

BEFORE THE IOWA INSURANCE COMMISSIONER

IN THE MATTER OF

EDMOND SCARBOROUGH and
IBCS GROUP, INC.

)
) NUNC PRO TUNC ORDER
)
)
) DIVISION FILE NO.: 71423
)

NOW comes the Iowa Insurance Division ("Division"), pursuant to Iowa Code § 505.8 (2011) and the provisions of Iowa Unauthorized Insurers Act – Iowa Code Chapter 507A (2011), and Iowa Code Chapter 522B (2011) and finds as follows:

FACTS

1. The Commissioner of Insurance, Susan Voss, pursuant to Iowa Code § 505.8 (2011), administers the Iowa Unauthorized Insurers Act – Iowa Code Chapter 507A (2011), and the licensing of insurance producers under Iowa Code Chapter 522B (2011) ("Insurance Commissioner") issued a Cease and Desist Order in the above-captioned matter on or about July 20, 2011 ("Cease and Desist Order").

2. Paragraph 18 of the Cease and Desist Order states:

18. In 2008, Scarborough, in his personal capacity and with his then wife Yvonne Kay Scarborough, filed for Chapter 11 bankruptcy in the Middle District of Florida United States Bankruptcy Court, Tampa Division.

ORDERS

WHEREFORE, IT IS HEREBY ORDERED pursuant to the powers granted to the Insurance Commissioner by Iowa Code §§ 505.8 (2011) and 507A.10 (2011) as follows:

A. Paragraph 18 of the Cease and Desist Order is corrected to state:

18. In 2001, Scarborough, in his personal capacity and with his then wife Yvonne Kay Scarborough, filed for Chapter 11

bankruptcy in the Middle District of Florida United States
Bankruptcy Court, Tampa Division.

B. All other statements, facts, counts, findings, orders and notices in the Cease and Desist
Order shall remain the same as set forth therein.

Dated this 29th day of July, 2011.

IOWA INSURANCE DIVISION



by ROBERT KOPPIN
Enforcement Bureau Chief
Iowa Insurance Division
330 Maple Street
Des Moines, IA 50319

Original Filed with:
IOWA INSURANCE DIVISION
330 Maple Street
Des Moines, IA 50319

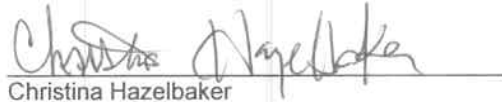
Copy to:
Stan Thompson
Davis, Brown, Koehn, Shors, & Roberts,
P.C.
215 10th Street, Ste. 1300
Des Moines, Iowa 5030
StanThompson@davisbrownlaw.com

ATTORNEY FOR RESPONDENTS

SENT VIA USPS & ELECTRONIC MAIL

CERTIFICATE OF SERVICE

I certify under penalty of perjury and pursuant to the laws
of Iowa that copies of the foregoing instrument(s) were
served to the names and addresses of the parties by the
methods listed, with proper posted affixed thereto as
required on this 29th day of July, 2011.



Christina Hazelbaker

BEFORE THE IOWA INSURANCE COMMISSIONER

IN THE MATTER OF

EDMOND SCARBOROUGH and
IBCS GROUP, INC.

)
) CEASE AND DESIST ORDER
)
)
) DIVISION FILE NO.: 71423
)

NOW comes the Iowa Insurance Division (“Division”), pursuant to Iowa Code § 505.8 (2011) and the provisions of Iowa Unauthorized Insurers Act – Iowa Code Chapter 507A (2011), and Iowa Code Chapter 522B (2011) and finds as follows:

PARTIES AND JURISDICTION

1. The Commissioner of Insurance, Susan Voss, pursuant to Iowa Code § 505.8 (2011), administers the Iowa Unauthorized Insurers Act – Iowa Code Chapter 507A (2011), and the licensing of insurance producers under Iowa Code Chapter 522B (2011) (“Insurance Commissioner”).
2. IBCS Group, Inc. (“IBCS”) is an entity incorporated in the state of Florida with a last known mailing address of 944 Glenwood Station, Suite 104, Charlottesville, Virginia 22901.
3. Edmond C. Scarborough (“Scarborough”) is an individual with a last known business mailing address of 944 Glenwood Station, Suite 104, Charlottesville, Virginia 22901.
4. Pursuant to Iowa Code § 507A.10, the Insurance Commissioner is authorized to issue a summary order directed to any person requiring the person to cease and desist from engaging in such acts or practices or take other affirmative action as in her judgment is necessary to comply with the requirements of Iowa Code Chapter 507A and/or any rule or order adopted or issued thereto.
5. Pursuant to Iowa Code § 522B.17, the Insurance Commissioner is authorized to issue a summary order directed to any person requiring the person to cease and desist from engaging

in such acts or practices or take other affirmative action as in her judgment is necessary to comply with the requirements of Iowa Code Chapter 522B and/or any rule or order adopted or issued thereto.

FACTUAL BACKGROUND

6. According to Scarborough's website (<http://edmundscarborough.com/>), Scarborough issues surety bonds, as an individual, for construction contracts.
7. According to IBCS's website (<http://www.ibcs.com/>), IBCS is an authorized Risk Manager for the Scarborough Bond & Guarantee Program.
8. According to the Florida Division of Corporations website, Scarborough serves as the CEO of IBCS.
9. Holland Contract Corp. ("Holland"), a general construction contractor in Iowa, hired A'Hearn Plumbing & Heating, Inc. ("A'Hearn") as an Iowa subcontractor to perform certain work on a construction project for Iowa Valley Community College in the state of Iowa ("Project").
10. Holland required A'Hearn to obtain a performance bond for the Project.
11. Scarborough, acting as a surety in his individual capacity, issued a surety bond dated November 3, 2008 guaranteeing A'Hearn's construction obligations for the Project ("Bond").
12. IBCS was involved in the placement and/or administration of the Bond.
13. IBCS does not have, and has not been granted, a certificate of authority as an insurance company and/or a license as an insurance producer in the state of Iowa.
14. Scarborough, in his individual capacity, has not been granted, a certificate of authority as an insurance company and/or a license as an insurance producer in the state of Iowa.
15. A'Hearn filed for bankruptcy before completing its construction obligations for the Project, and Holland subsequently filed a claim on the Bond.

16. The purpose of Chapter 507 of the Iowa Code (Examination of Insurance Companies) is, among other things, "to provide an effective and efficient system for examining the activities, operations, financial condition, and affairs of all persons transacting the business of insurance in [Iowa]".

17. The Insurance Commissioner has not examined either Scarborough as an individual or ICBS pursuant to the provisions of Chapter 507 of the Iowa Code.

18. In 2008, Scarborough, in his personal capacity and with his then wife Yvonne Kay Scarborough, filed for Chapter 11 bankruptcy in the Middle District of Florida United States Bankruptcy Court, Tampa Division.

19. Scarborough, as surety, began performing under the Bond by hiring a new subcontractor to complete A'Hearn's unfinished work.

20. Scarborough in his personal capacity and/or ICBS subsequently filed a civil cause of action related to the Bond against Holland, A'Hearn and other parties in Iowa District Court.

VIOLATIONS OF IOWA INSURANCE LAWS

COUNT I

UNAUTHORIZED INSURERS

21. Paragraphs 1 – 20 are incorporated herein by reference.

22. IBCS, and its principals, officers, directors, agents, representatives, and affiliates including, but not limited to Scarborough, have violated Iowa Code Chapter 507A by performing any acts of doing an insurance business as an unauthorized insurer within the meaning of Iowa Code § 507A.3 in violation of Iowa Code § 507A.5 and should be ordered to cease and desist.

23. Scarborough, in his individual capacity, has violated Iowa Code Chapter 507A by performing any acts of doing an insurance business as an unauthorized insurer within the

meaning of Iowa Code § 507A.3 in violation of Iowa Code § 507A.5 and should be ordered to cease and desist.

24. A cease and desist order is necessary and appropriate in the public interest and for the protection of policyholders and consistent with the purposes fairly intended by the provisions of Iowa Code Chapter 507A (The Iowa Unauthorized Insurers Act).

COUNT II

LICENSING OF INSURANCE PRODUCERS

25. Paragraphs 1 - 24 are incorporated herein by reference.

26. IBCS, and its principals, officers, directors, agents, representatives, and affiliates including, but not limited to Scarborough, have violated Iowa Code § 522B.2, by offering, selling and/or participating in the offer or sale of insurance in Iowa; negotiating insurance in Iowa without being licensed as an insurance producer; and/or has offered to the public, for a fee or commission, to engage in the business of offering any advice, counsel, or service with respect to the benefits, advantages, or disadvantages promised under any policy of insurance in Iowa and should be ordered to cease and desist.

27. Scarborough, in his individual capacity, has violated Iowa Code § 522B.2, by offering, selling and/or participating in the offer or sale of insurance in Iowa; negotiating insurance in Iowa without being licensed as an insurance producer; and/or has offered to the public, for a fee or commission, to engage in the business of offering any advice, counsel, or service with respect to the benefits, advantages, or disadvantages promised under any policy of insurance in Iowa and should be ordered to cease and desist.

28. The cease and desist order is necessary and appropriate in the public interest and for the protection of policyholders and consistent with the purposes fairly intended by the provisions of Iowa Code Chapter 522B.

ORDERS

WHEREFORE, IT IS HEREBY ORDERED pursuant to the powers granted to the Insurance Commissioner by Iowa Code §§ 505.8 (2011) and 507A.10 (2011) as follows:

- A. IBCS Group, Inc., and its principals, officers, directors, agents, representatives, and affiliates including, but not limited to Edmund C. Scarborough, shall cease and desist from performing any acts of doing an insurance business as an unauthorized insurer in Iowa, including but not limited to the issuance of surety bonds, in violation of Iowa Code § 507A.5 and/or any rule or order adopted or issued thereto.
- B. Edmund C. Scarborough, in his individual capacity, shall cease and desist from performing any acts of doing an insurance business as an unauthorized insurer in Iowa, including but not limited to the issuance of surety bonds, in violation of Iowa Code Chapter 507A.5 and/or any rule or order adopted or issued thereto.
- C. IBCS Group, Inc., and its principals, officers, directors, agents, representatives, and affiliates including, but not limited to, Scarborough, shall cease and desist from offering, selling and/or participating in the offer or sale of insurance in Iowa; negotiating insurance in Iowa without being licensed as an insurance producer; and/or offering to the public, for a fee or commission, to engage in the business of offering any advice, counsel, or service with respect to the benefits, advantages, or disadvantages promised under any policy of insurance, as described herein, or any other insurance products, in the state of Iowa on in violation of Iowa Code § 522B.2 and/or any rule or order adopted or issued thereto.
- D. Edmund C. Scarborough, in his individual capacity, shall cease and desist from offering, selling and/or participating in the offer or sale of insurance; negotiating insurance in Iowa without being licensed as an insurance producer; and/or offering to the public, for a fee or commission, to engage in the business of offering any advice, counsel, or service with respect

to the benefits, advantages, or disadvantages promised under any policy of insurance, as described herein, or any other insurance products, in the state of Iowa, in violation of Iowa Code § 522B.2 and/or any rule or order adopted or issued thereto.

E. IBCS Group, Inc., and its principals, officers, directors, agents, representatives, and affiliates including, but not limited to Edmund C. Scarborough, are assessed a civil penalty of \$10,000.00 for violating provisions of the Iowa Unauthorized Insurers Act pursuant to Iowa Code §§ 507A.10(1) and 522B.17 and/or any rule or order adopted or issued thereto.

F. Edmund C. Scarborough, in his individual capacity, is assessed a civil penalty of \$10,000.00 for violating provisions of the Iowa Unauthorized Insurers Act pursuant to Iowa Code §§ 507A.10(1) and 522B.17 and/or any rule or order adopted or issued thereto.

G. IBCS Group, Inc., and its principals, officers, directors, agents, representatives, and affiliates including, but not limited to Edmund C. Scarborough, are assessed \$1,000 for investigation and proceeding costs pursuant to Iowa Code § 505.8(10) and/or any rule or order adopted or issued thereto.

H. Edmund C. Scarborough, in his individual capacity, is assessed \$1,000 for investigation and proceeding costs pursuant to Iowa Code § 505.8(10) and/or any rule or order adopted or issued thereto.

IT IS FURTHER ORDERED pursuant to the powers granted to the Commissioner of Insurance by Iowa Code § 507A.8 that IBCS and Scarborough, within forty-five (45) days of receipt of this Order, furnish the Division with a complete listing of all Iowa insurance contracts and other documents evidencing insurance with both authorized and unauthorized insurers and to disclose the amount of insurance, name and address of each insurer, gross amount of premium paid or to be paid and the name and address of the person or persons assisting or aiding in the solicitation, negotiation, or effectuation of such insurance.

IT IS FURTHER ORDERED pursuant to the powers granted to the Commissioner of Insurance by Iowa Code § 507A.9 that IBCS and Scarborough, within forty-five (45) days of receipt of this Order, for all Iowa premiums collected during the preceding calendar year on which insurance was effectuated, continued or renewed, shall remit a premium tax on gross premiums charged for such insurance on subjects resident, located or to be performed in this state equal to the applicable percent, as provided in Iowa Code § 432.1 (2011), and any applicable penalty.

NOTICE REGARDING FAILURE TO REQUEST A HEARING

If you fail to request a hearing within thirty (30) days of the date of this Cease and Desist Order, the Order shall be a final Order of the Commissioner of Insurance and shall be enforceable by the Commissioner of Insurance in an administrative or court proceeding.

NOTICE REGARDING EXHAUSTION OF ADMINISTRATIVE REMEDIES AND RIGHT TO SEEK JUDICIAL REVIEW

The failure to request a hearing can constitute a failure to exhaust your administrative remedies and limit the issues subject to judicial review. You may seek judicial review of this Order pursuant to Iowa Code Chapter 17A after the Order becomes final. The Order becomes final thirty (30) days after it is issued if you do not timely request a contested case hearing, or following hearing if you do timely request a contested case hearing.

NOTICE OF PENALTIES FOR WILLFUL VIOLATION OF THIS ORDER

YOU ARE NOTIFIED that any person who willfully violates this order shall be deemed in contempt of the order pursuant to Iowa Code § 507A.10. The Division may petition the district court to enforce the order. The district court shall find the person in contempt of the order if the

court finds after hearing that the person or insurer is not in compliance with the order. The court may assess a civil penalty against the person or insurer and may issue further orders as it deems appropriate.

YOU ARE ALSO NOTIFIED that a person who, acting as an insurance producer as defined in Iowa Code Chapter 522B, without proper licensure, or an insurer who willfully violates any provision of Iowa Code Chapter 507A, the Iowa Unauthorized Insurers Act, or any rule or order issued under 507A, is guilty of a class "D" felony or a class "C" felony if such violation results in a loss of more than ten thousand dollars pursuant to Iowa Code § 507A.10.

NOTICE REGARDING IMPACT OF ORDER ON EXISTING LICENSES

A final Cease and Desist Order may adversely affect existing business or professional licenses and result in license revocation or disciplinary action. For example, a final Cease and Desist Order issued to a licensed insurance agent may subject the insurance agent to insurance license revocation or other disciplinary action. Further notice is given that the Iowa Insurance Division may review this Cease and Desist Order for a potential license revocation or disciplinary action.


NOTICE OF RIGHT TO REQUEST HEARING

NOTICE IS HEREBY GIVEN that IBCS or Scarborough, or any individual representing any Respondent, may request a hearing in this matter. This request must be in writing and must be filed within thirty (30) calendar days of the date of this Order with Janet Gustafson, Enforcement Bureau Attorney, Iowa Insurance Division, 330 Maple Street, Des Moines, Iowa 50319. A notice of the hearing shall be prepared and shall be given at least fifteen (15) days before the date of the hearing unless the parties agree to an earlier date. The hearing shall be held within forty-five (45) days after the date of the notice of the hearing unless extended by the presiding

officer for good cause with at least fifteen days notice to the parties. The resulting hearing will be held in accordance with Iowa Code Chapter 17A (2011).

Dated this 19th day of July, 2011.

IOWA INSURANCE DIVISION

A handwritten signature in cursive script, appearing to read "Robert Koppin", written over a horizontal line.

by ROBERT KOPPIN
Enforcement Bureau Chief
Iowa Insurance Division
330 Maple Street
Des Moines, IA 50319

Original Filed with:

IOWA INSURANCE DIVISION
330 Maple Street
Des Moines, IA 50319

Copy to:

ICBS Group, Inc.
944 Glenwood Station, Suite 104
Charlottesville, Virginia 22901
ecs@ibcs.com

Edmund C. Scarborough
944 Glenwood Station, Suite 104
Charlottesville, Virginia 22901
ecs@ibcs.com

SENT VIA USPS CERTIFIED MAIL &
ELECTRONIC MAIL

CERTIFICATE OF SERVICE

I certify under penalty of perjury and pursuant to the laws of Iowa that copies of the foregoing instrument(s) were served to the names and addresses of the parties by the methods listed, with proper posted affixed thereto as required on this 20th day of July, 2011.


Christina Hazelbaker

BEFORE THE IOWA INSURANCE COMMISSION

IN THE MATTER OF)	
)	AGREEMENT
)	ORDER
EDMOND SCARBOROUGH and IBCS GROUP, INC.)	CONSENT TO ORDER
)	
)	DIVISION FILE NO.: 71423
)	
)	DIA NO.:
)	

COMES NOW the Iowa Insurance Division ("Division"), pursuant to Iowa Code § 505.8 (2011) and Iowa Code Chapter 507A and 522B regarding Scarborough and IBCS Group, Inc. ("Respondents"). The Respondents consent to the entry of this Order and, by doing so, do not contest the Division's personal jurisdiction and subject matter jurisdiction over the matters set forth herein.

PARTIES AND JURISDICTION

1. The Iowa Insurance Commissioner, Susan E. Voss, administers and enforces Iowa Code Chapter 507A – Iowa Unauthorized Insurers Act and Chapter 522B – Licensing of Insurance Producers, and/or any rule or order adopted or issued thereto, pursuant to Iowa Code § 505.8 (2011).
2. IBCS Group, Inc. is an entity incorporated in the state of Florida with a last known mailing address of 944 Glenwood Station, Suite 104, Charlottesville, Virginia 22901 (referred to herein with IBCS Group Inc.'s officers, employees, agents, representatives, etc. as "IBCS").
3. Edmond C. Scarborough is an individual with a last known business mailing address of 944 Glenwood Station, Suite 104, Charlottesville, Virginia 22901 (and referred to herein with Scarborough's officers, employees, agents, representatives, etc. as "Scarborough"; and referred to collectively with IBCS as "Respondents").
4. Scarborough serves as the Chief Executive Officer of IBCS.
5. The Division alleges that Respondent(s) have engaged in acts and practices within the state of Iowa constituting violations of Iowa Code §§ 507A.5 and 522B.2 and/or any rule or order adopted or issued thereto.

FACTUAL BACKGROUND

6. Paragraphs 1 - 5 are incorporated as if fully set forth herein.
7. On or about July 20, 2011, the Division issued a Cease and Desist Order to Respondents ("Cease and Desist Order").
8. Respondents have been advised of their rights to contest the Cease and Desist Order, whereupon they entered into this Agreement and Consent to Order and Agreement, waiving their right to a hearing thereon.
9. Respondents allege that some of the facts set forth in the Cease and Desist Order are incomplete and/or incorrect.

AGREEMENT AND UNDERTAKINGS

10. Paragraphs 1 – 9 are incorporated as if fully set forth herein.
11. The Respondents have agreed to and will not issue or deliver any further bonds or other forms of insurance: (i) in the state of Iowa, (ii) to Iowa residents or Iowa companies, and/or (iii) for any construction projects located in the state of Iowa before obtaining licensure with the Division.
12. The Respondents have agreed to and will not engage in any marketing and/or informational communications sent to or directed at individuals or companies in Iowa.
13. The Respondents have agreed to and will not make representations that Scarborough, or any other individual surety, may transact the business of insurance, including but not limited to issuing surety bonds, in the state of Iowa before obtaining licensure with the Division.
14. In consideration of the resolution of this matter pursuant to the expressed terms herein the Respondents agree to and will pay \$12,000 to the Division within twenty-one (21) days of this Agreement ("Settlement Sum").
15. If Respondents fail to pay the settlement sum as set forth above, the Respondents have agreed to and will pay the penalties and costs set forth in the Cease and Desist Order issued to Respondents on or about July 20, 2011.
16. The Respondents have agreed and understand that nothing contained herein shall be construed to deprive any person or entity of any private right of action under any law.

17. The Respondents have agreed and understand that nothing contained herein shall be construed to limit the authority of the Division to enforce laws, regulations, or rules.
18. The Respondents have agreed and understand that the Division reserves its right to take administrative action for any violation of the Iowa insurance statutes and/or regulations unknown to the Division on or before the date of this Order.
19. Nothing herein shall be deemed to restrict or impede upon the Respondents' right to bid on, participate in, or issue surety bonds for federal projects as permitted by the Miller Act (40 U.S.C. Section 3131 to 3134) and any rules, regulations and orders adopted or issued thereto.
20. Nothing herein shall be construed to prohibit the Respondents from taking steps necessary to perform any of the Respondents' obligations related to bonds issued in Iowa on or before the date of this Order.

ORDER

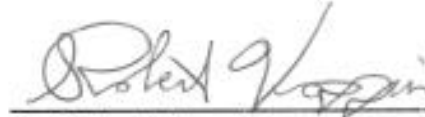
WHEREFORE, IT IS HEREBY ORDERED, pursuant to the powers granted to the Commissioner of Insurance by Iowa Code §§505.8(10) and 507A.10 and the information stated above, as follows:

- A. The Respondents shall not issue or deliver any further bonds or other forms of insurance: (i) in the state of Iowa, (ii) to Iowa residents or Iowa companies, and/or (iii) for any construction projects located in the state of Iowa before obtaining licensure with the Division.
- B. The Respondents shall not engage in any marketing and/or informational communications sent to or directed at individuals or companies in Iowa.
- C. The Respondents shall not make representations that Scarborough, or any other individual surety, may transact the business of insurance, including but not limited to issuing surety bonds, in the state of Iowa before obtaining licensure with the Division.
- D. In consideration of the resolution of this matter pursuant to the expressed terms herein the Respondents agree to and will pay \$12,000 to the Division within twenty-one (21) days of this Agreement ("Settlement Sum").
- E. If Respondents fail to pay the settlement sum as set forth above, the Respondents shall pay the penalties and costs set forth in the Cease and Desist Order issued to Respondents on or about July 20, 2011.
- F. Nothing contained herein shall be construed to deprive any person or entity of any private right of action under any law.

- G. Nothing contained herein shall be construed to limit the authority of the Division to enforce laws, regulations, or rules.
- H. The Division reserves its right to take administrative action for any violation of the Iowa insurance statutes and/or regulations unknown to the Division on or before the date of this Order.
- I. Nothing herein shall be deemed to restrict or impede upon the Respondents' right to bid on, participate in, or issue surety bonds for federal projects as permitted by the Miller Act (40 U.S.C. Section 3131 to 3134) and any rules, regulations and orders adopted or issued thereto.
- J. Nothing herein shall be construed to prohibit the Respondents from taking steps necessary to perform any of the Respondents' obligations related to bonds issued in Iowa on or before the date of this Order.
- K. This Order is a full and final resolution of the claims against Respondents pertaining to Division File No. 71423 currently pending before the Iowa Insurance Commissioner.

Dated this 21st day of
September, 2011.

SUSAN E. VOSS
IOWA INSURANCE COMMISSIONER




by Robert Koppin
Enforcement Bureau Chief
Iowa Insurance Division
330 Maple Street
Des Moines, IA 50319

CONSENT TO ORDER

We, Edmund C. Scarborough and IBCS Group, Inc., have read, understand, and do knowingly enter into this Agreement and consent to this Order in its entirety. We will abide by the terms of this Order, but do so without admitting or denying the allegations, to avoid the uncertainties of litigation or possible consequences of any hearing. By executing this consent, we understand that we are waiving our rights to a hearing, to confront and cross-examine witnesses, to produce evidence, and to judicial review. We also understand that the Order is considered final administrative action that may be reported by the Division to the Central Registration Depository and to the National Association of Insurance Commissioners and to all insurance companies with which we are actively appointed. We also understand that this Order is a public record under Iowa Code Chapter 22 (2011), including disclosure to other state regulatory authorities, upon request, pursuant to Iowa Code Section 505.8(6)(c) (2011). We also understand that the information contained in the Agreement and Order and our consent will be posted to the Division's website.


DATED this 13 day of September, 2011.



Edmund C. Scarborough

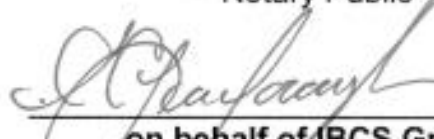
Subscribed and sworn before me by Edmund C. Scarborough on this 13 day of September, 2011.

Leora J. Payne
Notary Public
Reg. #7244234
Commonwealth of Virginia
My Commission Expires 9/30/2013



Notary Public

DATED this 13 day of September, 2011.



on behalf of IBCS Group, Inc.

Subscribed and sworn before me by Edmund C. Scarborough on this 13 day of September, 2011.
[print name of individual]

Leora J. Payne
Notary Public
Reg. #7244234
Commonwealth of Virginia
My Commission Expires 9/30/2013



Notary Public

Original Filed with:

IOWA INSURANCE DIVISION
330 Maple Street
Des Moines, IA 50319

Copy to:

ICBS Group, Inc.
944 Glenwood Station, Suite 104
Charlottesville, Virginia 22901
ecs@ibcs.com

Edmund C. Scarborough
944 Glenwood Station, Suite 104
Charlottesville, Virginia 22901
ecs@ibcs.com

SENT VIA USPS CERTIFIED MAIL &
ELECTRONIC MAIL


Stanley J. Thompson
Michael C. Richards
Davis Brown Law Firm
215 10th Street, Suite 1300
Des Moines, Iowa 50309
stanthompson@davisbrownlaw.com
mikerichards@davisbrownlaw.com

David Buoncristiani
Jones Day
555 California Street
26th Floor
San Francisco, CA 94104.1500
dbuoncristiani@jonesday.com

Counsel for Respondents
SENT VIA ELECTRONIC MAIL

CERTIFICATE OF SERVICE

I certify under penalty of perjury and pursuant to the laws of Iowa that copies of the foregoing instrument(s) were served to the names and addresses of the parties by the methods listed, with proper posted affixed thereto as required on this 21st day of September, 2011.


Christina Hazelbaker