to fine,)
suspend, and/or revoke the)
insurance producer licenses of)
Weiran Dobrek, Reference No.)
1003574, and Atlantic Bail)
Bonds, Inc., Reference No.)
1005337.)

ORDER TO SHOW CAUSE

TO: Weiran Dobrek
64 Copperleaf Drive
Newtown, PA 18940

Atlantic Bail Bonds, Inc.
82 High Street
Mount Holly, NJ 08060

THIS MATTER, having been opened by the Commissioner of Banking and Insurance ("Commissioner"), State of New Jersey, upon information that Weiran Dobrek ("Dobrek") and Atlantic Bail Bonds, Inc. (collectively, the "Respondents"), may have violated various provisions of the insurance laws of the State of New Jersey; and

WHEREAS, Respondent Dobrek was a licensed resident insurance producer in the State of New Jersey, pursuant to N.J.S.A. 17:22A-32, until revocation of her license on January

15, 2015 by Final Decision and Order of the Commissioner No. E15-09; and

WHEREAS, Respondent Atlantic Bail Bonds was a licensed business entity insurance producer in the State of New Jersey pursuant to N.J.S.A. 17:22A-32, until its license became inactive, pursuant to N.J.A.C. 11:17-2.12(d), on January 15, 2015; and

WHEREAS, the Respondents are subject to the provisions of the New Jersey Insurance Producer Licensing Act ("Producer Act"), N.J.S.A. 17:22A-26, et seq., the regulations governing Producer Licensing, N.J.A.C. 11:17-1.1 et seq., and the regulations governing Insurance Producer Standards of Conduct, N.J.A.C. 11:17A-1.1 et seq. and N.J.A.C. 11:17D-1.1 et seq.; and

WHEREAS, pursuant to N.J.S.A. 17:22A-40d, the Commissioner shall retain the authority to enforce the provisions of and impose any penalty or remedy authorized by the Producer Act and Title 17 of the New Jersey Statutes against any person who is under investigation for or charged with a violation of the Producer Act or Title 17 of the New Jersey Statutes even if the person's license or registration has been surrendered or has lapsed by operation of law; and

WHEREAS, Respondent Dobrek was the Designated Responsible Licensed Producer ("DRLP") and responsible for the activities of Respondent Atlantic Bail Bonds, and responsible for Atlantic

Bail Bonds' compliance with the insurance laws, pursuant to N.J.S.A. 17:22A-32b(2); and

WHEREAS, pursuant to N.J.A.C. 11:17A-1.6(c), licensed partners, officers and directors, and all owners with an ownership interest of 10 percent or more in the organization shall be held responsible for all insurance related conduct of the organization licensee, any of its branch offices, its other licensed officers or partners, and its employees; and

WHEREAS, pursuant to N.J.S.A. 17:22A-29, a "person" means an individual or a business entity; and

WHEREAS, pursuant to N.J.S.A. 17:22A-29, a person shall not sell, solicit or negotiate insurance in this State unless the person is licensed for that line of authority in accordance with the Producer Act; and

WHEREAS, pursuant to N.J.S.A. 17:22A-40a(2), an insurance producer shall not violate any insurance law, regulation, subpoena, or order of the Commissioner; and

WHEREAS, pursuant to N.J.S.A. 17:22A-40a(8), an insurance producer shall not use fraudulent, coercive or dishonest practices, or demonstrate incompetence, untrustworthiness or financial irresponsibility in the conduct of the insurance business; and

WHEREAS, pursuant to N.J.S.A. 17:22A-32b(2), any business entity acting as an insurance producer is required to designate

at least one DRLP responsible for the entity's compliance with the insurance laws, rules, and regulations; and

WHEREAS, pursuant to N.J.A.C. 11:17-2.12(d), departure, termination or deletion of licensee officers, directors or partners, which leaves a business entity insurance producer with no licensed officers, directors or partners or with officers, directors or partners who do not have like authorities as the business entity producer, shall make the business entity producer license inactive; and

WHEREAS, pursuant to N.J.A.C. 11:17D-2.5(e), no person whose license has been suspended or revoked may be a partner, officer, director or owner of a licensed business entity, or otherwise be employed in any capacity by an insurance producer; and

WHEREAS, pursuant to Final Decision and Order of the Commissioner No. E15-09, Respondent Dobrek's New Jersey insurance producer license was revoked on January 15, 2015; and

WHEREAS, Final Decision and Order of the Commissioner No. E15-09 assessed against Respondent Dobrek civil penalties for violations of the Producer Act; and

COUNT 1

IT APPEARING, that prior to revocation on January 15, 2015, Respondent Dobrek was the sole DRLP and owner of Respondent Atlantic Bail Bonds; and

IT FURTHER APPEARING, that as of January 15, 2015, by operation of N.J.A.C. 11:17-2.12(d), Respondent Atlantic Bail Bonds was no longer an active insurance producer in this State because Atlantic Bail Bonds was without a licensed insurance producer as a DRLP or owner; and

IT FURTHER APPEARING, that on or about January 21, 2015, Respondents received a copy of Final Decision and Order of the Commissioner No. E15-09 and notification that Respondent Dobrek's New Jersey insurance producer license was revoked on January 15, 2015; and

IT FURTHER APPEARING, that on or about March 12, 2015, Respondents issued a \$2,500.00 bail bond in New Jersey on behalf of Roche Surety and Casualty Co., Inc. ("Roche"), with a Power of Attorney No. AA14-191080 for consumer "BS"; and

IT FURTHER APPEARING, that on or about March 12, 2015, Respondents issued a \$500.00 bail bond in New Jersey on behalf of Roche, with a Power of Attorney No. AA15-234449 for consumer "RC"; and

IT FURTHER APPEARING, that on or about March 17, 2015, Respondents issued a \$300.00 bail bond in New Jersey on behalf of Roche, with a Power of Attorney No. AA15-234438 for consumer "LR"; and

IT FURTHER APPEARING, that on or about March 17, 2015, Respondents issued a \$1,500.00 bail bond in New Jersey on behalf

of Roche, with a Power of Attorney No. AA15-234454 for consumer "LR"; and

IT FURTHER APPEARING, that these four instance, where Respondents sold four insurance products at a time when Dobrek was not licensed as an insurance producer in this State, and Atlantic Bail Bonds' license was inactive, constitutes four violations of N.J.S.A. 17:22A-29, N.J.S.A. 17:22A-40a(2), and (8); and

COUNT 2

IT FURTHER APPEARING, that Respondent Atlantic Bail Bonds continued to conduct insurance business in this State without a DRLP, in violation of N.J.S.A. 17:22A-32b(2), N.J.S.A. 17:22A-40a(2), and (8), N.J.A.C. 11:17D-2.5(e); and

NOW, THEREFORE, IT IS on this 16th day of September, 2016

ORDERED, that pursuant to the provisions of N.J.S.A. 17:22A-40a, that Respondent Dobrek, as the sole Designated Responsible Licensed Producer and owner of Atlantic Bail Bonds, shall appear and show cause why Atlantic Bail Bonds' business entity insurance producer license shall not be revoked by the Commissioner; and

IT IS FURTHER ORDERED, that Respondents shall appear and show cause why the Commissioner should not assess fines up to \$5,000.00 for the first violation and not exceeding \$10,000.00 for each subsequent violation of the Producer Act, pursuant to

the provisions of N.J.S.A. 17:22A-45c, due to Respondents' failure to comply with New Jersey's insurance laws and regulations; and


IT IS FURTHER ORDERED, that Respondents shall appear and show cause why they should not be subject to additional penalties, including restitution to their victims and reimbursement of the costs of investigation and prosecution by the Department of Banking and Insurance, pursuant to N.J.S.A. 17:22A-45c; and

IT IS PROVIDED, that Respondents have the right to request an administrative hearing, to be represented by counsel or other qualified representative, at their own expense, to take testimony, to call or cross-examine witnesses, to have subpoena and subpoena duces tecum issued and to present evidence or argument if a hearing is requested; and

IT IS FURTHER PROVIDED, that unless a request for a hearing is received within twenty days of the service of this Order to Show Cause, the right to a hearing in this matter shall be deemed to have been waived by the Respondents and the Commissioner shall dispose of this matter in accordance with law. A hearing may be requested by mailing the request to Virgil Downtin, Chief of Investigations, New Jersey Department of Banking and Insurance, P.O. Box 329, Trenton, N.J. 08625 or by

faxing the request to the Department at (609) 292-5337. The request shall contain:

- (A) The licensee's name, address, and daytime telephone number;
- (B) A statement referring to each charge alleged in this Order to Show Cause and identifying any defense intended to be asserted in response to each charge. Where the defense relies on facts not contained in the Order to Show Cause, those specific facts must be stated;
- (C) A specific admission or denial of each fact alleged in this Order to Show Cause. Where the Respondents have no specific knowledge regarding a fact alleged in this Order to Show Cause, a statement to that effect must be contained in the hearing request. Allegations of this Order to Show Cause not answered in the manner set forth above shall be deemed to have been admitted; and
- (D) A statement requesting a hearing.



Peter L. Hartt
Director of Insurance



CHRIS CHRISTIE
Governor

KIM GUADAGNO
Lt. Governor

State of New Jersey
OFFICE OF THE ATTORNEY GENERAL
DEPARTMENT OF LAW AND PUBLIC SAFETY
DIVISION OF LAW
25 MARKET STREET
PO BOX 117
TRENTON, NJ 08625-0117

CHRISTOPHER S. PORRINO
Attorney General

MICHELLE L. MILLER
Acting Director

September 21, 2016

Via Regular and Certified Mail

Atlantic Bail Bonds, Inc.
82 High Street
Mount Holly, NJ 08060

Dear Atlantic Bail Bonds, Inc.:

We represent the New Jersey Department of Banking and Insurance ("Department"). Enclosed, please find Order to Show Cause No. E16-88 issued by the Director of Insurance on September 16, 2016. The Order to Show Cause charges Atlantic Bail Bonds, Inc. and Weiran Dobrek with various violations of the insurance laws and regulations of the State of New Jersey, and orders Atlantic Bail Bonds, Inc. and Weiran Dobrek to appear and show cause as to why your insurance producer licenses should not be suspended or revoked, and why other administrative fines and costs should not be imposed against Atlantic Bail Bonds, Inc. and Weiran Dobrek.

You have the right to request an administrative hearing in regard to these allegations. Complete instructions on how to request a hearing are contained within the enclosed Order to Show Cause. Briefly here, a request for hearing must provide a specific statement responding to each charge alleged in the Order to Show Cause, specifically admit or deny each fact alleged in the Order to Show Cause, identify any facts of which you have no specific knowledge, and identify any defenses intended to be asserted in response to each charge. N.J.A.C. 11:17D-2.1(d). The request for hearing must be received by the Department within twenty (20) days of service of the Order to



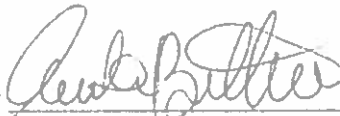
Show Cause upon you. The request for hearing should be sent to: Virgil Downtin, Chief of Investigations, Department of Banking and Insurance, P.O. Box 329, Trenton, New Jersey 08625; or, faxed to Mr. Downtin's attention at (609) 292-5337, with a copy to me. If you fail to respond to this Order to Show Cause within the time provided, a Final Order will be issued by the Commissioner.

Thank you for your attention to this matter.

Sincerely yours,

CHRISTOPHER S. PORRINO
ATTORNEY GENERAL OF NEW JERSEY

By:



Anita Bittner

Deputy Attorney General

Encls.

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Mount Holly, NJ 08060

THIS MATTER, having been opened by the Commissioner of Banking and Insurance ("Commissioner"), State of New Jersey, upon information that Weiran Dobrek ("Dobrek") and Atlantic Bail Bonds, Inc. (collectively, the "Respondents"), may have violated various provisions of the insurance laws of the State of New Jersey; and

WHEREAS, Respondent Dobrek was a licensed resident insurance producer in the State of New Jersey, pursuant to N.J.S.A. 17:22A-32, until revocation of her license on January

15, 2015 by Final Decision and Order of the Commissioner No. E15-09; and

WHEREAS, Respondent Atlantic Bail Bonds was a licensed business entity insurance producer in the State of New Jersey pursuant to N.J.S.A. 17:22A-32, until its license became inactive, pursuant to N.J.A.C. 11:17-2.12(d), on January 15, 2015; and

WHEREAS, the Respondents are subject to the provisions of the New Jersey Insurance Producer Licensing Act ("Producer Act"), N.J.S.A. 17:22A-26, et seq., the regulations governing Producer Licensing, N.J.A.C. 11:17-1.1 et seq., and the regulations governing Insurance Producer Standards of Conduct, N.J.A.C. 11:17A-1.1 et seq. and N.J.A.C. 11:17D-1.1 et seq.; and

WHEREAS, pursuant to N.J.S.A. 17:22A-40d, the Commissioner shall retain the authority to enforce the provisions of and impose any penalty or remedy authorized by the Producer Act and Title 17 of the New Jersey Statutes against any person who is under investigation for or charged with a violation of the Producer Act or Title 17 of the New Jersey Statutes even if the person's license or registration has been surrendered or has lapsed by operation of law; and

WHEREAS, Respondent Dobrek was the Designated Responsible Licensed Producer ("DRLP") and responsible for the activities of Respondent Atlantic Bail Bonds, and responsible for Atlantic

Bail Bonds' compliance with the insurance laws, pursuant to N.J.S.A. 17:22A-32b(2); and

WHEREAS, pursuant to N.J.A.C. 11:17A-1.6(c), licensed partners, officers and directors, and all owners with an ownership interest of 10 percent or more in the organization shall be held responsible for all insurance related conduct of the organization licensee, any of its branch offices, its other licensed officers or partners, and its employees; and

WHEREAS, pursuant to N.J.S.A. 17:22A-29, a "person" means an individual or a business entity; and

WHEREAS, pursuant to N.J.S.A. 17:22A-29, a person shall not sell, solicit or negotiate insurance in this State unless the person is licensed for that line of authority in accordance with the Producer Act; and

WHEREAS, pursuant to N.J.S.A. 17:22A-40a(2), an insurance producer shall not violate any insurance law, regulation, subpoena, or order of the Commissioner; and

WHEREAS, pursuant to N.J.S.A. 17:22A-40a(8), an insurance producer shall not use fraudulent, coercive or dishonest practices, or demonstrate incompetence, untrustworthiness or financial irresponsibility in the conduct of the insurance business; and

WHEREAS, pursuant to N.J.S.A. 17:22A-32b(2), any business entity acting as an insurance producer is required to designate

at least one DRLP responsible for the entity's compliance with the insurance laws, rules, and regulations; and

WHEREAS, pursuant to N.J.A.C. 11:17-2.12(d), departure, termination or deletion of licensee officers, directors or partners, which leaves a business entity insurance producer with no licensed officers, directors or partners or with officers, directors or partners who do not have like authorities as the business entity producer, shall make the business entity producer license inactive; and

WHEREAS, pursuant to N.J.A.C. 11:17D-2.5(e), no person whose license has been suspended or revoked may be a partner, officer, director or owner of a licensed business entity, or otherwise be employed in any capacity by an insurance producer; and

WHEREAS, pursuant to Final Decision and Order of the Commissioner No. E15-09, Respondent Dobrek's New Jersey insurance producer license was revoked on January 15, 2015; and

WHEREAS, Final Decision and Order of the Commissioner No. E15-09 assessed against Respondent Dobrek civil penalties for violations of the Producer Act; and

COUNT 1

IT APPEARING, that prior to revocation on January 15, 2015, Respondent Dobrek was the sole DRLP and owner of Respondent Atlantic Bail Bonds; and

IT FURTHER APPEARING, that as of January 15, 2015, by operation of N.J.A.C. 11:17-2.12(d), Respondent Atlantic Bail Bonds was no longer an active insurance producer in this State because Atlantic Bail Bonds was without a licensed insurance producer as a DRLP or owner; and

IT FURTHER APPEARING, that on or about January 21, 2015, Respondents received a copy of Final Decision and Order of the Commissioner No. E15-09 and notification that Respondent Dobrek's New Jersey insurance producer license was revoked on January 15, 2015; and

IT FURTHER APPEARING, that on or about March 12, 2015, Respondents issued a \$2,500.00 bail bond in New Jersey on behalf of Roche Surety and Casualty Co., Inc. ("Roche"), with a Power of Attorney No. AA14-191080 for consumer "BS"; and

IT FURTHER APPEARING, that on or about March 12, 2015, Respondents issued a \$500.00 bail bond in New Jersey on behalf of Roche, with a Power of Attorney No. AA15-234449 for consumer "RC"; and

IT FURTHER APPEARING, that on or about March 17, 2015, Respondents issued a \$300.00 bail bond in New Jersey on behalf of Roche, with a Power of Attorney No. AA15-234438 for consumer "LR"; and

IT FURTHER APPEARING, that on or about March 17, 2015, Respondents issued a \$1,500.00 bail bond in New Jersey on behalf

of Roche, with a Power of Attorney No. AA13-234454 for consumer
"LR"; and

IT FURTHER APPEARING, that these four instance, where
Respondents sold four insurance products at a time when Dobrek
was not licensed as an insurance producer in this State, and
Atlantic Bail Bonds' license was inactive, constitutes four
violations of N.J.S.A. 17:22A-29, N.J.S.A. 17:22A-40a(2), and
(8); and

COUNT 2

IT FURTHER APPEARING, that Respondent Atlantic Bail Bonds
continued to conduct insurance business in this State without a
DRLP, in violation of N.J.S.A. 17:22A-32b(2), N.J.S.A. 17:22A-
40a(2), and (8), N.J.A.C. 11:17D-2.5(e); and

NOW, THEREFORE, IT IS on this 16th day of September, 2016

ORDERED, that pursuant to the provisions of N.J.S.A.
17:22A-40a, that Respondent Dobrek, as the sole Designated
Responsible Licensed Producer and owner of Atlantic Bail Bonds,
shall appear and show cause why Atlantic Bail Bonds' business
entity insurance producer license shall not be revoked by the
Commissioner; and

IT IS FURTHER ORDERED, that Respondents shall appear and
show cause why the Commissioner should not assess fines up to
\$5,000.00 for the first violation and not exceeding \$10,000.00
for each subsequent violation of the Producer Act, pursuant to

the provisions of N.J.S.A. 17:22A-45c, due to Respondents' failure to comply with New Jersey's insurance laws and regulations; and

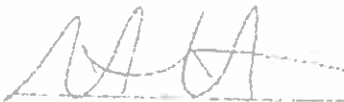
IT IS FURTHER ORDERED, that Respondents shall appear and show cause why they should not be subject to additional penalties, including restitution to their victims and reimbursement of the costs of investigation and prosecution by the Department of Banking and Insurance, pursuant to N.J.S.A. 17:22A-45c; and

IT IS PROVIDED, that Respondents have the right to request an administrative hearing, to be represented by counsel or other qualified representative, at their own expense, to take testimony, to call or cross-examine witnesses, to have subpoena and subpoena duces tecum issued and to present evidence or argument if a hearing is requested; and

IT IS FURTHER PROVIDED, that unless a request for a hearing is received within twenty days of the service of this Order to Show Cause, the right to a hearing in this matter shall be deemed to have been waived by the Respondents and the Commissioner shall dispose of this matter in accordance with law. A hearing may be requested by mailing the request to Virgil Downtin, Chief of Investigations, New Jersey Department of Banking and Insurance, P.O. Box 329, Trenton, N.J. 08625 or by

faxing the request to the Department at (609) 292-5337. The request shall contain:

- (A) The licensee's name, address, and daytime telephone number;
- (B) A statement referring to each charge alleged in this Order to Show Cause and identifying any defense intended to be asserted in response to each charge. Where the defense relies on facts not contained in the Order to Show Cause, those specific facts must be stated;
- (C) A specific admission or denial of each fact alleged in this Order to Show Cause. Where the Respondents have no specific knowledge regarding a fact alleged in this Order to Show Cause, a statement to that effect must be contained in the hearing request. Allegations of this Order to Show Cause not answered in the manner set forth above shall be deemed to have been admitted; and
- (D) A statement requesting a hearing.



Peter L. Hartt
Director of Insurance

EXHIBIT 2

SENDER: COMPLETE THIS SECTION

- Complete items 1, 2, and 3.
- Print your name and address on the reverse so that we can return the card to you.
- Attach this card to the back of the mailpiece, or on the front if space permits.

1. Article Addressed to:

9590 9403 0385 5163 0107 31

2. Article Number (Transfer from service label)
7013 0600 0001 4596 2949

COMPLETE THIS SECTION ON DELIVERY

A. Signature [Signature] Agent
 Addressee

B. Received by (Printed Name) _____
 C. Date of Delivery 4/24/16 Yes No

D. Is delivery address different from item 1? Yes No
 If YES, enter delivery address below: _____

3. Service Type

- Priority Mail Express®
- Registered Mail™
- Registered Mail Restricted Delivery
- Certified Mail®
- Certified Mail Restricted Delivery
- Return Receipt for Merchandise
- Collect on Delivery, Restricted Delivery
- Signature Confirmation™
- Signature Confirmation Restricted Delivery
- Insured Mail™ (over \$500)

PS Form 3811, April 2015 PSN 7530-02-000-9053

Domestic Return Receipt

EXHIBIT B

EXHIBIT B

Proceedings by the Commissioner)
of Banking and Insurance, State)
of New Jersey, to fine,)
suspend, and/or revoke the)
insurance producer licenses of)
Weiran Dobrek, Reference No.)
1003574, and Atlantic Bail)
Bonds, Inc., Reference No.)
1005337.

CERTIFICATION OF COSTS
BY INVESTIGATOR
EUGENE SHANNON

I, Eugene Shannon, of full age, do of my own personal knowledge make the following statements by way of certification in lieu of affidavit pursuant to R. 1:4-4(b):

1. I am an investigator with the New Jersey Department of Banking and Insurance, Division of Insurance, and Consumer Protection Services, Enforcement ("Department").

2. This certification is submitted in support of the Department's application for reimbursement of its costs of investigation and prosecution, in accordance with N.J.S.A. 17:22A-45(c).

3. On or about March 27, 2015, I was assigned responsibility for conducting an investigation to determine whether Weiran Dobrek and Atlantic Bail Bonds, Inc., may have violated certain provisions of the New Jersey Producer Licensing Act of 2001, N.J.S.A. 17:22A-26, et seq., and related insurance

regulations.

4. To determine the amount of time that I spent in the investigation and prosecution of this matter, I reviewed my files relative to this matter, including my time records. On the basis of this review, I have prepared the below schedule of costs:

Date	Time in Hours	Phone	Case Prep	Comments
3/27/2015	4.5	X	X	Review complaint documents, identify respondents, check licensing Interview Dobrek
4/16/2015	1.0	X	X	Call Roche Surety
4/16/2015	1		X	Investigation Report
4/21/2015	5.0	X	X	Interviews with Dobrek and Attorney
8/30/2015-12/10/2015	3.0	X		Consultations with DAGs
5/19/2015	3.5		X	F&E preparation
6/30/2015	2		X	Review Dobrek Appeals Court decision
3/27/2015-5/8/2016	7.0		X	Various email correspondence
9/10/2016	2		X	Review OTSC

11/25/2016	1		X	Prepare schedule of costs
TOTAL:	Hours 30	@ \$50/hour		TOTAL COST: \$1,500.00

5. As this schedule reflects, the investigative efforts expended by the Department of Insurance concerning this matter total 30 hours. Pursuant to N.J.A.C. 11:1-32.4(b)20, costs to the Department for the investigation and prosecution for violations of the New Jersey Insurance Producer Licensing Act, N.J.S.A. 17:22A-40, are reimbursable at the rate of \$50.00 per hour, rounded to the nearest quarter hour.

6. I therefore request that the Department's costs of investigation and prosecution be reimbursed in the amount of \$1,500.00.

I certify that the foregoing statements made by me are true. I am aware that if any of the foregoing statements are willfully false, I am subject to punishment.


 Eugene Shannon

Dated: 8/11/2017

ORDER TO SHOW CAUSE NO. E16-88

STATE OF NEW JERSEY
DEPARTMENT OF BANKING AND INSURANCE

IN THE MATTER OF:

Proceedings by the Commissioner)
of Banking and Insurance, State)
of New Jersey, to fine,)
suspend, and/or revoke the)
insurance producer licenses of)
Weiran Dobrek, Reference No.)
1003574, and Atlantic Bail)
Bonds, Inc., Reference No.)
1005337.)

ORDER TO SHOW CAUSE

TO: Weiran Dobrek
64 Copperleaf Drive
Newtown, PA 18940

Atlantic Bail Bonds, Inc.
82 High Street
Mount Holly, NJ 08060

THIS MATTER, having been opened by the Commissioner of Banking and Insurance ("Commissioner"), State of New Jersey, upon information that Weiran Dobrek ("Dobrek") and Atlantic Bail Bonds, Inc. (collectively, the "Respondents"), may have violated various provisions of the insurance laws of the State of New Jersey; and

WHEREAS, Respondent Dobrek was a licensed resident insurance producer in the State of New Jersey, pursuant to N.J.S.A. 17:22A-32, until revocation of her license on January

15, 2015 by Final Decision and Order of the Commissioner No. E15-09; and

WHEREAS, Respondent Atlantic Bail Bonds was a licensed business entity insurance producer in the State of New Jersey pursuant to N.J.S.A. 17:22A-32, until its license became inactive, pursuant to N.J.A.C. 11:17-2.12(d), on January 15, 2015; and

WHEREAS, the Respondents are subject to the provisions of the New Jersey Insurance Producer Licensing Act ("Producer Act"), N.J.S.A. 17:22A-26, et seq., the regulations governing Producer Licensing, N.J.A.C. 11:17-1.1 et seq., and the regulations governing Insurance Producer Standards of Conduct, N.J.A.C. 11:17A-1.1 et seq. and N.J.A.C. 11:17D-1.1 et seq.; and

WHEREAS, pursuant to N.J.S.A. 17:22A-40d, the Commissioner shall retain the authority to enforce the provisions of and impose any penalty or remedy authorized by the Producer Act and Title 17 of the New Jersey Statutes against any person who is under investigation for or charged with a violation of the Producer Act or Title 17 of the New Jersey Statutes even if the person's license or registration has been surrendered or has lapsed by operation of law; and

WHEREAS, Respondent Dobrek was the Designated Responsible Licensed Producer ("DRLP") and responsible for the activities of Respondent Atlantic Bail Bonds, and responsible for Atlantic

Bail Bonds' compliance with the insurance laws, pursuant to N.J.S.A. 17:22A-32b(2); and

WHEREAS, pursuant to N.J.A.C. 11:17A-1.6(c), licensed partners, officers and directors, and all owners with an ownership interest of 10 percent or more in the organization shall be held responsible for all insurance related conduct of the organization licensee, any of its branch offices, its other licensed officers or partners, and its employees; and

WHEREAS, pursuant to N.J.S.A. 17:22A-29, a "person" means an individual or a business entity; and

WHEREAS, pursuant to N.J.S.A. 17:22A-29, a person shall not sell, solicit or negotiate insurance in this State unless the person is licensed for that line of authority in accordance with the Producer Act; and

WHEREAS, pursuant to N.J.S.A. 17:22A-40a(2), an insurance producer shall not violate any insurance law, regulation, subpoena, or order of the Commissioner; and

WHEREAS, pursuant to N.J.S.A. 17:22A-40a(8), an insurance producer shall not use fraudulent, coercive or dishonest practices, or demonstrate incompetence, untrustworthiness or financial irresponsibility in the conduct of the insurance business; and

WHEREAS, pursuant to N.J.S.A. 17:22A-32b(2), any business entity acting as an insurance producer is required to designate

at least one DRLP responsible for the entity's compliance with the insurance laws, rules, and regulations; and

WHEREAS, pursuant to N.J.A.C. 11:17-2.12(d), departure, termination or deletion of licensee officers, directors or partners, which leaves a business entity insurance producer with no licensed officers, directors or partners or with officers, directors or partners who do not have like authorities as the business entity producer, shall make the business entity producer license inactive; and

WHEREAS, pursuant to N.J.A.C. 11:17D-2.5(e), no person whose license has been suspended or revoked may be a partner, officer, director or owner of a licensed business entity, or otherwise be employed in any capacity by an insurance producer; and

WHEREAS, pursuant to Final Decision and Order of the Commissioner No. E15-09, Respondent Dobrek's New Jersey insurance producer license was revoked on January 15, 2015; and

WHEREAS, Final Decision and Order of the Commissioner No. E15-09 assessed against Respondent Dobrek civil penalties for violations of the Producer Act; and

COUNT 1

IT APPEARING, that prior to revocation on January 15, 2015, Respondent Dobrek was the sole DRLP and owner of Respondent Atlantic Bail Bonds; and

IT FURTHER APPEARING, that as of January 15, 2015, by operation of N.J.A.C. 11:17-2.12(d), Respondent Atlantic Bail Bonds was no longer an active insurance producer in this State because Atlantic Bail Bonds was without a licensed insurance producer as a DRLP or owner; and

IT FURTHER APPEARING, that on or about January 21, 2015, Respondents received a copy of Final Decision and Order of the Commissioner No. E15-09 and notification that Respondent Dobrek's New Jersey insurance producer license was revoked on January 15, 2015; and

IT FURTHER APPEARING, that on or about March 12, 2015, Respondents issued a \$2,500.00 bail bond in New Jersey on behalf of Roche Surety and Casualty Co., Inc. ("Roche"), with a Power of Attorney No. AA14-191080 for consumer "BS"; and

IT FURTHER APPEARING, that on or about March 12, 2015, Respondents issued a \$500.00 bail bond in New Jersey on behalf of Roche, with a Power of Attorney No. AA15-234449 for consumer "RC"; and

IT FURTHER APPEARING, that on or about March 17, 2015, Respondents issued a \$300.00 bail bond in New Jersey on behalf of Roche, with a Power of Attorney No. AA15-234438 for consumer "LR"; and

IT FURTHER APPEARING, that on or about March 17, 2015, Respondents issued a \$1,500.00 bail bond in New Jersey on behalf

of Roche, with a Power of Attorney No. AA15-234454 for consumer "LR"; and

IT FURTHER APPEARING, that these four instance, where Respondents sold four insurance products at a time when Dobrek was not licensed as an insurance producer in this State, and Atlantic Bail Bonds' license was inactive, constitutes four violations of N.J.S.A. 17:22A-29, N.J.S.A. 17:22A-40a(2), and (8); and

COUNT 2

IT FURTHER APPEARING, that Respondent Atlantic Bail Bonds continued to conduct insurance business in this State without a DRLP, in violation of N.J.S.A. 17:22A-32b(2), N.J.S.A. 17:22A-40a(2), and (8), N.J.A.C. 11:17D-2.5(e); and

NOW, THEREFORE, IT IS on this 16th day of September, 2016

ORDERED, that pursuant to the provisions of N.J.S.A. 17:22A-40a, that Respondent Dobrek, as the sole Designated Responsible Licensed Producer and owner of Atlantic Bail Bonds, shall appear and show cause why Atlantic Bail Bonds' business entity insurance producer license shall not be revoked by the Commissioner; and

IT IS FURTHER ORDERED, that Respondents shall appear and show cause why the Commissioner should not assess fines up to \$5,000.00 for the first violation and not exceeding \$10,000.00 for each subsequent violation of the Producer Act, pursuant to

the provisions of N.J.S.A. 17:22A-45c, due to Respondents' failure to comply with New Jersey's insurance laws and regulations; and

IT IS FURTHER ORDERED, that Respondents shall appear and show cause why they should not be subject to additional penalties, including restitution to their victims and reimbursement of the costs of investigation and prosecution by the Department of Banking and Insurance, pursuant to N.J.S.A. 17:22A-45c; and

IT IS PROVIDED, that Respondents have the right to request an administrative hearing, to be represented by counsel or other qualified representative, at their own expense, to take testimony, to call or cross-examine witnesses, to have subpoena and subpoena duces tecum issued and to present evidence or argument if a hearing is requested; and

IT IS FURTHER PROVIDED, that unless a request for a hearing is received within twenty days of the service of this Order to Show Cause, the right to a hearing in this matter shall be deemed to have been waived by the Respondents and the Commissioner shall dispose of this matter in accordance with law. A hearing may be requested by mailing the request to Virgil Downtin, Chief of Investigations, New Jersey Department of Banking and Insurance, P.O. Box 329, Trenton, N.J. 08625 or by

faxing the request to the Department at (609) 292-5337. The request shall contain:

- (A) The licensee's name, address, and daytime telephone number;
- (B) A statement referring to each charge alleged in this Order to Show Cause and identifying any defense intended to be asserted in response to each charge. Where the defense relies on facts not contained in the Order to Show Cause, those specific facts must be stated;
- (C) A specific admission or denial of each fact alleged in this Order to Show Cause. Where the Respondents have no specific knowledge regarding a fact alleged in this Order to Show Cause, a statement to that effect must be contained in the hearing request. Allegations of this Order to Show Cause not answered in the manner set forth above shall be deemed to have been admitted; and
- (D) A statement requesting a hearing.



Peter L. Hartt
Director of Insurance