

**BEFORE THE COMMISSONER OF INSURANCE  
OF THE STATE OF KANSAS**

**In the Matter of** )  
**COMPLETE HOME SOLUTIONS,** )  
**YOUR COMPLETE HOME SOLUTIONS, LLC,** ) **Docket No.: 4324-CO**  
**CHS CLAIMS SERVICE,** )  
**NATIONAL CLAIMS SOLUTIONS,** )  
**SERENA KOTALIK,** )  
**and WILLIAM L. ROBERTS,** )  
**Respondents.** )

**CONSENT AGREEMENT AND ORDER**  
**(Pursuant to K.S.A. 77-501 et seq.)**

Pursuant to the authority granted to the Commissioner of Insurance (“Commissioner”) by K.S.A. 40-103 and K.S.A. 77-501 *et seq.*, the Commissioner hereby adopts the stipulations and agreements of the parties and **ORDERS** that **RESPONDENTS** and any and all related entities, however named, **CEASE AND DESIST** from soliciting business as a public adjuster in state of Kansas.

**Findings of Fact**

1. Sandy Praeger is the duly elected, qualified, and acting Commissioner of Insurance for the State of Kansas.
2. Respondent Complete Home Solutions (“Respondent”) is a “claims company” doing business in Kansas, Serena Kotalik (“Kotalik”) is named as the company representative for Complete Home Solutions, LLC., on the company’s contract form, and Respondent William L. Roberts (“Roberts”) supervises employees representing the business, or businesses, in Kansas.
3. Respondents have business addresses of 200 NE Missouri Road, Suite 200, Lee’s Summit, Missouri, and 625 W. Southern Avenue, Mesa, Arizona, and the internet domain name of [www.chsclaims.com](http://www.chsclaims.com).
4. Respondents are also known as Complete Home Solutions, LLC, Your Complete Home Solutions, LLC, National Claims Solutions, and CHS Claims Service.
5. Respondent Roberts owns and operates Respondent entities or is otherwise authorized to act on their behalf.
6. Respondent entities are not registered with the Secretary of State to do business in Kansas under any of the listed entity names.

7. Respondents do not reside in Kansas or maintain an office in Kansas.
8. Respondents do not hold a license or other authority granted by the Commissioner to engage in the business of insurance in Kansas, as a public adjuster or in any other capacity.
9. Through the initial telemarketing call and a follow-up visit by a “claims consultant,” Complete Home Solutions offers to inspect for roof damage, represent the consumer in negotiations with the consumer’s insurance company, and arrange for one of the company’s contracting roofers to repair the damage.
10. The Complete Home Solutions contract provides that the company shall assist the homeowner in “submitting, processing, negotiating, and settling claims with its Homeowner’s Insurance coverage for damage to Homeowner’s roof” in exchange for payment of the full amount of the claim, including deductible, plus any agreed upgrades.
11. Adjusting damage and representing consumers with respect to claims for damage or loss covered by insurance is acting as a public adjuster, as the term is uniformly understood in the business of insurance, and is insurance business.
12. Respondents are engaging in the business of insurance in Kansas without having established competency, accountability, and trustworthiness, and Respondents lack a presence in Kansas that would provide an aggrieved consumer a realistic source of recovery; thus, the activities of Respondents in Kansas pose a risk of financial harm to Kansas consumers.
13. On June 22, 2011, KID issued an Emergency Order directing that Respondents cease and desist from doing business in Kansas and served notice of a hearing pursuant to K.S.A. 77-536.
14. Respondent William L. Roberts, individually and on behalf of Complete Home Solutions, Your Complete Home Solutions, LLC, CHS Claims Service, and National Claims Service, understands the right to have a hearing on the facts and disposition and to seek administrative and judicial review of an adverse order in this matter.
15. Respondent Roberts, individually and on behalf of Respondent entities, waives hearing and administrative and judicial review.
16. Respondent Roberts, individually and on behalf of Respondent entities, stipulates to the foregoing statements of fact, for the purposes of this Consent Agreement and Order only, and agrees not to engage in the business of insurance as a public adjuster in the state of Kansas.
17. Respondent Kotalik acts under the direction of Respondent Roberts and therefore should be dismissed from this action.

### **Conclusions of Law**

18. The Commissioner has general supervisory authority over the business of insurance, K.S.A. 40-103, and is “charged with the administration of all laws relating to insurance, insurance companies and fraternal benefit societies doing business in this state, and all other duties which are or may be imposed upon such officer by law,” K.S.A. 40-102.

19. Respondents’ conduct involves the business of insurance.

20. Respondents’ business is unauthorized and poses a risk of harm to Kansas insurance consumers, and any other loss payees.

21. The Commissioner has jurisdiction over Respondents as well as the subject matter of this proceeding, and such proceeding is held in the public interest.

### **Stipulation**

The undersigned stipulate and agree to the above findings fact and conclusions of law and waive all rights to administrative hearing and judicial review of the Commissioner’s Order.

/s/ William L. Roberts\_\_\_\_\_ 7-20-2011\_\_\_\_\_  
William L. Roberts                      Date  
Respondent, Individually and on  
Behalf of Respondent Entities

Prepared by and Approved by:

/s/ Brenda J. Clary\_\_\_\_\_  
Brenda J. Clary  
Staff Attorney, KID

**IT IS THEREFORE ORDERED BY THE COMMISSIONER OF INSURANCE THAT**

- 1. This action is dismissed as to Serena Kotalik, and**
- 2. William L. Roberts, and Complete Home Solutions and any of its agents and related entities, however identified and named, CEASE AND DESIST from soliciting or accepting engagement to represent insurance consumers in negotiating and settling claims for losses to property covered by contracts of insurance in the state of Kansas.**

**IT IS SO ORDERED THIS 28th DAY OF JULY 2011, IN THE CITY OF TOPEKA, COUNTY OF SHAWNEE, STATE OF KANSAS.**



/s/ Sandy Praeger  
Sandy Praeger  
Commissioner of Insurance

BY:

/s/ Zachary J.C. Anshutz on behalf of  
Robert M. Tomlinson  
Assistant Commissioner  
Presiding Officer

**NOTICE OF RIGHTS**

In the event Respondents file a petition for judicial review, pursuant to K.S.A. 77-613(e), the petition must be filed within 30 days of the date of service of this order. The agency officer to be served on behalf of the Kansas Insurance Department is:

Zachary J.C. Anshutz, General Counsel  
Kansas Insurance Department  
420 S.W. 9<sup>th</sup> Street  
Topeka, Kansas 66612

**Certificate of Service**

The undersigned hereby certifies that she served a true and correct copy of the above and foregoing **Consent Agreement and Order** on this \_\_28<sup>th</sup>\_\_ day of July 2011, by causing the same to be placed in the United States Mail, first class postage prepaid, addressed to the following:

William L. Roberts  
Complete Home Solutions  
200 NE Missouri Road, Suite 200  
Lee's Summit, MO 64086

And

William L. Roberts  
Complete Home Solutions  
625 W. Southern Avenue  
Mesa, AZ 85210

And

Serena Kotalik  
Complete Home Solutions  
200 NE Missouri Road, Suite 200  
Lee's Summit, MO 64086

\_s/ Brenda J. Clary\_\_\_\_\_

Brenda J. Clary, #18770  
Staff Attorney  
Kansas Insurance Dept.