

BEFORE THE IOWA INSURANCE COMMISSIONER
330 Maple Street, Des Moines, Iowa 50319

IN THE MATTER OF)	ORDER AND CONSENT TO ORDER
)	AND AGREEMENT
COVENANT BENEFITS, INC.)	
A/K/A COVENANT ADVISORS)	DIA NO.: 10DOCID018, 1000C-10022
)	DIVISION DOCKET NO.: 66957 <i>11/4/10</i>
NOAH JAMES AULWES A/K/A TOM LEE AULWES))	
A/K/A THOMAS LEE AULWES)	

Now comes the Iowa Insurance Division ("Division"), pursuant to the provisions of the Iowa Uniform Securities Act – Chapter 502 (2009) and Iowa Licensing of Insurance Producers Act - Chapter 522B (2009) regarding the allegations made by the Division as stated in the Cease and Desist Order dated April 5, 2010 and the Statements of Charges dated June 21, 2010 which are incorporated herein by reference. Covenant Benefits, Inc. and Noah James Aulwes, without admitting to or denying these allegations, consent to the entry of this Order and Consent to Order and Agreement (the "Order"). Covenant Benefits, Inc. and Noah James Aulwes ("Aulwes") admit that the Iowa Insurance Division has personal jurisdiction over them and has subject matter jurisdiction over this matter.

AGREEMENT

1. Aulwes's investment adviser representative license and insurance producer license are revoked and he is permanently barred from reapplying for an Iowa investment adviser representative license or insurance producer license. Aulwes agrees to the revocation of his investment adviser representative license and insurance producer license and to being permanently barred from reapplying for an investment adviser representative license or an insurance producer license in the state of Iowa based on the allegations made in the Cease and Desist Order dated April 5, 2010 and the Statement of Charges dated June 21, 2010.

2. **Covenant Benefits, Inc.'s investment adviser license is revoked and it is permanently barred from reapplying for an Iowa investment adviser license.** Covenant Benefits, Inc. agrees to the revocation of Covenant Benefits, Inc.'s investment adviser license and to being permanently barred from reapplying for an investment adviser license in the state of Iowa.

3. **Cease and Desist Order.** Covenant Benefits, Inc. and Aulwes consent to the entry of the Cease and Desist Order issued by the Division on April 5, 2010 which is incorporated herein by reference.

4. **Waiver of Civil Penalty and Costs.** The Division agrees to waive the \$10,000 civil penalty stated in Section H of the Order section and costs in Section I of the Order section for the Cease and Desist Order dated April 5, 2010. The Division also agrees to waive requested costs in the Statement of Charges dated June 21, 2010.

5. **Premise.** Covenant Benefits, Inc. and Noah James Aulwes by entering into this Agreement expressly neither admit to nor deny the allegations made by the Division in the Cease and Desist Order dated April 5, 2010 and the Statement of Charges dated June 21, 2010.

6. **Matters Resolved.** This Agreement resolves all claims made by the Division in, and all claims upon the allegations made by the Division as stated in the Cease and Desist Order dated April 5, 2010 and the Statement of Charges dated June 21, 2010 or which could have been stated based on the matters alleged by the Division in the Cease and Desist Order dated April 5, 2010 and the Statement of Charges dated June 21, 2010.

7. **Other understandings.** Covenant Benefits, Inc. and Aulwes acknowledge the following:

- a. Nothing contained in this Order shall be construed to deprive any person or entity of any private right of action under any law.
- b. Nothing contained in this Order shall be construed to limit the authority of the Division to enforce laws, regulations, or rules against Covenant Benefits, Inc. or Aulwes.
- c. The Iowa Insurance Division reserves its right to take administrative action for any violation of the Iowa insurance or securities statutes and/or regulations unknown to the Division at the date of the signing of this Order.


ORDER

IT IS THEREFORE ORDERED that:

1. Noah James Aulwes' investment adviser representative license and insurance producer license are revoked and he is barred from reapplying for an investment adviser representative license or insurance producer license as stated in item one of the Agreement.
2. Covenant Benefits, Inc.'s investment adviser license is revoked and it is barred from reapplying for an investment adviser license as stated in item two of the Agreement.
3. Covenant Benefits, Inc. and Noah James Aulwes shall Cease and Desist violations of Iowa securities laws and regulations as stated in item three of the Agreement.
4. The \$10,000 civil penalty and costs in the April 5, 2010 Cease and Desist Order are hereby vacated as stated in item four of the Agreement. The requested costs in the June 21, 2010 Statement of Charges are also hereby vacated as stated in item four of the Agreement.

Dated this 24th day of August, 2010.

Iowa Department of Inspections and Appeals



HEATHER L. PALMER
Administrative Law Judge

CONSENT TO ORDER AND AGREEMENT

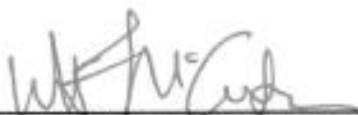
I, Noah James Aulwes, have read, understood, and do knowingly consent to this Order in its entirety. By executing this consent, I understand that I am waiving my rights to a hearing, to confront and cross-examine witnesses, to produce evidence, and to judicial review. I also understand that this Order is considered final administrative action that shall be reported by the Division to the Central Registration Depository, if I am securities licensed, and, if I am insurance licensed, to the National Association of Insurance Commissioners and to all insurance companies with which I am actively appointed. I also understand that this Order is a public record under Iowa Code chapter 22 (2009), that will be disclosed to other state regulatory authorities, upon request, pursuant to Iowa Code section 505.8(6)(c) (2009). I also understand that the information contained in the Order will be posted to the Division's web site and a notation will be made to my publicly available web site record that administrative action has been taken against me.

Dated this 17th day of August, 2010.



Noah James Aulwes

Subscribed and sworn before me by Noah James Aulwes on this 17th day of August, 2010.



Notary Public for the State of Iowa



CONSENT TO ORDER AND AGREEMENT

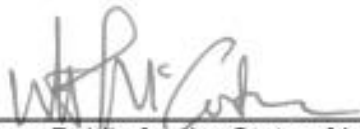
I, Noah James Aulwes, a duly authorized signatory for Covenant Benefits, Inc., have read, understood, and do knowingly consent to this Order in its entirety. By executing this consent, I understand that I am waiving Covenant Benefits, Inc.'s rights to a hearing, to confront and cross-examine witnesses, to produce evidence, and to judicial review. I also understand that this Order is considered final administrative action that shall be reported by the Division to the Central Registration Depository. I also understand that this Order is a public record under Iowa Code chapter 22 (2009), that will be disclosed to other state regulatory authorities, upon request, pursuant to Iowa Code section 505.8(6)(c) (2009). I also understand that the information contained in the Order will be posted to the Division's web site and a notation will be made to my publicly available web site record that administrative action has been taken against the company.

Dated this 17th day of August, 2010.

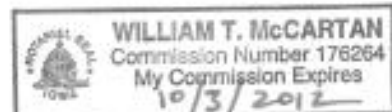


Noah James Aulwes

Subscribed and sworn before me by Noah James Aulwes on this 17th day of August, 2010.



Notary Public for the State of Iowa



Now comes the Enforcement Bureau Chief, Robert Koppin, and states that the attached Order has been approved by the Undersigned.

Dated this 23rd day of August, 2010.

SUSAN E. VOSS
Commissioner of Insurance

A handwritten signature in dark ink, appearing to read "Robert Koppin", is written over a horizontal line.

ROBERT KOPPIN
Enforcement Bureau Chief

BEFORE THE IOWA INSURANCE COMMISSIONER

IN THE MATTER OF)	CEASE AND DESIST ORDER
)	
COVENANT BENEFITS, INC.)	DIVISION FILE NO.:
A/K/A COVENANT ADVISORS)	
NOAH JAMES AULWES)	

Now comes the Iowa Insurance Division ("Division"), pursuant to the provisions of the Iowa Uniform Securities Act – Iowa Code Chapter 502 and finds as follows:

PARTIES AND JURISDICTION

1. The Commissioner of Insurance, Susan Voss, pursuant to Iowa Code § 502.601 (2009), administers the Iowa Uniform Securities Act.
2. Noah Aulwes ("Aulwes") is an individual with last known residential mailing address of 2216 Upland Drive SE, Cedar Rapids, Iowa 52403 and an office address of 136 36th Street SE, Suite A2, Cedar Rapids, Iowa 52403.
3. Covenant Benefits, Inc. a/k/a Covenant Advisors ("Covenant") is an entity with last known mailing of 136 36th Street SE, Suite A2, Cedar Rapids, Iowa 52403. Covenant became licensed as an investment adviser in the state of Iowa on August 30, 2007. Aulwes serves as the president and owner of Covenant.
4. Aulwes is licensed as an investment adviser representative in the state of Iowa with Covenant since August 30, 2007. Prior to his employment with Covenant, Aulwes was a licensed securities agent with ING Financial Partners, Inc. from January 1, 2004 through June 11, 2007. Aulwes was discharged by ING Financial Partners, Inc. for engaging in an outside business activity without providing prior written notice to the firm. Aulwes was suspended by the Financial Industry Regulatory Authority ("FINRA") from associating with any FINRA member in any capacity for one year, starting December 1, 2008 and ending November 30, 2009 and

paid a \$10,000 fine without admitting to or denying the findings. From April 3, 2002 through January 1, 2004, Aulwes was licensed as a securities agent with Locust Street Securities, Inc. From April 29, 1990 through February 28, 2002, Aulwes was licensed as a securities agent with NY Life Securities, Inc. From January 9, 1989 through May 2, 1989, Aulwes was licensed as a securities agent with A.G. Edwards & Sons, Inc. From May 17, 1985 through January 6, 1989, Aulwes was licensed as a securities agent with Shearson Lehman Hutton, Inc.

5. Covenant and Aulwes have engaged in acts or practices within the state of Iowa constituting violations of Iowa Code Chapter 502 and/or any rule or order adopted or issued pursuant to Iowa Code Chapter 502. 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 502 pursuant to Iowa Code § 502.604 (2009).

FACTUAL BACKGROUND

6. Iowa Administrative Rule 191-50.38 provides, in part, that "An investment adviser, investment adviser representative, or a federal covered investment adviser has a *fiduciary duty* to act for the benefit of its clients." (emphasis added).

7. Covenant and Aulwes have solicited and sold to Iowa investors and investors from other states shares of private placement funds through an entity owned by Covenant called the Covenant Investment Fund, L.P. ("CIF"). CIF is purported to be a Delaware limited partnership and Private Equity Fund. Covenant also owns an entity called Covenant Asset Management, Inc. which purports to be a General Partner and the investment manager for CIF.

8. A brochure for CIF states the following regarding CIF and the private placement funds available to investors:

Fund of Funds

Covenant Investment Fund, L.P. (CIF) is primarily a 'Fund of Funds'. Noah Aulwes, (Managing Member) chooses outside private equity managers who fit the investment profile for the individual members who make up the CIF limited partnership. Members then have the option to participate in the various 'side funds' to their liking. The investment risk, return and/or income varies according to the individual side fund(s) chosen.

Ultrasharpe

Ultrasharpe was the first fund added and remains the most popular both by way of safety and posted returns. It is a trading program that seeks to make small incremental profits realized by investing the change of direction of exchange traded funds (ETF's). This process is driven by a time tested proprietary algorithm developed by its manager David Lenihan of Vancouver, Washington. Ultrasharpe targets a 1%/month net return.

Energy Opportunity Fund

The Energy Opportunity Fund attempts to create profits by buying poorly managed or marginally producing properties that are geologically conducive to a well refurbishing (Radial Jet Technology) process which is patented and run by Well Enhancement Service (WES) LLC. Oil wells are refurbished and then resold once the production has been increased. The investor receives both cash flow, tax benefits, as well as capital gains. Double digit returns are expected over an expected two year investment hold.

Venture Capital

One of the distinct advantages of a private equity fund is being able to take advantage of special opportunities that are not available to mutual fund managers. O.S.A.G.I. is a small construction product development company. They produce roofing accessories for nail guns used in both remodeling and new construction. CIF is furnishing the manufacturing and marketing capital for its product(s). In exchange, the investing member will receive a 15% annual income as part of a 30% subordinated return overall. Anticipated holding period one to three years.

Real Estate – Lighthouse Holdings, L.L.C.

Every market environment affords special circumstances where undervalued commodities become attractive as purchases. The recent home mortgage debacle has sent real-estate values plummeting. A 'contrarian' philosophy may consider this an opportunity to buy what is cheap and sell when it comes back

into favor. Lighthouse holdings, LLC looks for distressed properties owned by banks. They buy these notes at a deep discount for later resale. As with any investment, time horizon may be a deciding factor. Current portfolio holdings have a minimum two year commitment.

9. According to documents provided to investors by Millennium Trust Company LLC, the custodian for Covenant investments, investors' monies including retirement account monies have been placed solely or substantially with CIF in one of the four sub-funds. Investor complaints to the Division state that Aulwes solely or substantially steered clients into one or more of CIF's sub-funds without regard to other investments that may involve less risk to the client. Investors' often did not have substantial experience in investing and relied on Aulwes' advise to make money consistent with their desire for safety of principal. These investments with CIF were made without an adequate suitability determination based on a reasonable inquiry into the investors' investment objectives, financial situation and needs, and any other information known to the investment adviser. Covenant and Aulwes failed to maintain written records documenting clients' suitability for an investment in a hedge fund or other investments.

10. Covenant and Aulwes represented in marketing materials and verbally to investors that their investments in the sub-funds were safe and that they would receive positive returns on their investments. Aulwes did not discuss the risk of investing in a hedge fund with clients or downplayed the risk. Several investors have complained that they did not receive disclosure documents on the CIF sub-funds discussing risk until after their investment. Regarding the profitability of the CIF sub-funds, Aulwes told at least one investor that he would make "more money than you know what to do with" on his investments with CIF.

11. Aulwes told Division staff that he became acquainted with David Lenihan ("Lenihan") through a friend at New York Life Insurance Company, whom he had met at church. Lenihan managed the Wavesync fund which later became the Ultrasharpe fund. Lenihan described his investment technique to Aulwes as "pitchers and catchers communicating to each other, and

traders do the same thing." Lenihan's algorithm would determine when the security value would change, but not how much or which direction. Lenihan claimed to have used the algorithm successfully in a day-trading environment and with friends. Lenihan wanted Aulwes to find him clients. Aulwes agreed to market Lenihan's investment program to his clients. However, there is no evidence that Aulwes performed any due diligence on Lenihan's investment program prior to offering it to clients.

12. On information and belief, Covenant and Aulwes charged management fees to clients which were excessive. In an email to the Division dated November 2, 2009, Aulwes stated that he took excessive management fees for his services. Aulwes verbally stated in a conversation with a Division staff member that the excessive management fees were over \$100,000.

13. On information and belief, Aulwes transferred the excessive and unauthorized fees taken from client accounts to his own account(s) and to bank accounts of Aulwes. Aulwes has been unable to repay Covenant and investors for these funds taken for his own personal use.

14. According to the most recent Form ADV dated March 3, 2009, Covenant had approximately \$4.6 million in assets under management. According to a balance sheet for CIF dated September 30, 2009, Covenant has only \$1.55 million under management.

15. Aulwes falsely answered a question on his Form ADV filing made on March 3, 2009 in which he was asked:

E. Has any self-regulatory organization or commodities exchange ever:

(4) disciplined you or any advisory affiliate by expelling or suspending you or the advisory affiliate from membership, barring or suspending you or the advisory affiliate from association with other members, or otherwise restricting your or the advisory affiliate's activities?

Answer: No.

This answer was incorrect, as stated in paragraph 4 above, in that Aulwes was suspended by FINRA for a period of one year. Aulwes did not answer this question correctly.

16. Covenant and Aulwes have made misrepresentations and omissions of material fact to investor(s) including, but not limited to, the following:

- a. misrepresented the investment risk(s) being taken by investors in CIF;
- b. misrepresented the returns being earned by investors on their investment in CIF;
- c. failed to disclose to investors the scope of the investors' risk; and
- d. failed to disclose to investors a timely and adequate accounting of how investor funds were expended.

17. On information and belief, Covenant and Aulwes have approached investors in CIF recently about making an investment in a Philippines gold mine allegedly supported by the Chinese government. Aulwes has traveled to the Philippines to inspect this investment. It is unknown if any offering documents exist for this investment.

VIOLATIONS OF SECURITIES ACT

COUNT I

MISREPRESENTATIONS

18. Paragraphs 1 - 17 are incorporated herein by reference.

19. Covenant and Aulwes have made untrue statements of material fact in the sale of securities.

20. Therefore, Covenant and Aulwes have violated Iowa Code § 502.501 (2009) by making untrue statements of material facts and should be ordered to cease and desist.

21. This action is necessary and appropriate in the public interest and for the protection of investors and consistent with the purposes fairly intended by the provisions of Iowa Code Chapter 502 (The Iowa Uniform Securities Act).

COUNT II
OMISSIONS

22. Paragraphs 1 - 21 are incorporated herein by reference.
23. Covenant and Aulwes have made omissions of material fact in the sale of securities.
24. The omission of these material facts, in light of the circumstances surrounding the sale of securities, is misleading.
25. Therefore, Covenant and Aulwes have violated Iowa Code § 502.501 (2009) by failing to state material facts, and should be ordered to cease and desist.
26. This action is necessary and appropriate in the public interest and for the protection of investors and consistent with the purposes fairly intended by the provisions of Iowa Code Chapter 502 (The Iowa Uniform Securities Act).

COUNT III
UNSUITABLE RECOMMENDATIONS TO CLIENTS

27. Paragraphs 1 - 26 are incorporated herein by reference.
28. Covenant and Aulwes have recommended to a client to whom supervisory, management, or consulting services are provided the purchase, sale, or exchange of any security without reasonable grounds to believe that the recommendation is suitable for the client on the basis of information furnished by the client after reasonable inquiry concerning the client's investment objectives, financial situation and needs, and any other information known by the investment adviser and investment adviser representative.
29. Therefore, Covenant and Aulwes have violated Iowa Code § 502.412(4)(m) (2009) and Iowa Administrative Rule 191-50.38(1)(a) and should be ordered to cease and desist.

30. This action is necessary and appropriate in the public interest and for the protection of investors and consistent with the purposes fairly intended by the provisions of Iowa Code Chapter 502 (The Iowa Uniform Securities Act).

COUNT IV

BOOKS AND RECORDS

31. Paragraphs 1 - 30 are incorporated herein by reference.

32. Covenant and Aulwes have failed to adequately maintain books and records dealing with investments made on behalf of investors.

33. Therefore, Covenant and Aulwes have violated Iowa Code §§ 502.411 (2009) and Iowa Administrative Rule 191-50.42 and should be ordered to cease and desist.

34. This action is necessary and appropriate in the public interest and for the protection of investors and consistent with the purposes fairly intended by the provisions of Iowa Code Chapter 502 (The Iowa Uniform Securities Act).

COUNT V

FILING A FALSE OR MISLEADING STATEMENT ON FORM ADV

35. Paragraphs 1 - 34 are incorporated herein by reference.

36. Aulwes has filed an application or amended an application for registration which was incomplete in any material respect or contained a statement that, in light of the circumstances under which it was made, was false or misleading with respect to a material fact.

37. Therefore, Aulwes has violated Iowa Code § 502.412(4)(a) (2009) and should be ordered to cease and desist.

38. This action is necessary and appropriate in the public interest and for the protection of investors and consistent with the purposes fairly intended by the provisions of Iowa Code Chapter 502 (The Iowa Uniform Securities Act).

COUNT VI

CHARGING EXCESSIVE OR UNAUTHORIZED FEES TO CLIENT ACCOUNTS

39. Paragraphs 1 - 38 are incorporated herein by reference.

40. Covenant and Aulwes have charged excessive or unauthorized fees to client accounts.

41. Therefore, Covenant and Aulwes have violated Iowa Code § 502.412(4)(m) (2009) and Iowa Administrative Rule 191-50.38(1)(j) and should be ordered to cease and desist.

42. This action is necessary and appropriate in the public interest and for the protection of investors and consistent with the purposes fairly intended by the provisions of Iowa Code Chapter 502 (The Iowa Uniform Securities Act).

ORDERS

WHEREFORE, IT IS HEREBY ORDERED pursuant to the powers granted to the Commissioner of Insurance by Iowa Code §§ 502.604 (2009) as follows:

A. Covenant and Aulwes shall Cease and Desist making untrue statements of material facts in the offer or sale of securities in violation of Iowa Code § 502.501 (2009).

B. Covenant and Aulwes shall Cease and Desist omitting material facts which, in light of the circumstances surrounding the sale of securities, are misleading in violation of Iowa Code § 502.501 (2009).

C. Covenant and Aulwes shall Cease and Desist the purchase, sale, or exchange of any security without reasonable grounds to believe that the recommendation is suitable for the client on the basis of information furnished by the client after reasonable inquiry concerning the

client's investment objectives, financial situation and needs, and any other information known by the investment adviser and investment adviser representative in violation of Iowa Code § 502.412(4)(m) (2009) and Iowa Administrative Rule 191-50.38(1)(a).

D. Covenant and Aulwes shall Cease and Desist failing to maintain required books and records in violation of Iowa Code § 502.411 (2009) and Iowa Administrative Rule 191-50.42.

E. Covenant and Aulwes shall Cease and Desist engaging in dishonest and unethical business practices including charging excessive and unauthorized fees to client accounts in violation of Iowa Code § 502.412(4)(m) (2009) and Iowa Administrative Rule 191-50.38(1)(j).

F. Aulwes shall Cease and Desist filing any application or amending any application for registration that was incomplete in any material respect or contained a statement that, in light of the circumstances under which it was made, was false or misleading with respect to a material fact in violation of Iowa Code § 502.412(4)(a) (2009).

G. Covenant and Aulwes shall Cease and Desist engaging in an exempt transaction pursuant to Iowa Code §§ 502.202 and 502.204 (2009).

H. Covenant and Aulwes shall be assessed a civil penalty of \$10,000.00 for knowingly and recklessly violating provisions of the Iowa Uniform Securities Act pursuant to Iowa Code § 502.604(4) (2009) and rules enacted thereunder.

I. The Division shall retain \$5,000 costs from any penalty or payment.

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 section 502.604. The administrator may petition the district court to hold a hearing to enforce the order as certified by the administrator. The district court may assess a civil penalty against the person in an amount not less than three thousand dollars but not greater than ten thousand dollars per violation and may issue further orders as it deems appropriate.

YOU ARE ALSO NOTIFIED that a person who willfully violates any provision of this chapter, or any rule or order under this chapter, is guilty of a class "D" felony pursuant to Iowa Code section 502.605(1)(a). A person who willfully violates section 502.401, 502.402, 502.403, or section 502.408, subsection (1) or (2), resulting in a loss of more than ten thousand dollars is guilty of a class "C" felony pursuant to Iowa Code section 502.605(1)(b).

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 Covenant, Aulwes 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 Robert Koppin, Enforcement 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 (2009).

Dated this 14th day of April, 2010.

Iowa Insurance Division


by PHILLIP S. DEATS
Enforcement Bureau Chief

COPY SENT BY CERTIFIED AND FIRST CLASS MAIL TO:

Covenant Benefits, Inc.
c/o Noah James Aulwes, President
136 36th Street SE, Suite A2
Cedar Rapids, Iowa 52403

Noah James Aulwes
2216 Upland Drive SE
Cedar Rapids, Iowa 52403

Noah James Aulwes
136 36th Street SE, Suite A2
Cedar Rapids, Iowa 52403

