HELEN A. FROHLICH #8814
Assistant Utah Attorney General
SEAN D. REYES #7969
Utah Attorney General
Attorneys for Utah Insurance Department
160 East 300 South, 5th Floor
P.O. Box 140874
Salt Lake City, Utah 84114-0874
Telephone: (801) 366-0375
hfrohlich@agutah.gov

BEFORE THE UTAH INSURANCE COMMISSIONER

UTAH INSURANCE DEPARTMENT, Complainant, vs. PARADISE SETTLEMENT SERVICES, LLC, Respondent.	NOTICE OF AGENCY ACTION Docket No. 2020-4275

The Utah Insurance Department ("Department") commences this agency action as an informal adjudicative proceeding for entry of Findings of Fact, Conclusions of Law and Order to which the Department and Respondent Paradise Settlement Services, LLC, ("Respondent") have stipulated. Filed contemporaneously with this Notice of Informal Adjudicative Proceeding are the parties' Stipulation and their proposed Findings of Fact, Conclusions of Law and Order.

The legal authority and jurisdiction under which the proceeding is maintained is Utah Code §§ 31A-2-201 and 63G-4-201 through -203 and Utah Admin. Code R590-160.

DATED this **12th** day of **December**, 2020.

TANJI J. NORTHRUP
Interim Utah Insurance Commissioner

Tanji J. Northrup

Digitally signed by Tanji J. Northrup
DN: cn=Tanji J. Northrup, o=Utah Insurance Department, ou=Commissioner, email=tnorthrup@utah.gov, c=US
Date: 2020.12.02 15:40:46 -07'00'

Utah Insurance Department
3110 State Office Building
Salt Lake City, UT 84114
Telephone: (801) 538-3860
Email: uidadmincases@utah.gov

CERTIFICATE OF SERVICE

The undersigned certifies that on this date a true and correct copy of the foregoing Notice of Informal Adjudicative Proceeding was electronically mailed to:

Christopher McLucas, Owner
Paradise Settlement Services
chris.mclucas@yahoo.com

Helen A. Frohlich
Assistant Attorney General
hfrohlich@agutah.gov

DATED this _____ day of _____, 2020

_____
Jeanine Couser
Utah Insurance Department
3110 State Office Building
Salt Lake City, UT 84114

HELEN A. FROHLICH #8814
Assistant Utah Attorney General
SEAN D. REYES #7969
Utah Attorney General
Attorneys for Utah Insurance Department
160 East 300 South, 5th Floor
P.O. Box 140874
Salt Lake City, Utah 84114-0874
Telephone: (801) 366-0375
hfrohlich@agutah.gov

BEFORE THE UTAH INSURANCE COMMISSIONER

UTAH INSURANCE DEPARTMENT, Complainant, vs. PARADISE SETTLEMENT SERVICES, LLC, Respondent.	STIPULATION Docket No. 2020-4275

The Utah Insurance Department and Respondent Paradise Settlement Services, LLC, stipulate as follows:

1. The Findings of Fact, Conclusions of Law and Order filed herewith may be entered.

2. The Findings of Fact, Conclusions of Law and Order shall not be subject to reconsideration, modification, hearing, agency review or appeal.

3. The issuance of the signed and adopted Order is solely for the purpose of disposing of the specific matter entitled therein. The only promises, agreements and

understandings that the parties have regarding this matter are contained in the Findings of Fact, Conclusions of Law and Order.

4. The parties enter into this Stipulation voluntarily, knowingly, and free from any coercion of any kind.

DATED: November 23, 2020

/s/ Christopher McLucas
Christopher McLucas, Owner
Paradise Settlement Services, LLC

DATED: November 23, 2020

/s/ Helen A. Frohlich
Helen A. Frohlich
Assistant Utah Attorney General
Attorney for Utah Insurance Department

HELEN A. FROHLICH #8814
Assistant Utah Attorney General
SEAN D. REYES #7969
Utah Attorney General
Attorneys for Utah Insurance Department
160 East 300 South, 5th Floor
P.O. Box 140874
Salt Lake City, Utah 84114-0874
Telephone: (801) 366-0375
hfrohlich@agutah.gov

BEFORE THE UTAH INSURANCE COMMISSIONER

UTAH INSURANCE DEPARTMENT, Complainant, vs. PARADISE SETTLEMENT SERVICES, LLC, Respondent.	FINDINGS OF FACT, CONCLUSIONS OF LAW AND ORDER Docket No. 2020-4275

Complainant, Utah Insurance Department ("Department") and Respondent, Paradise Settlement Services, LLC, ("Respondent"), have stipulated to entry of the following Findings of Fact, Conclusions of Law, and Order. Based upon that stipulation, and good cause appearing, the following are made and entered:

FINDINGS OF FACT

1. Respondent is a resident producer organization holding Utah license number 636969.
2. Respondent's mailing address is 401 E. Corporate Dr. Ste. 290, Lewisville, TX 75057.
3. On August 4, 2020, the Department initiated an audit review of Respondent.
4. During the audit, the Department determined that Respondent's trust account was with

American National Bank of Texas, which does not have an office or branch in Utah.

5. On or about October 7, 2020, Respondent provided the Department with documentation of a new trust account with Chase Bank, which does have branches in Utah. The account was opened on September 21, 2020.

6. The Department and Respondent have agreed to an administrative forfeiture of $5,000.00.

CONCLUSIONS OF LAW

1. The Utah Insurance Commissioner ("Commissioner") has jurisdiction over the parties and this informal adjudicative proceeding pursuant to Utah Code §§ 31A-1-105 and 31A-2-201.

2. The Commissioner has legal authority to impose penalties on the Department's licensees who violate the Utah Insurance Code pursuant to Utah Code § 31A-2-308.

3. Utah Code § 31A-23a-409(2)(a)(i) requires that trust monies be deposited in a federally insured trust account with a qualified depository with an office in Utah. Respondent violated this provision when trust account funds were deposited in a trust account maintained by American National Bank of Texas, which does not have an office in Utah.

4. As penalties for the violations in this case, Respondent should be ordered to pay a forfeiture of $5,000.00.

ORDER

Based on the foregoing Findings of Fact and Conclusions of Law, it is hereby Ordered that:

1. Respondent shall pay a forfeiture of $5,000.00 for the violations described in the Conclusions of Law.

2. Respondent is ordered not to commit the violations described in the Conclusions of Law in the future.

DATED this **12th** day of **December**, 2020.

TANJI J. NORTHRUP
Interim Utah Insurance Commissioner

Tanji J. Northrup Digitally signed by Tanji J. Northrup DN: cn=Tanji J. Northrup, o=Utah Insurance Department, ou=Commissioner, email=tnorthrup@utah.gov, c=US Date: 2020.12.02 15:30:51 -07'00'

Utah Insurance Department
3110 State Office Building
Salt Lake City, UT 84114
801-538-3860
Email: uidadmincases@utah.gov

NOTICE TO RESPONDENT

Failure to obey this Order may subject you to further penalties that include a forfeiture of up to $2,500 per violation, with each day of the violation constituting a separate violation. Other penalties for failing to obey this Order may include license suspension, probation, refusal to renew, or revocation. Failure to obey this Order may also result in an action taken against you in a court of competent jurisdiction where forfeitures of up to $10,000 for each day the failure to comply continues until judgment is rendered. If you are licensed in other jurisdictions, you may be required to report this proceeding in those jurisdicitons.

CERTIFICATE OF SERVICE

The undersigned certifies that on this date a true and correct copy of the foregoing Findings of Fact, Conclusions of Law and Order was emailed to:

Christopher McLucas, Owner
Paradise Settlement Services, LLC
chris.mclucas@yahoo.com

Helen A. Frohlich
Assistant Attorney General
hfrohlich@agutah.gov

DATED this _____ day of _____, 2020.

_____
Jeanine Couser
Utah Insurance Department
3110 State Office Building
Salt Lake City, UT 84114

HELEN A. FROHLICH #8814
Assistant Utah Attorney General
SEAN D. REYES #7969
Utah Attorney General
160 East 300 South, 5th Floor
P.O. Box 140874
Salt Lake City, Utah 84114-0874
Telephone: (801) 366-0364
hfrohlich@agutah.gov

BEFORE THE UTAH INSURANCE COMMISSIONER

UTAH INSURANCE DEPARTMENT, Complainant, vs. PARADISE SETTLEMENT SERVICES, LLC, Respondent.	**COMPLIANCE WITH UTAH CODE § 31A-2-404(1)(b)(ii)** Docket No. 2020-4275

Pursuant to Utah Code § 31A-2-404(1)(b)(ii) the Interim Utah Insurance Commissioner consulted with and sought the concurrence of the Title and Escrow Commission ("Commission"), in an open meeting, regarding the imposition of the penalty set forth in the Findings of Fact, Conclusions of Law and Order in this matter.

By a vote of _____ to _____, the Commission:

_____ concurred

_____ did not concur

with the imposition of the penalty.

Dated: _____, 2020.

_____
Chase Phillips, Chair
Title and Escrow Commission