



BEFORE THE IOWA INSURANCE COMMISSIONER

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IN THE MATTER OF	)	
	)	Division Case No. 123299
	)	
ALL OR NOTHING LLC,	)	
d/b/a ALL OR NOTHING ROOFING AND	)	
CONSTRUCTION	)	
	)	SUMMARY CEASE AND
and	)	DESIST ORDER
	)	
WILLIAM RONALD-ROBERT	)	
CAMPBELL,	)	
DOB 12/20/XXXX	)	
	)	
Respondents.	)	

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On September 18, 2024, Enforcement Attorney Zebulon Black, on behalf of the Iowa Insurance Division (“Division”), submitted a Petition for Summary Cease and Desist Order in the above-captioned matter.

**NOW THEREFORE**, the Commissioner of Insurance, Douglas M. Ommen, pursuant to the provisions of Iowa Code chapters 505, 507A, 507B, and 522C, does hereby make and issue the following findings of fact, conclusions of law and order to cease and desist (“Order”):

**I. PARTIES AND JURISDICTION**

1. The Commissioner of Insurance, Douglas M. Ommen, directly and through his designees, administers and enforces Iowa Code chapter 522C—Licensing of Public Adjusters, Iowa Code Chapter 507A—Iowa Unauthorized Insurers Act and Iowa Code chapter 507B—Insurance Trade Practices, pursuant to Iowa Code § 505.8.

2. All or Nothing LLC (“All or Nothing”) is an Iowa limited liability company, formed on December 13, 2020, with its home office located at 18151 Alpine Drive, Clive, Iowa 50325. The Iowa Secretary of State’s website lists William Campbell as the registered agent with an address of 14643 Summit Drive, Clive, Iowa 50325. All or Nothing filed a fictitious name resolution

with the Iowa Secretary of State on May 11, 2023, under the name All or Nothing Roofing and Construction. All or Nothing is registered as a foreign limited liability company in Kansas, Nebraska, and Missouri.

3. Iowa Department of Inspections, Appeals, and Licensing registers and licenses contractors in the state of Iowa. All or Nothing LLC is licensed as a roofing contractor under registration number C142888. The registered contractor is William Campbell with an address of 1444 Grand Boulevard, Apt. 2020, Kansas City, Missouri, 64106.

4. On information and belief, William Ronald-Robert Campbell (“Campbell”) is an individual with a last known residential address of 14643 Summit Drive, Clive, Iowa 50325. Campbell is the founder and owner of All or Nothing.

5. Pursuant to Iowa Code § 505.28, Respondents consented to the jurisdiction of the Commissioner of Insurance by committing acts governed by chapter 522C.

6. From on or about December 14, 2023, to present, Respondents engaged in acts and practices within the state of Iowa constituting cause for a summary order to cease and desist from engaging in such acts or practices and any other corrective action the Commissioner deems necessary and appropriate pursuant to Iowa Code § 505.8(1), Iowa Code chapters 522C and 507B, and rules adopted pursuant to these chapters.

## **II. FINDINGS OF FACT**

7. All or Nothing is not licensed in the state of Iowa as a public adjuster.

8. Campbell is not licensed in the state of Iowa as a public adjuster.

9. None of All or Nothing’s employees are licensed in the state of Iowa as public adjusters.

### *All or Nothing Website*

10. All or Nothing maintains a website (“the Website”), <https://allornothingroofing.com/>.

11. The Website states that All or Nothing offers “Quality Roofing Solutions and Insurance Services for Residential and Commercial Properties.” It further states that All or Nothing provides these services in Missouri, Nebraska, Iowa and Kansas. The Website indicates the address for All or Nothing is 984 SW 37th Street, Suite 984, Blue Springs, Missouri 64015.

12. The Website additionally states, “Our vision is simple yet powerful. We are committed to fighting for every homeowner, ensuring that they receive the best outcome from their insurance claims and the highest quality of care. Our team understands the frustration that can arise from dealing with insurance companies and shady contractors.”

13. On the Website homepage, there is a meet the owner section. This section identifies William Campbell as the owner and states:

As the founder of All or Nothing Roofing and Construction, William envisioned a company that would go above and beyond in taking on insurance companies and advocating for homeowners.

With over 6.5 years of experience in the roofing and insurance industry, William established our company in 2020 with a clear vision in mind. We take immense pride in our ability to provide round-the-clock service, offer free inspections, and guide you through the insurance process with expertise.

We strive to do things honestly and diligently, ensuring each job is done right.

14. The Website includes a section listing steps of the roofing process from inspection to final walk through. Step Two states, “Consultation[:] We will thoroughly inspect your roof and help determine the best possible solution. Suppose your roof requires repair or replacement due to covered damages. In that case, we assist you in navigating the insurance process.”

15. The Website contains a menu navigation category titled, “Services.” from which another category, “Residential Services,” can be selected. “Insurance Claims” are listed as one of the

residential services provided by All or Nothing. “Insurance Claims” hyperlinks to a page titled “Insurance Claims Assistance in Missouri, Nebraska, Iowa, and Kansas.”

16. The website further contains this same hyperlink and inclusion of “Insurance Claims” under sections titled, “Residential Roofing Services” and “Our Roofing Services” on the homepage of the Website.

17. The “Insurance Claims Assistance in Missouri, Nebraska, Iowa, and Kansas”<sup>1</sup> page, has a paragraph entitled “NAVIGATING INSURANCE CLAIMS FOR YOUR PEACE OF MIND.” This paragraph states, “We understand that the process of filing insurance claims can be a daunting and overwhelming experience. Whether you’re dealing with roof damage from a storm, water leaks, or other issues, we’re here to guide you through the intricacies of insurance claims.”

18. The Website provides more detail on All or Nothing’s involvement in insurance claims, stating:

#### OUR ROLE IN SIMPLIFYING THE PROCESS

At All or Nothing Roofing, we play a vital role in simplifying the insurance claims process:

##### INSPECTION

Our team assesses the damage and provides documentation supporting your claim.

##### INSURANCE LIAISON

We work closely with your insurance company to expedite the process.

##### QUALITY REPAIRS

We ensure the necessary repairs are completed to industry standards.

#### ENSURE YOUR PEACE OF MIND

Let All or Nothing Roofing be your partner in navigating the insurance claims process. We understand the challenges and intricacies involved and are committed to ensuring your peace of mind during this process.<sup>2</sup>

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<sup>1</sup> ALL OR NOTHING ROOFING, <https://allornothingroofing.com/services/residential-services/insurance-claims/> (last visited September 11, 2024).

<sup>2</sup> *Id.*

19. The Website contains a section called, “Experience the All or Nothing Difference.”<sup>3</sup>

Below that the website contains a list including:

Proven Track Record:

With over 6.5 years of experience in the roofing and insurance restoration industry, we have established a solid reputation for delivering exceptional results.

Expertise in Insurance Claims:

Our extensive knowledge of insurance restoration work allows us to easily navigate the complexities of the claims process, ensuring that you receive the maximum benefits you deserve.

20. The Website lists the locations in which All or Nothing operates, including five cities in Iowa: Des Moines, Ames, Newton, Winterset, and Norwalk.<sup>4</sup>

21. These five cities each have their own page on the Website, which all appear the same as the Website’s homepage apart from the title of the page. On the separate city pages, the title of the page states “Roofing Excellence in [City Name].”<sup>5</sup>

#### *All or Nothing Reviews*

22. All or Nothing has a section on their homepage, HEAR WHAT OUR SATISFIED CLIENTS HAVE TO SAY. The reviews do not contain dates or the reviewer’s physical location, but the reviews do indicate where online they were posted, either Facebook or Google Reviews.

R.T. originally posted a Facebook review:

After a hail storm I was left with major damage to my roof and gutters. I was in disbelief with the speed and efficiency that Trae Sampson provided in regards to assistance with a free roof inspection, insurance claim, and rebuilding efforts.

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<sup>3</sup>ALL OR NOTHING ROOFING, <https://allornothingroofing.com/service-areas/iowa/des-moines-ia/> (last visited September 11, 2024).

<sup>4</sup>ALL OR NOTHING ROOFING, <https://allornothingroofing.com/service-areas/iowa/> (last visited September 11, 2024).

<sup>5</sup> See, <https://allornothingroofing.com/service-areas/iowa/des-moines-ia/>, <https://allornothingroofing.com/service-areas/iowa/des-moines-ia/>, <https://allornothingroofing.com/service-areas/iowa/newton-ia/>, <https://allornothingroofing.com/service-areas/iowa/winterset-ia/>, <https://allornothingroofing.com/service-areas/iowa/winterset-ia/> (last visited September 11, 2024).

R.T. also originally posted a Google review stating:

Trae was very professional, polite, and attentive. Through each step of the process he was upfront and honest. This made everything from financial concerns to understanding and working with the insurance adjuster comfortable and simple.

K.M. originally posted a Facebook review:

Will and Zach were consummate professionals, keeping me informed through the entire process from the initial claim until all the work was completed. They understand the difficulties of working with insurance companies and their adjusters.

L.F. originally posted a Google review:

Will and his team were very professional and explained things well. They advised that they would deal directly with our insurance company so we wouldn't have to worry about that part. They kept their word on that!

J.L. originally posted a Google review:

Royce was awesome. He was there for everything and showed up on time and was always very responsive. He also dealt with the insurance side of it and took care of everything in that aspect. . . . With some of the horror stories you hear about insurance and some roofing companies it was great for everything to go without a hitch and to have someone that kept me informed with every step of the way.

*All or Nothing Facebook Page*

23. All or Nothing operates a public Facebook page under the name All or Nothing Roofing & Construction. On April 15, 2024, All or Nothing posted:

Discover the Vision Behind Our Excellence  
Meet William, the visionary founder of All or Nothing Roofing and Construction. With a rich background in roofing and insurance, William launched our company in 2020, aiming to advocate fiercely for homeowners against insurance companies. Our commitment shines in our 24/7 availability, complimentary inspections, and skilled guidance through the insurance maze.

Below that paragraph there is a series of hashtags including #InsuranceExperts.<sup>6</sup>

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<sup>6</sup> ALL OR NOTHING ROOFING & CONSTRUCTION, Facebook (Apr. 15, 2024), <https://www.facebook.com/photo.php?fbid=752182260351093&set=pb.100066779784868.-2207520000&type=3>.

24. The All or Nothing Facebook page further includes multiple mentions of negotiations with insurance companies. One such mention is from March 19, 2024, by an All or Nothing employee. The post reads, “Like a good neighbor statefarm [sic] doesn’t answer[.] Longest statefarm [sic] hold time I’ve had was 1 hour and 34 min[.] We put in the work for you so you’re not the one on hold for hours at a time just trying to move your claim forward [.]” All or Nothing Roofing is tagged in the post and the post is visible on its Facebook page.

25. On April 6, 2023, an All or Nothing Employee created a post that included a story about a homeowner who was denied twice by insurance before All or Nothing Roofing was hired and was approved once an All or Nothing employee was present for the inspection. The post includes the statement, “Don’t let yourself be unprotected at adjuster appointments, call us so you can be protected and properly represented!” Below that there are phone numbers for offices in Kansas City, Omaha, and Des Moines.

26. On April 17, 2024, All or Nothing posted an image that states, “TURNING FRUSTRATION INTO VICTORY!” The post accompanying the photo says:

Your Ally in the Insurance Battlefield  
Turning Frustration into Victory!  
Our vision is to be your steadfast ally, transforming your frustrations with insurance claims into victories. You’re more than a client to us; you’re family deserving the highest standard of care and advocacy.  
Ready to turn the tide? Visit [allornothingroofing.com](http://allornothingroofing.com) or reach out to us at (816) 866-6206 | [will@aonroofing.com](mailto:will@aonroofing.com) and join a family that fights for you.  
#InsuranceAdvocacy<sup>7</sup>

27. On April 26, 2024, All or Nothing posted an image on its Facebook page that states “STREAMLINING YOUR INSURANCE CLAIMS” with the All or Nothing phone number below. The post accompanying the photo says:

Streamlining Your Insurance Claims with All or Nothing Roofing

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<sup>7</sup> ALL OR NOTHING ROOFING & CONSTRUCTION, Facebook (Apr. 17, 2024) <https://www.facebook.com/photo.php?fbid=753325116903474&set=pb.100066779784868.-2207520000&type=3>.

Navigating the insurance claims process can often feel overwhelming, but at All or Nothing Roofing, we're committed to making it as smooth and straightforward as possible for you. Here's how we simplify the journey:

1. **Thorough Inspection:** Our experienced team conducts a comprehensive assessment of the damage, meticulously documenting every detail to support your claim. This crucial step ensures nothing is overlooked, providing a strong foundation for your claim.
2. **Insurance Liaison:** We don't just stop at inspections. Our team actively works alongside your insurance company, serving as a dedicated liaison to expedite the claims process. Our goal is to ensure a seamless communication flow, minimizing delays and maximizing the potential for your claim's approval.
3. **Quality Repairs:** Once approval is obtained, we're ready to spring into action. We guarantee that all necessary repairs are not just completed, but are done so to meet the highest industry standards. Our commitment to quality ensures your home is restored to its pre-damaged condition or better, safeguarding your investment.

At All or Nothing Roofing, we understand the importance of a stress-free claims process. We're here to shoulder the burden, guiding you through each step with expertise and care. Let us help you navigate your insurance claim and restore peace of mind with our professional roofing services.<sup>8</sup>

### **III. CONCLUSIONS OF LAW**

#### **COUNT I**

#### **Unlicensed Public Adjuster**

28. Iowa Code § 507A.5 provides that “[a] person or insurer shall not directly or indirectly perform any act of doing an insurance business as defined in this chapter except as provided by and in accordance with the specific authorization by statute.”

29. Iowa Code § 507A.3(1)(e) defines engaging in the business of insurance to include “[t]he doing of any kind of insurance business specifically recognized as constituting the doing of an insurance business within the meaning of the statutes relating to insurance.”

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<sup>8</sup> ALL OR NOTHING ROOFING & CONSTRUCTION, Facebook (Apr. 26, 2024), <https://www.facebook.com/photo/?fbid=758462566389729&set=ecnf.100066779784868>.



30. Under Iowa Code § 507A.10(2)(a):

Upon a determination by the commissioner that a person or insurer has engaged, is engaging, or is about to engage in any act or practice constituting a violation of this chapter or a rule adopted or order issued under this chapter, the commissioner may issue a summary order, including a brief statement of findings of fact, conclusions of law, and policy reasons for the decision, and directing the person or insurer to cease and desist from engaging in the act or practice or to take other affirmative action as is in the judgement of the commissioner necessary to comply with the requirements of this chapter.

31. Under Iowa Code § 507A.10(1):

Upon a determination by the commissioner, after a hearing conducted pursuant to chapter 17A, that a person or insurer has violated a provision of this chapter, the commissioner shall reduce the findings of the hearing to writing and deliver a copy of the findings to the person or insurer, may issue an order requiring the person or insurer to cease and desist from engaging in the conduct resulting in the violation, and may assess a civil penalty of not more than fifty thousand dollars against the person or insurer.

32. Acting as a public adjuster constitutes the doing of insurance business within the meaning of Iowa Code § 507A.3(1). *See* Iowa Code § 522C.6(3)(b) (authorizing penalties for acting as an unlicensed public adjuster pursuant to Iowa Code chapter 507A).

33. Iowa Code § 522C.4 states a “person shall not operate as or represent that the person is a public adjuster in this state unless the person is licensed by the commissioner in accordance with this chapter.” *See also* Iowa Admin. Code r. 191—55.3.

34. Under Iowa Code § 522C.2(6) a “person” includes an individual or business entity.

35. Iowa Code § 522C.2(7) defines “public adjuster” as “any person who for compensation or any other thing of value acts on behalf of an insured by doing any of the following:

(a) Acting for or aiding an insured in negotiating for or effecting the settlement of a first-party claim for loss or damage to real or personal property of the insured.

(b) Advertising for employment as a public adjuster of first-party insurance claims or otherwise soliciting business or representing to the public that the person is a public adjuster of first-party insurance claims for loss or damage to real or personal property of an insured.

(c) Directly or indirectly soliciting business investigating or adjusting losses, or advising an insured about first-party claims for loss or damage to real or personal property of the insured.”

36. Under Iowa Code § 522C6(3)(c):

If a person has engaged, is engaging, or is about to engage in any act or practice constituting a violation of this chapter or any rule adopted or order issued pursuant to this chapter, the commissioner may issue a summary order that includes a brief statement of findings of fact, conclusions of law, and policy reasons for the order, and that directs the person to cease and desist from engaging in the act or practice constituting a violation and that may assess a civil penalty or take other affirmative action as in the judgment of the commissioner is necessary to assure that the person complies with the requirements of this chapter as provided in chapter 507A.

37. Under Iowa Code § 522C.6(3)(b), “a person who, after hearing, is found to have violated this chapter by acting as a public adjuster without proper licensure may be ordered to cease and desist from engaging in the conduct resulting in the violation and may be assessed a civil penalty according to the provisions of chapter 507A.”

38. Respondents have never been licensed as public adjusters in the state of Iowa.

39. The advertisements located on a publicly available website and a publicly available Facebook page advertise or create the impression that Respondents provide public adjusting services by stating that All or Nothing will work with the insurance company and provide insurance claims assistance. Respondents make specific statements within multiple of its advertisements claiming they know and assist with the insurance claims process.

40. Respondents knew or should have known that operating as a public adjuster without a license violates Iowa Code §§ 507A.5 and 522C.4.

41. Respondents’ acts and practices violated Iowa Code §§ 507A.5 and 522C.4, subjecting Respondents to a summary order directing Respondents to cease and desist from engaging in such acts or practices, the imposition of a civil penalty, and any other corrective action the

Commissioner deems necessary and appropriate pursuant to Iowa Code §§ 505.8, 507A.10, 522C.4, 522C.6, and Iowa Administrative Code rule 191—55.3.

**COUNT II**  
**Unfair Trade Practice**  
**Residential Contractor Acting as a Public Adjuster**

42. Under Iowa Code § 507B.3 “a person shall not engage in this state in any trade practice which is defined in this chapter as, or determined pursuant to section 507B.6 to be, an unfair method of competition, or an unfair or deceptive act or practice in the business of insurance.”

43. Iowa Code § 507B.2(1) defines a “person” as any individual, “and any other legal entity engaged in the business of insurance, including insurance producers and adjusters.” This definition does not distinguish between an insurer’s adjusters and public adjusters.

44. Iowa Code § 507B.6 provides:

Whenever the commissioner believes that any person has been engaged in or is engaging in this state in any unfair method of competition or any unfair or deceptive act or practice whether or not defined in section 507B.4, 507B.4A, or 507B.5 and that a proceeding by the commissioner in respect to such method of competition or unfair or deceptive act or practice would be in the public interest, the commissioner shall issue and serve upon such person a statement of charges in that respect and a notice of a hearing on such charges to be held at a time and place fixed in the notice, which shall not be less than ten days after the date of the service of such notice.

45. Iowa Code § 507B.6A allows the Commissioner to issue a summary order and direct the person to cease and desist from engaging in acts or practices or to take other affirmative action as necessary to comply with Iowa Code chapter 507B.

46. The Commissioner has consistently concluded that the prohibition of unfair acts and practices in Iowa Code § 507B.3 includes acts and practices that offend public policy as established by law and are likely to cause substantial injury to insurance purchasers. *In the Matter of 33 Carpenters Construction, Inc. ("33 Carpenters")*, Division Case No. 105269, 2021

WL 1717542, at \*12 (Iowa Ins. Div., April 19, 2021); *In the Matter of Mark S. Diamond*, Division Case No. 96975, 2019 WL 5677529, at \*38 (Iowa Ins. Div., Oct. 23, 2019); *In the Matter of Newman*, Division Case No. 91936, 2017 WL 6504574, at \*8 (Iowa Ins. Div., Jan. 24, 2017). The Commissioner also considers whether the likely injury is unavoidable and not outweighed by any consumer or competitive benefits. *State ex rel. Miller v. Vertrue, Inc.*, 834 N.W.2d 12, 33–34 (Iowa 2013); *33 Carpenters*, 2021 WL 1717542, at \*12.

47. Iowa Code § 103A.71(3) provides:

A residential contractor shall not represent or negotiate on behalf of, or offer or advertise to represent or negotiate on behalf of, an owner or possessor of residential real estate on any insurance claim in connection with the repair or replacement of roof systems, or the performance of any other exterior repair, exterior replacement, or exterior reconstruction work on the residential real estate.

48. Iowa Code § 103A. 71 (3) prohibits residential contractors from acting as public adjusters. *33 Carpenters Constr., Inc. v. State Farm Life & Casu. Co.*, 939 N.W.2d 69, 80 (Iowa 2020). The Commissioner has previously found that "Iowa's Insurance Trade Practices law would prohibit as an unfair practice any public adjuster or residential contractor from doing indirectly what the law prohibits directly." *33 Carpenters*, 2021 WL 1717542, at \* 10.

49. Performing, offering to perform, or advertising to perform acts that fall under Iowa Code § 522C.2(7), without obtaining proper licensure, and in contravention of Iowa Code § 103A.71, which places limitations on residential contractors, is an unfair trade practice.

50. All or Nothing is and has been a residential contractor within the meaning of Iowa Code § 103A.71 at all relevant times hereto.

51. All or Nothing committed an unfair trade practice by acting as a public adjuster in offering to act as an insurance liaison and to negotiate insurance claims on the behalf of customers in violation of Iowa Code §§ 103A.71(3) and 522C.4.

52. Respondents' acts and practices violated Iowa Code §§ 507B.3 and 522C.4, subjecting Respondents to a summary order requiring Respondents to cease and desist from engaging in such acts or practices, the imposition of a civil penalty, imposition of costs of the investigation and prosecution of the matter, and any other corrective action the Commissioner deems necessary and appropriate pursuant to Iowa Code §§ 505.8, 507B.6, 507B.6A, 507B.7 and 522C.6.

**COUNT III**  
**Unfair Trade Practice**  
**False Advertising**

53. Iowa Code § 507B.4(3)(b)(1) prohibits “false information and advertising” as an unfair method of competition and/or an unfair or deceptive act or practice. This practice includes:

Making, publishing, disseminating, circulating, or placing before the public, or causing, directly or indirectly, to be made, published, disseminated, circulated, or placed before the public in a newspaper, magazine, or other publication, or in the form of a notice, circular, pamphlet, letter, or poster, or over any radio or television station, or in any other way, an advertisement, announcement, or statement containing any assertion, representation, or statement with respect to the business of insurance or with respect to any person in the conduct of the person's insurance business, which is untrue, deceptive, or misleading.

54. All or Nothing committed an unfair trade practice by publishing references and offers on its website that create the impression that All or Nothing provides public adjusting services and is lawfully authorized to do so in Iowa. All or Nothing's Website contains numerous references to negotiating insurance claims, being a partner in the insurance claims process, and providing insurance claims expertise, despite All or Nothing not holding a public adjuster license.

55. All or Nothing committed an unfair trade practice by publishing offers to act as an insurance liaison and stating that it will work closely with insurance companies to expedite the insurance claims process, despite not holding a public adjuster license and having no ability to expedite the insurance process.

56. Campbell, as an officer and owner of All or Nothing, is responsible for the content of All or Nothing's advertising on its website and Facebook. Campbell knew or should have known that these statements were untrue, deceptive, or misleading.

57. Respondents' acts and practices violated Iowa Code §§ 507B.3 and 507B.4, subjecting Respondents to a summary order directing Respondents to cease and desist from engaging in such acts or practices, the imposition of a civil penalty, and any other corrective action the Commissioner deems necessary and appropriate pursuant to Iowa Code § 507B.6A(1); and subjecting Respondents to the imposition of a civil penalty, an order requiring Respondents to cease and desist from engaging in such acts or practices, the imposition of costs of the investigation and prosecution of the matter, and any other corrective action the Commissioner deems necessary and appropriate pursuant to Iowa Code §§ 505.8 and 507B.7.

#### **IV. POLICY REASONS**

58. The role of a public adjuster is to assist the insured in negotiating a fair settlement of an insurance claim. A public adjuster's license imputes specific duties of care and statutory responsibilities that a public adjuster must follow in serving the interests of the insured. An unlicensed public adjuster may not abide by these duties of care or serve the best interests of the insured. Therefore, it is in the public interest for the Commissioner to enforce the insurance laws of the state that require all persons acting as public adjusters to be properly licensed.

59. All or Nothing is an active business and is engaging, and may continue to engage, in the fraudulent and deceptive practices described above. It is contrary to the public interest to permit Respondents to continue to engage in these practices in the state of Iowa.

## V. ORDER

**IT IS THEREFORE ORDERED** that, pursuant to Iowa Code § 522C.6, Respondents and any of their agents, representatives, employees, and officers shall not engage in any act or practice as a public adjuster by directly or indirectly:

- (1) Acting for or aiding an insured in negotiating for or effecting the settlement of any first-party claim for loss or damage to real or personal property of the insured;
- (2) Advertising for the employment of, soliciting the business of, or representing to the public the acting for or aiding an insured in negotiating for or effecting the settlement of first-party insurance claims or that the person is a public adjuster of first-party insurance claims for loss or damage to real or personal property of an insured; or
- (3) Soliciting business investigating or adjusting losses, or advising an insured about first-party claims for loss or damage to real or personal property of the insured.

**IT IS FURTHER ORDERED** that Respondents and any of their agents, representatives, employees, and officers pursuant to Iowa Code §§ 522C.6 and 507B.6A, shall immediately cease and desist from:

- (1) Unfairly or deceptively representing that Respondents have experience in, or will negotiate insurance claims, partner in the insurance claims process, provide insurance claims expertise, or work closely with insurance companies to expedite the claims process; or
- (2) Publishing, disseminating, or circulating, or placing before the public any and all advertisements which offer, or create the impression that Respondents offer, public adjusting services.

**SO ORDERED** on the 23rd day of September, 2024.



DOUGLAS M. OMMEN  
Iowa Insurance Commissioner

**Copies to:**

William Campbell  
14643 Summit Drive  
Clive, Iowa 50325

William Campbell  
984 SW 37<sup>th</sup> Street, Suite 984  
Blue Springs, Missouri, 64015

William Campbell  
1444 Grand Boulevard, Apt. 2020  
Kansas City, Missouri, 64106

All or Nothing LLC  
18151 Alpine Drive,  
Clive, Iowa 50325

Iowa Secretary of State  
321 E. 12<sup>th</sup> Street  
Des Moines, Iowa 50319

**RESPONDENTS**

CERTIFICATE OF SERVICE

The undersigned certifies that the foregoing instrument was served upon all parties to the above cause, or their attorney, at their respective addresses disclosed on the pleadings on September 23, 2024.

By:  First Class Mail  Personal Service  
 Restricted certified mail, return receipt  Email  
 Certified mail, return receipt  \_\_\_\_\_

Signature: /s/ Brooke Hohn  
Brooke Hohn



### **NOTICE OF RIGHT TO REQUEST HEARING**

**YOU ARE NOTIFIED** that you may request a contested case proceeding and a hearing on this matter within thirty (30) days from the date that the order is issued according to Iowa Code § 507A.10. This request must be in writing and filed to the attention of the Enforcement Bureau: [enforcement.filings@iid.iowa.gov](mailto:enforcement.filings@iid.iowa.gov).

If requested, a notice of the hearing shall be prepared by the Division and shall be issued no later than thirty (30) days from the date of receipt of a timely request for a contested case proceeding and hearing. The resulting hearing will be held in accordance with Iowa Administrative Code chapter 191—3.

### **NOTICE OF FINAL ORDER AND 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 become final by operation of law and shall be enforceable by the Commissioner of Insurance in an administrative or court proceeding.

### **NOTICE OF EXHAUSTION OF ADMINISTRATIVE REMEDIES AND RIGHT TO SEEK JUDICIAL REVIEW**

The failure to request a hearing may 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.

### **NOTICE OF PENALTIES FOR VIOLATION OF THIS ORDER**

**YOU ARE NOTIFIED** that a person or insurer who violates this Order shall be deemed in contempt of this Order. The Commissioner may petition the district court to hold a hearing to enforce the order as certified by the Commissioner. The district court may assess a civil penalty against you and may issue further orders as it deems appropriate.