



## State of Utah

SPENCER J. COX  
Governor

DEIDRE M. HENDERSON  
Lieutenant Governor

## Insurance Department

JONATHAN T. PIKE  
Insurance Commissioner

### Title & Escrow Commission Meeting

(<https://insurance.utah.gov/licensee/title/tec>)

**Date:** **March 11, 2024**

**Time:** **9:00 AM**

**Place:** **In Person**

Taylorsville SOB  
4315 S. 2700 W.  
Flaming Gorge Room  
Taylorsville, UT 84129

**Virtual**

Google Meet  
[meet.google.com/nea-ykwf-qmx](https://meet.google.com/nea-ykwf-qmx)  
904-900-0531 Phone  
865 264 079# Password

### ATTENDEES

#### TITLE & ESCROW COMMISSION

Chair, Kim Holbrook (*Insurer, Davis County*) Nathan Sprague (*Insurer, Utah County*)  
Vice Chair, Jeff Mathews (*Public, Morgan County*) Tina Williams (*Agency, Juab County*)  
Kevin Parke (*Agency, Salt Lake County*)

#### DEPARTMENT STAFF

Jon Pike, *Insurance Commissioner* Reed Stringham, *Deputy Comm.* Tracy Klausmeier, *P&C Dir.*  
Randy Overstreet, *Licensing Mgr.* Patrick Lee, *Finance Dir.* Kelly Christensen, *P&C Asst. Dir.*  
Michael Covington, *CE Specialist* Steve Gooch, *PIO Recorder*

### AGENDA

#### General Session: (Open to the Public)

- **Welcome** / Kim Holbrook, Chair
- **Telephone Roll Call**
- **Adopt Minutes of Previous Meetings**
  - February 12
  - February 21
- **Concurrence Reports** / Kim
  - Licenses
- **Update on 2024 Goals**
  - ULTA report / Kim
- **New Business**
  - Nonconcurrence in licensing FL company / Reed
  - Statute/rule conflict regarding concurrence / Reed
  - Need for dual licensee statute and rule / Tracy
  - R592-6 amendments - next steps / Reed
  - Questions about Bulletin 2024-2 / Reed
- **Old Business**
  - Legislative review / Reed
- **Other Business**
- **Hot Topics**

*Executive Session* (None)

- **Adjourn**
- **Next Meeting: April 8, 2024** — Flaming Gorge Room, Taylorsville State Office Building

**2024 Meeting Schedule**

<del>Jan 22</del> Flaming Gorge	<del>Feb 12</del> Flaming Gorge	Mar 11 Flaming Gorge	Apr 8* Flaming Gorge	May 13 Flaming Gorge	<b>Jun 10</b> Flaming Gorge
Jul 8 TBD	Aug 19 TBD	Sep 9 TBD	Oct 21* TBD	Nov 18 TBD	Dec 9 TBD

\*Proposed TEC/REC meeting immediately following

**2024 Goals**

1. Continue making sure continuing education and testing are relevant
2. Continue working with the Real Estate Commission
3. Continue working with the ULTA as a liaison
4. Increase awareness of cyber and wire fraud's effect on consumers and agencies
5. Increase awareness of affiliated business arrangements (ABA)
6. Increase consumer awareness of the role a title insurance company plays in a real estate transaction
7. Increase industry's awareness of the marketing rule and how to ask questions

**Title Agency Licensing  
Feb 2024**

**New licenses**

<b>Agency ID</b>	<b>Name</b>	<b>Orig. Issue Date</b>	<b>Expire Date</b>	<b>LOA</b>
(none)				

**Renewal Licenses**

<b>Agency ID</b>	<b>Name</b>	<b>Orig. Issue Date</b>	<b>Expire Date</b>	<b>LOA</b>
6951	ACCESS TITLE COMPANY, INC	1989-12-06	2026-02-28	TE
6951	ACCESS TITLE COMPANY, INC	1989-12-06	2026-02-28	TS
6447	CEDAR LAND TITLE, INC	1984-02-22	2026-02-28	TE
6447	CEDAR LAND TITLE, INC	1984-02-22	2026-02-28	TS
193128	FIDELITY NATIONAL TITLE AGENCY OF UTAH, LLC	2020-02-20	2026-02-28	TE
193128	FIDELITY NATIONAL TITLE AGENCY OF UTAH, LLC	2020-02-20	2026-02-28	TS
6953	INWEST TITLE SERVICES, INC	1990-02-05	2026-02-28	TE
6953	INWEST TITLE SERVICES, INC	1990-02-05	2026-02-28	TMR
6953	INWEST TITLE SERVICES, INC	1990-02-05	2026-02-28	TS
174452	LYDOLPH & WEIERHOLT TITLE INSURANCE AGENCY	2014-02-25	2026-02-28	TE
174452	LYDOLPH & WEIERHOLT TITLE INSURANCE AGENCY	2014-02-25	2026-02-28	TS
174379	SILVER LEAF TITLE INSURANCE AGENCY	2014-02-11	2026-02-28	TE
174379	SILVER LEAF TITLE INSURANCE AGENCY	2014-02-11	2026-02-28	TS
6772	SOUTHERN UTAH TITLE COMPANY OF CEDAR CITY	1986-02-18	2026-02-28	TE
6772	SOUTHERN UTAH TITLE COMPANY OF CEDAR CITY	1986-02-18	2026-02-28	TS
200171	SUMMIT TITLE AGENCY OF UTAH, LLC	2022-02-22	2026-02-28	TE
200171	SUMMIT TITLE AGENCY OF UTAH, LLC	2022-02-22	2026-02-28	TS
6974	SUTHERLAND TITLE COMPANY	1990-02-13	2026-02-28	TE
6974	SUTHERLAND TITLE COMPANY	1990-02-13	2026-02-28	TS
162436	VENDORTRAK TITLE INSURANCE AGENCY LLC	2010-02-02	2026-02-28	TE
162436	VENDORTRAK TITLE INSURANCE AGENCY LLC	2010-02-02	2026-02-28	TS

**Lapsed Licenses**

<b>Agency ID</b>	<b>Name</b>	<b>Orig. Issue Date</b>	<b>Expired Date</b>	<b>LOA</b>
168627	MAGELLAN TITLE	2012-02-23	2024-02-29	TMR
168627	MAGELLAN TITLE	2012-02-23	2024-02-29	TS

**Reinstated Licenses**

<b>Agency ID</b>	<b>Name</b>	<b>Orig. Issue Date</b>	<b>Expire Date</b>	<b>Reinstated</b>	<b>LOA</b>
199321	SAM, REYNOLDS & VAN OOSTENDORP, PC	2021-11-30	2025-11-30	2024-02-27	TS

**Title Agent Licensing  
Feb 2024**

**New Licenses**

<b>Agent ID</b>	<b>Name</b>	<b>Orig. Issue Date</b>	<b>Expire Date</b>	<b>LOA</b>
2119970	GRIFFITH, JESSICA	2024-02-20	2027-01-31	TE
2113046	JUST, CASEY	2024-02-08	2026-10-31	TE
2118591	PIPOSAR, JEFFREY	2024-02-21	2026-10-31	TE
2118255	SCHENCK, BRENDA	2024-02-20	2026-02-28	TE

**Renewed Licenses**

<b>Agent ID</b>	<b>Name</b>	<b>Orig. Issue Date</b>	<b>Expire Date</b>	<b>LOA</b>
43739	ALGER, STEVEN	2000-01-14	2026-02-28	TS
38182	ASHTON, CORTLUND	1995-09-14	2026-02-28	TS
38182	ASHTON, CORTLUND	1995-09-14	2026-02-28	TE
1457512	BAGLEY, LUCAS	2013-04-23	2026-02-28	TE
1457512	BAGLEY, LUCAS	2011-05-09	2026-02-28	TS
68155	BAILEY, JENNIFER	2001-07-25	2026-02-28	TE
76047	BAUMGART, JOEL	2002-04-15	2026-02-28	TS
40561	BRINGHURST, MICHAEL	2002-05-02	2026-02-28	TE
40561	BRINGHURST, MICHAEL	1999-02-17	2026-02-28	TS
1746427	BROWN, WANN	2018-02-05	2026-02-28	TE
1746427	BROWN, WANN	2018-02-05	2026-02-28	TS
2008575	CALDWELL, AMANDA	2022-01-21	2026-02-28	TS
2008575	CALDWELL, AMANDA	2022-03-02	2026-02-28	TE
71241	CARTER, KRISTY	2001-11-07	2026-02-28	TE
42640	CURLIS, D	1993-04-07	2026-02-28	TS
41096	Coleman Pace, Tamra	1998-12-09	2026-02-28	TS
35771	DEAN, RODNEY	1999-11-10	2026-02-28	TS
35771	DEAN, RODNEY	2002-03-01	2026-02-28	TE
39505	DYE, TRACY	1994-01-26	2026-02-28	TMR
40317	EVANS, BRUCE	1992-01-31	2026-02-28	TS
40317	EVANS, BRUCE	1992-01-31	2026-02-28	TE
30595	GARDINER, JOYCE	1995-02-15	2026-02-28	TS
30595	GARDINER, JOYCE	1992-01-24	2026-02-28	TE
1542565	HAMBLIN, COURTNEY	2016-01-13	2026-02-28	TE
91663	HARRIS, DEBRA	2003-06-26	2026-02-28	TE
147168	HASLEM, HOLLY	2007-06-22	2026-02-28	TS
147168	HASLEM, HOLLY	2021-04-09	2026-02-28	TE
40036	HEPPLER, LESLIE	1993-06-10	2026-02-28	TE
1856735	JENSEN, JORDAN	2021-03-24	2026-02-28	TE
31164	KEARNS, SHARON	1993-09-27	2026-02-28	TE
1740544	KEETCH, MCKAY	2019-02-25	2026-02-28	TE
1740544	KEETCH, MCKAY	2018-01-30	2026-02-28	TS
89680	LEWIS, MICHAEL	2003-05-06	2026-02-28	TMR
89680	LEWIS, MICHAEL	2011-01-07	2026-02-28	TE
89680	LEWIS, MICHAEL	2010-12-14	2026-02-28	TS

**Renewed Licenses**

<b>Agent ID</b>	<b>Name</b>	<b>Orig. Issue Date</b>	<b>Expire Date</b>	<b>LOA</b>
1520800	LIECHTY, NICOLE	2013-03-06	2026-02-28	TE
1839095	Larsen, Barbara	2019-09-16	2026-02-28	TMR
1993820	MILLER, JAQUELYN	2023-11-01	2026-02-28	TE
1993820	MILLER, JAQUELYN	2021-11-23	2026-02-28	TS
1611637	MOORE, MISTY	2015-04-28	2026-02-28	TE
118931	MOORE, ADAM	2005-09-23	2026-02-28	TE
98443	MORTENSEN, JEFFREY	2004-02-09	2026-02-28	TS
1640141	MUNOZ, KEELY	2015-11-19	2026-02-28	TMR
1704204	NEVILLE, PATRICK	2017-04-17	2026-02-28	TS
93959	OLSON, LAURIZA	2003-09-08	2026-02-28	TS
113915	OSTLER, TAISHA	2005-05-17	2026-02-28	TE
96376	PLYER, THELISSA	2003-11-26	2026-02-28	TS
2008577	REA, KARYN	2022-03-10	2026-02-28	TE
2008577	REA, KARYN	2022-01-21	2026-02-28	TS
144028	ROBERTSON, MARCY	2007-09-25	2026-02-28	TE
45633	SILER, R	1985-08-18	2026-02-28	TE
45633	SILER, R	1985-08-18	2026-02-28	TS
137842	STEGGELL, JOSEPH	2007-08-03	2026-02-28	TE
137842	STEGGELL, JOSEPH	2007-05-16	2026-02-28	TS
115649	STEINER, JASON	2005-07-07	2026-02-28	TS
115649	STEINER, JASON	2005-08-16	2026-02-28	TE
32059	SUMMERS, JOANN	1995-08-29	2026-02-28	TE
1711646	TRINTA-RUIZ, EDWIN	2017-06-28	2026-02-28	TE
1361879	TURNIDGE, ELISHA	2008-05-12	2026-02-28	TE
45362	TWITCHELL, BARBARA	1987-05-26	2026-02-28	TE
45362	TWITCHELL, BARBARA	1987-05-26	2026-02-28	TS
1464736	Talbot, Sarah	2011-08-03	2026-02-28	TE
1837726	VAN WYK, NATALIA	2019-09-30	2026-02-28	TE
1614767	VANCE, KRISTEN	2017-01-20	2026-02-28	TE
1614767	VANCE, KRISTEN	2015-06-05	2026-02-28	TMR
30907	WILLIAMSEN, ROBERT	1994-12-27	2026-02-28	TE
30907	WILLIAMSEN, ROBERT	1994-12-27	2026-02-28	TS
71117	WILLOUGHBY, CASEY	2001-11-01	2026-02-28	TE
1604827	YOUNG, SHERRY	2015-03-02	2026-02-28	TE

**Lapsed Licenses**

<b>Agent ID</b>	<b>Name</b>	<b>Orig. Issue Date</b>	<b>Expired Date</b>	<b>LOA</b>
16062	ASHDOWN, CHRISTINE	1990-04-26	2024-01-31	TE
40870	CARLSON, ROBERT	1971-03-01	2024-01-31	TE
40870	CARLSON, ROBERT	1971-03-01	2024-01-31	TS
106900	CORRAO, PETINA	2004-10-21	2024-01-31	TE
95590	DUNCAN, TAI	2021-07-12	2024-01-31	TE
95590	DUNCAN, TAI	2021-07-12	2024-01-31	TS
1947851	HALLIDAY, PAUL	2021-05-04	2024-01-31	TS
1653947	LARSEN, KATELYN	2021-03-31	2024-01-31	TE

**Lapsed Licenses**

<b>Agent ID</b>	<b>Name</b>	<b>Orig. Issue Date</b>	<b>Expired Date</b>	<b>LOA</b>
1364206	LOUGHMILLER, SETH	2021-03-12	2024-01-31	TS
39427	MCCRARY, TAMERA	1994-09-23	2024-01-31	TE
1526693	SCOTT, JENNIFER	2013-05-23	2024-01-31	TMR
1987684	SHAUM, EYAN	2022-01-21	2024-01-31	TS
1987684	SHAUM, EYAN	2021-10-28	2024-01-31	TE

**Reinstated Licenses**

<b>Agent ID</b>	<b>Name</b>	<b>Orig. Issue Date</b>	<b>Expire Date</b>	<b>Reinstated</b>	<b>LOA</b>
1711644	PARK, THOMAS	2017-06-28	2026-01-31	2024-02-23	TS
1711644	PARK, THOMAS	2019-12-12	2026-01-31	2024-02-23	TE

**R592-1-5. Commission Concurrence with License Issuance or Renewal.**

(1) The commissioner will report to the Commission, at an interval and in a format acceptable to the commissioner and the Commission, the name of each title licensee and applicant who is issued:

(a) an initial license; or

(b) a renewal license.

(2) In an open and public meeting, the Commission shall:

(a) give final concurrence; or

(b) not concur with the licensing decision of the commissioner.

(3) If the Commission does not concur with a licensing decision of the commissioner, the commissioner shall commence an administrative proceeding under the Utah Administrative Procedures Act to deny, revoke, suspend, limit, or place on probation the license.

**Utah Code Section 31A-2-404(1)(c)**

Unless a provision of this title grants specific authority to the commission, the commissioner has authority over the implementation of this title related to a title insurance matter. When a provision requires concurrence between the commission and commissioner, and concurrence cannot be reached, the commissioner has final authority.



## Utah Insurance Department Memorandum

To: Members of the Title and Escrow Commission (TEC)

Fr: Utah Insurance Department

Re: TEC request for concurrence in proposed amendments to Utah Admin. Code R592-6

Dt: March 6, 2024

With one exception, the Insurance Commissioner concurs in the TEC's proposed amendments to Utah Admin. Code R592-6. Concurrence is not given for proposed R592-6-4(6) which regulates office sharing between title insurance agencies and their clients. For the reasons set forth below, this activity need not be regulated.

### **Reasons for not concurring in proposal to regulate office sharing**

The Commissioner decided not to concur in R592-6-4(6) for three reasons:

- The proposal will be difficult to comply with and enforce.
- The proposal will be minimally effective in preventing consumer confusion.
- The Department's resources are better spent on financial protections than on monitoring office sharing.

#### **1. The proposal is difficult to comply with and enforce**

The TEC proposes three restrictions on office sharing:

- office signs for the title insurance agency and the client must be separate and distinct;
- public entrances to their offices must be separate and distinct; and
- if the offices are adjacent, any interior door between them must be kept locked.

The restrictions for signs and entrances are too subjective to be useful. Reasonable people will differ on whether a sign or an entrance is separate and distinct, particularly given the many ways in which commercial offices can be configured. The February 21, 2024 TEC meeting on office sharing proves this point; the industry could not agree on any standard for regulating signs and entrances.

Because the proposal gives no objective guidance, it will be difficult to comply with and enforce. Honest, well-intentioned producers won't be able to determine whether the signs or office spaces they have invested in are compliant. And with this lack of clarity, experience tells us that the Department will spend its time repeatedly fielding complaints and questions about separate and distinct signs and entrances.

Subjectivity is not the only problem with this proposal. Unless a trespasser takes a photograph of an interior common door, it will be nearly impossible to prove that the door was

actually locked, unlocked but closed, or open at any given time. As a result, the Department's investigations will become "he-said-she-said" contests that are rarely definitively resolved.

## **2. The proposal will be minimally effective in preventing consumer confusion**

The TEC is concerned that office sharing may mislead consumers. According to the TEC, when realtors or lenders share space with a title insurance agency, consumers may incorrectly assume that the two are part of the same business organization. And based on this mistaken belief, consumers may then conclude that they must do business with the agency. Because consumers are free to hire the agency of their choice, the TEC hopes to prevent this misunderstanding by requiring that agencies have separate and distinct office signs and entrances and that common interior doors be locked.

Regardless of this proposal's effect, however, it would be better to simply tell consumers outright that they have a right to hire their own title insurance agency. A direct, black-and-white disclosure will have more impact than any sort of indirect influence that restrictions on signs, entrances and internal doors may generate.

The TEC could consider a rule that requires a title insurance agency, before starting work, to inform the consumer in writing that the consumer may freely choose an agency. This requirement could draw on the form of notice used by affiliated title insurance agencies under federal law (Regulation X, Appendix D):

You are NOT required to use [name of title insurance agency] for title insurance and escrow services as a condition of using [name of client] for the services that it provides. THERE ARE OTHER TITLE INSURANCE AND ESCROW PROVIDERS AVAILABLE WITH SIMILAR SERVICES. YOU ARE FREE TO SHOP AROUND TO DETERMINE THAT YOU ARE RECEIVING THE BEST SERVICES AND THE BEST RATE FOR THESE SERVICES.

I/we acknowledge reading and understanding this disclosure form.

---

Consumer

## **3. Regulatory resources should be spent on financial protection**

The Department recognizes that consumer confusion about hiring a title insurance agency is not an insignificant concern. However, the Department's regulatory resources are better spent on financially protecting those consumers than on enforcing restrictions for signs, entrances and interior doors. This is particularly true when consumer confusion can be easily eliminated with minimal effort -- a written disclosure. The legislature's emphasis this past session on financial protection (HB399, SB31 and SB151 (original version)) serves to confirm that the Department's focus is appropriate.



## State of Utah

SPENCER J. COX  
Governor

DEIDRE M. HENDERSON  
Lieutenant Governor

## Insurance Department

JONATHAN T. PIKE  
Insurance Commissioner

# BULLETIN 2024-2

To: Utah Title Insurance Licensees  
From: Jonathan T. Pike, Insurance Commissioner  
Date: March 1, 2024  
Subject: **Application of Title Insurance Laws to Affiliated Title Insurance Businesses**

Utah's 2019 legislature passed a law authorizing agency title insurance producers to become affiliated with non-insurance businesses. *Utah Code* § [31A-23a-1003](#). This law states that affiliated title businesses are governed by Section 8 of the Real Estate Settlement Procedures Act ("RESPA") and rules promulgated thereunder. *Id.* at § [31A-23a-1001\(8\)](#), [-1002](#), [-1003](#). The Division of Real Estate ("DRE"), not the Insurance Department, is charged with enforcing the RESPA laws. *Id.* at § [31A-23a-1002](#).

The RESPA laws that apply to affiliated title businesses prohibit a variety of conduct that could injure consumer interests. The prohibitions include:

- Giving anything of value<sup>1</sup> for business referrals rather than for services actually performed, *12 U.S.C. § 2607(a)*;
- Splitting charges for services not actually performed, *12 U.S.C. § 2607(b)*;
- Failing to disclose affiliated business arrangements to customers, *12 U.S.C. § 2607(c)*; and
- Requiring customers to use a particular title agency for settlement services, *id.*

According to the legislature, in deciding whether an affiliated business has violated RESPA, the DRE may consider the following:

- 1) whether the title entity:
  - is staffed with its own employees to conduct title insurance business;
  - manages its own business affairs;
  - has a physical office for business that is separate from any producer's or associate's office and pays market rent;
  - provides the essential functions of title insurance business for a fee, including incurring the risks and receiving the rewards of any comparable title entity; and
  - performs the essential functions of title insurance business itself;

---

<sup>1</sup> A thing of value includes: "monies, things, discounts, salaries, commissions, fees, duplicate payments of a charge, stock, dividends, distributions of partnership profits, franchise royalties, credits representing monies that may be paid at a future date, the opportunity to participate in a money-making program, retained or increased earnings, increased equity in a parent or subsidiary entity, special bank deposits or accounts, special or unusual banking terms, services of all types at special or free rates, sales or rentals at special prices or rates, lease or rental payments based in whole or in part on the amount of business referred, trips and payment of another person's expenses, or reduction in credit against an existing obligation." *12 C.F.R. § 1024.14(d)*.

- 2) if the title entity contracts with another person to perform a portion of the title entity's title insurance business, whether the contract:
  - is with an independent third party; and
  - provides payment for the services that bears a reasonable relationship to the value of the services or goods received; and
- 3) whether the person from whom the title entity receives referrals under the affiliated business arrangement also sends title insurance business to other title entities.

*Utah Code* § [31A-23a-1003](#).

RESPA's provisions, and the factors provided by the legislature, sometimes overlap with regulations that apply to non-affiliated businesses. For example, much of Utah Admin. Code [R592-6-4](#) prohibits title insurance agencies from giving or receiving things of value in exchange for business referrals. This rule and its supporting statute also protect consumers from conduct that is misleading, is deceptive, or provides an unfair inducement. *Utah Code* § [31A-23a-402\(8\)\(b\)](#).

The overlap raises a question of the extent to which laws enforced by the Department should govern affiliated title businesses under the DRE's jurisdiction. The Utah Supreme Court has provided an answer to this. When "faced with two statutes that purport to cover the same subject, [courts] seek to determine the legislature's intent as to which applies. In doing this, [courts] follow the general rules of statutory construction, which provide both that 'the best evidence of legislative intent is the plain language of the statute,' and that 'a more specific statute governs instead of a more general statute.'" *Jensen v. IHC Hosps., Inc.*, 944 P.2d 327, 331 (Utah 1997).


Applying those rules here, the legislature has indicated that matters addressed by RESPA and the factors supplied by the legislature specifically apply to affiliated business. The law also plainly states that the DRE has jurisdiction of those matters. Therefore, if statutes and rules enforced by the Department address the same general matters enforced by the DRE, the Department will decline to enforce them. This approach, in addition to complying with Supreme Court precedent, avoids duplicated regulation and therefore responsibly allocates the Department's finite resources.

This Bulletin cannot identify all of the overlapping laws that the Department will leave to the DRE's enforcement. However, generally speaking, the Department will not enforce an overlapping law that concerns giving of things of value or disclosing information to consumers. On the other hand, the Department can say with certainty that affiliated businesses are still required to:

- Obtain a title insurance license from the Department, *Utah Code* § [31A-23a-204](#);
- Obtain a title insurer's appointment, *Utah Code* § [31A-23a-115\(1\)\(a\)](#);
- Annually file a report with the Department, *Utah Code* § [31A-23a-413](#) and *Utah Admin. Code* [R592-11](#);
- Maintain search and examination records for 15 years, *Utah Code* § [31A-20-110](#);
- Maintain escrow records for the current calendar year plus three years, *Utah Code* § [31A-23a-412\(5\)\(a\)](#); and
- Keep trust funds separate, *Utah Code* § [31A-23a-409\(1\)](#).

This Bulletin replaces Bulletin 2019-2. Please address questions to Reed Stringham ([rmstringham@utah.gov](mailto:rmstringham@utah.gov)) or Tracy Klausmeier ([tklausmeier@utah.gov](mailto:tklausmeier@utah.gov)).

DATED this 1st day of March 2024.

A handwritten signature in blue ink that reads "Jonathan T. Pike". The signature is written in a cursive style with a large initial "J".

---

Jonathan T. Pike  
Insurance Commissioner