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**BEFORE THE INSURANCE COMMISSIONER
 OF THE STATE OF UTAH**

COMPLAINANT:	:	MOTION AND
	:	ORDER TO SHOW CAUSE
	:	
UTAH INSURANCE DEPARTMENT	:	REVOCAION OF LICENSE
	:	
RESPONDENT:	:	
	:	
MICHAEL T. MOSS	:	Docket No. <u>2010-089-LC</u>
10855 S. Country Creek Dr.	:	
South Jordan, UT 84095	:	Enf. Case No. <u>2582</u>
License No. 84797	:	
	:	

MOTION FOR ORDER TO SHOW CAUSE

Comes now, M. Gale Lemmon, attorney for Complainant, and hereby moves the commissioner for an Order to Show Cause why Respondent’s Utah title insurance agent’s license should not be revoked for failure to obey an Order of the commissioner in the above-entitled matter. In support of its motion, Complainant shows as follows:

1. In an Order dated May 23, 2011, in the above-entitled matter, Respondent Michael T. Moss (“Moss”) was granted a title marketing agent’s license.
2. As a part of the Order granting Mr. Moss’ license, Mr. Moss was ordered to allow the license of The Title Insurance Agency license to lapse and not renew that license. The Title Insurance Agency’s license lapsed on May 31, 2011.
3. Also, as a part of that Order, Mr. Moss was also ordered to assure that The Title


Insurance Agency was in compliance with all insurance laws prior to the lapse of the license, including payment of all assessments and fees due and the filing of all past due reports for the agency.

4. Respondent failed to obey the Order of the commissioner in failing to file the past due reports for The Title Insurance Agency and to pay outstanding assessments and fees due in the amount of \$425.00. The past due reports remain unfiled, and the outstanding assessments and fees remain unpaid as of the date of this Motion.

5. Pursuant to Utah Code Annotated §§ 31A-2-308 and 31A-23a-111(5)(b)(ii)(C), if a licensee fails to obey an order of the commissioner, he may assess forfeitures of up to \$2,500.00 per violation and may suspend or revoke Respondent's license.

6. Because Respondent failed to obey the Order previously made in this matter, the commissioner should now revoke Respondent's license and order Respondent to pay an administrative forfeiture in an amount to be designated by the commissioner for violation of that Order.

DATED this 5th day of July, 2011.



M. GALE LEMMON
Assistant Attorney General

ORDER TO SHOW CAUSE

Having considered the motion of the Complainant, and good cause otherwise appearing:

IT IS HEREBY ORDERED:

1. Respondent shall appear before the commissioner or his designated representative on Tuesday, the 26th day of July, 2011, at the hour of 9:30 a.m.
at the offices of the Utah Insurance Department, State Office Building, Room 3112, Salt Lake City, Utah 84114, to show cause, if any there be, why Respondent's insurance agent's license should not be immediately revoked for failure to obey an Order of the commissioner and the imposition of additional forfeitures for violation of that Order.

2. Failure to appear shall result in your default being taken and the entry of an order revoking your license and assessment of additional forfeitures.

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DATED this _____ day of _____, 2011.

NEAL T. GOOCH
INSURANCE COMMISSIONER



MARK E. KLEINFELD, Esq.
Administrative Law Judge
Utah Insurance Department
State Office Building, Room 3110
Salt Lake City, UT 84114
Telephone (801) 538-3800

In compliance with the Americans with Disabilities Act, individuals needing special accommodations (including auxiliary communicative aids and services) during this proceeding should call the Utah Insurance Department at (801) 538-3800 at least three working days prior to the proceeding.