



- 1 • One count of embezzlement by an agent, in violation of Penal Code section 508;
- 2 • One count of grand theft of personal property, in violation of Penal Code section
- 3 487(a);

4 (d) A copy of the felony complaint is attached hereto as Exhibit A and is incorporated  
5 herein by referenced.

6 (e) The crimes alleged involve Respondent's transaction of the business of insurance as a  
7 licensed insurance producer and his continued employment creates an ongoing opportunity to  
8 continue the conduct, exposing consumers to financial or other injury.

9 By reason of the foregoing, the Commissioner finds that Respondent has been charged in  
10 a complaint with a crime punishable by imprisonment for a term exceeding one year and which  
11 involves as one of its necessary elements a fraudulent act or an act of dishonesty in the  
12 acceptance, custody, or payment of money or property, and that a failure to immediately issue the  
13 order threatens the financial solvency of an insurer or may cause financial or other injury to any  
14 person, pursuant to Section 1748.5, subdivision(e)(1), of the California Insurance Code.

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16 **NOTICE OF RIGHT TO HEARING**

17 YOU ARE HEREBY NOTIFIED that within thirty (30) days after the issuance of this  
18 Order, you may file with the Insurance Commissioner an application for an hearing on the Order,  
19 addressed to Teresa R. Campbell, Assistant Chief Counsel, California Department of Insurance,  
20 Legal Division, San Francisco Enforcement Bureau, 45 Fremont Street, 21<sup>th</sup> Floor, San Francisco,  
21 California 94105.

22 YOU ARE FURTHER NOTIFIED that upon written request to the Insurance  
23 Commissioner at the above address, you may request an extension of the thirty (30) day period by  
24 an additional thirty (30) days provided that the request is filed with the Insurance Commissioner  
25 within thirty (30) days after the Order is issued.

26 YOU ARE FURTHER NOTIFIED that a hearing will be scheduled within fifteen (15)  
27 business days after the application for a hearing is filed or within a longer period of time if  
28 requested by you.

1 YOU ARE FURTHER NOTIFIED that a violation of this Order may result in civil  
2 penalties of up to one thousand dollars (\$1,000) per day for each day for which the violation  
3 continues.

4 This Order is issued as of the date set forth below and is effective immediately.

5 IN WITNESS WHEREOF, I have hereunto set my hand and affixed my official seal this  
6 21<sup>st</sup> day of March 2011.

7 DAVE JONES  
Insurance Commissioner

8 By /s/

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10 Teresa R. Campbell  
Assistant Chief Counsel  
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