



Neal T. Gooch
Insurance Commissioner
Commissioner
Utah Insurance Department

Gary R. Herbert
Governor

Brett Barrett
Deputy

AGREEMENT FOR SURRENDER OF LICENSE IN LIEU OF ADMINISTRATIVE ACTION

The parties to this agreement are The Utah Insurance Commissioner (“Commissioner”) and JAMES E. PENNINGTON (“Licensee”).

This agreement is entered into and is effective on the date herein noted below.

WHEREAS, the Utah Insurance Department (“Department”) has commenced an investigation of the Licensee for alleged violation(s) of the Utah Insurance Code, Department rules and/or an order of the Commissioner, and

WHEREAS, the alleged violation(s) would have resulted in an administrative action being taken against the Licensee, and

WHEREAS, if proven, the alleged violation(s) would **not** have resulted in the revocation of the license(s) of the Licensee, but would have resulted in other administrative sanctions being imposed, and

WHEREAS, the Licensee desires to surrender its insurance license(s) rather than have an administrative action taken against the Licensee by the Department,

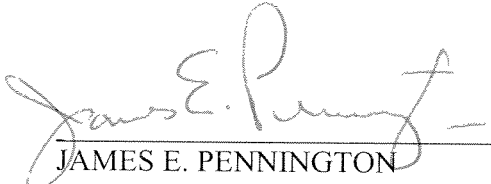
IT IS HEREBY AGREED:

1. The Licensee hereby surrenders its Utah insurance license(s) to the Commissioner who hereby accepts the surrender of the Licensee’s license(s) effective as of the date of this agreement.
2. This surrender is in lieu of any administrative action that may have been taken against the Licensee for any violations of the Utah Insurance Code, Department rules, or an order of the Commissioner now known to the department.
3. This agreement, along with the allegations relating thereto, is reportable to the National Association of Insurance Commissioners (NAIC) and any other entity requesting information on the Licensee by the Department. Further, the Licensee agrees to provide information regarding this agreement to any insurance department in the United States or any of

its territories when applying for an insurance license or any renewal thereof or to any insurer inquiring if any insurance department has taken action against the license of the Licensee.


4. The Licensee may not apply for any insurance license in the State of Utah within 5 years of the date of this agreement, unless specific written permission has been received from the Commissioner.

DATED this 31 day of May, 2012.



JAMES E. PENNINGTON
Utah Insurance License No. 210238

NEAL T. GOOCH
Insurance Commissioner



M. Gale Lemmon
Assistant Attorney General

License Surrendered:

Type:

License No.:

Resident Individual Producer

210238