| BEFORE THE INSURANCE OF OR | 0- |
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| STATE OF OKLAHOMA, ex rel. JOHN D. |) WCE CO 2012 |
| DOAK, Insurance Commissioner, |) Arionnyo |
| Petitioner, |) ONLY OSIONER |
| v. |) Case No. 12-0867-DIS |
| CULTURAL INSURANCE SERVICES INTERNATIONAL, INC., a nonresident third party administrator, Respondent. |)))) |

CONDITIONAL ADMINISTRATIVE ORDER AND NOTICE OF RIGHT TO BE HEARD

COMES NOW the State of Oklahoma, ex rel. John D. Doak, Insurance Commissioner, by and through his attorney, Julie Meaders, and alleges and states as follows:

JURISDICTION

- 1. John D. Doak is the Insurance Commissioner of the State of Oklahoma and is charged with the duty of administering and enforcing all provisions of the Oklahoma Insurance Code, 36 O.S. §§ 101 et seq.
- 2. Cultural Insurance Services International, Inc. was formerly licensed by the State of Oklahoma as a nonresident third-party administrator holding license 863680. Its address of record is River Plaza, 9 West Broad Street, Stamford, CT 06902.
- 3. The Commissioner may either suspend or revoke a third-party administrator's license or assess a civil penalty of not more than Five Thousand Dollars (\$5,000.00) for each occurrence of a violation of any of the provisions of the Oklahoma Insurance Code. 36 O.S. § 1450(G).

ALLEGATIONS OF FACT

- 1. Respondent's Oklahoma third party administrator license lapsed on September 30, 2011. Respondent thereafter failed to submit a renewal application for licensure until September 11, 2012 when Respondent submitted the renewal application along with the TPA annual report that was due June 1, 2012 for the year 2011. Respondent never filed a 2010 annual report for which was due on June 1, 2011.
- 2. Respondent was instructed that another renewal form was necessary to renew the license until September 2013 and that Respondent must file an annual report for the year 2010.
- 3. Any person who is acting as or presenting himself to be an administrator without a valid license shall be subject, upon conviction, to a fine of not less than One Thousand Dollars (\$1,000.00) nor more than Ten Thousand Dollars (\$10,000.00) for each occurrence. 36 O.S. § 1450(H).
- 4. Failure of any third party administrator to execute and file annual reports as required by 36 O.S. § 1452 shall constitute cause, after notice and opportunity for hearing, for censure, suspension, or revocation of administrator license to transact business in this state, or a civil penalty of not less than One Hundred Dollars (\$100.00) or more than One Thousand Dollars (\$1,000.00) for each occurrence, or both censure, suspension, or revocation and civil penalty. 36 O.S. § 1452.

ALLEGED VIOLATIONS OF LAW

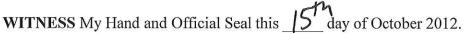
- 1. Respondent is in violation of 36 O.S. § 1450(H) for acting as or presenting itself as a third party administrator in Oklahoma without a valid license.
- 2. Respondent is in violation of 36 O.S. § 1452 for failing to timely execute and file the 2010 annual report.

ORDER

IT IS THEREFORE ORDERED by the Insurance Commissioner that Cultural Insurance Services International, Inc. is FINED ONE THOUSAND DOLLARS (\$1,000.00) for operating without a license and is FINED FIVE HUNDRED DOLLARS (\$500.00) for failing to timely file annual reports. The \$1,500.00 fine is to be paid within thirty (30) days of receipt of this order made payable to the Oklahoma Insurance Department.

IT IS FURTHER ORDERED, ADJUDGED AND DECREED by the Insurance Commissioner that this Order is a Conditional Order. Unless the Respondent requests a hearing with respect to the Allegations of Fact set forth above within thirty (30) days of the date of mailing of this Order, this Order and the penalties set forth above shall become a Final Order on the thirty-first day following the date of mailing this Order. A request for hearing should be in writing addressed to Julie Meaders, Oklahoma Insurance Department, Legal Division, 3625 NW 56th Street, Suite 100, Oklahoma City, Oklahoma 73112. The request for hearing must state the grounds for the request to set aside or modify the Order.

Any such hearing shall be conducted according to the procedures for contested cases under the Insurance Code and 75 O.S. §§ 250 et seq. If the Respondent serves a timely request for hearing on the Oklahoma Insurance Department, this Conditional Order shall act as notice of the matters to be reviewed at the hearing, and the Allegations of Fact, Alleged Violations of Law, and penalties imposed in this Conditional Order shall be considered withdrawn, pending final resolution at the hearing.





JOHN D. DOAK INSURANCE COMMISSIONER STATE OF OKLAHOMA

i Meaders

Julie Meaders
Assistant General Counsel
3625 N.W. 56th Street, Suite 100
Oklahoma City, OK 73112

Telephone: (405) 521-2746 Facsimile: (405) 522-0125

CERTIFICATE OF MAILING

I, Julie Meaders, hereby certify that a true and correct copy of the above and foregoing Conditional Administrative Order and Notice of Right to be Heard was mailed by certified mail with postage prepaid and return receipt requested on this ______ day of October 2012 to:

Cultural Insurance Services International, Inc. River Plaza 9 West Broad Street Stamford, CT 06902

CERTIFIED MAIL NO: 7008 1830 0003 9411 9617

and a copy was delivered to:

DeAnn Robinson/Financial Division

JULIE MEADERS

ASSISTANT GENERAL COUNSEL

| 7.7 | U.S. Postal Service TM CERTIFIED MAILTM RECEIPT (Domestic Mail Only; No Insurance Coverage Provided) | | |
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| SENDER: COMPLETE THIS SECTION | COMPLETE THIS SECTION ON DELIVERY | | | |
| Complete items 1, 2, and 3. Also complete item 4 if Restricted Delivery is desired. Print your name and address on the reverse so that we can return the card to you. Attach this card to the back of the mailplece, or on the front if space permits. | A. Signature X. Agent Addressee B. Received by Printed Name) C. Date of Delivery C. Date of Delivery C. Date of Delivery C. Date of Delivery | | | |
| Article Addressed to: OKLAHOMA INSUR | In Test, enter delivery address below: No | | | |
| Cultural Ins. Serv. International, Inc. River Plaza 9 West Broad Street Stamford, CT 06902 Lega | 3 2012 Division | | | |
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| | 4. Restricted Delivery? (Extra Fee) | | | |
| 2. Article Number (Transfer from service label) 7008 1830 0003 9411 9617 | | | | |
| PS Form 3811, February 2004 Domestic Return Receipt 102595-02-M-1540 | | | | |