

**BEFORE THE COMMISSIONER OF INSURANCE
OF THE STATE OF KANSAS**

**In the Matter of the Kansas
Resident Insurance Agent's
License of DENNIS L. SWINNEY
NPN #928811**

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Docket No. 76868

FINAL ORDER

(Pursuant to K.S.A. 40-4909 and K.S.A. 77-501 *et seq.*)

The Presiding Officer called this matter for an evidentiary hearing on May 22, 2019. Dennis L. Swinney ("Respondent") appeared by and through his attorney James G. Chappas, and the Kansas Insurance Department (the "Department") appeared by and through its staff attorney, Steven M. Lehwald. The Respondent did not dispute the facts alleged by the Department or the applicable law but requested an opportunity to present mitigating evidence on disposition and request leniency from the Commissioner.

Having considered the evidence and arguments of the parties, the Commissioner finds the evidence supports the Department's revocation of the agent license of Respondent, Dennis L. Swinney.

Findings of Fact

1. Respondent obtained a Kansas resident insurance agent license on January 23, 1985, and remains licensed to date.
2. Respondent's legal (residential) address of record is 3 19th Terrace, Hutchinson, KS 67502-3518.
3. On January 30, 2019, the Department received an anonymous tip alleging that Respondent was charged with distributing methamphetamines (Meth) in Reno County,

Kansas in 2018. The tipster provided a newspaper article detailing the arrest and surrounding circumstances.

4. The Department staff researched the matter and found that Respondent had the following conviction:

August 29, 2018, Reno County District Court, Case No. 2018-CR-000156, Obstructing Apprehension or Prosecution (felony).

5. Respondent's sentencing date was October 12, 2018.

6. Respondent was sentenced to 18 months of probation with an underlying prison term of eight months.

7. The Department issued a Summary Order dated February 6, 2019, proposing to revoke the Respondent's license.

8. Respondent filed a timely request for a hearing.

9. The Presiding Officer is the Assistant Commissioner of Insurance acting on behalf of the Commissioner of Insurance as the agency head as provided in K.S.A. 77-547.

10. At the request of Respondent's counsel, a status conference was held March 27, 2019.

11. A prehearing conference was held April 12, 2019. The Respondent's counsel indicated he would call a witness at the evidentiary hearing for purposes of presenting a "probation plan" to the Department to consider in lieu of revocation of the Respondent's license. Counsel explained he wanted the Presiding Officer to consider, if some form of discipline was warranted, that supervision by the proposed witness could be an option. The Presiding Officer directed that any proposed probation or supervision plan (Proposed Plan) be submitted to the Department and the Presiding Officer prior to the evidentiary hearing so that it could be discussed at the hearing. The Respondent was directed to have the Proposed Plan submitted to the Department by May 15, 2019. A Proposed Plan was not submitted as directed.

12. At the evidentiary hearing the Respondent stipulated to an August 29, 2018, felony conviction of Obstructing Apprehension or Prosecution (Reno County District Court, Case No. 2018-CR-000156). The respondent was sentenced on October 12, 2018, to 18 months of probation with an underlying prison term of eight months. A transcript of the Plea Hearing indicates Mr. Swinney admitted that he did “knowingly harbor, counsel or aid Amanda Swinney knowing that she was a defendant who committed a felony of distribution of methamphetamine with the intent that she avoid or escape from arrest or conviction for said felony.”

13. The Respondent testified he was unaware that K.A.R. 40-7-9 requires an agent to notify the Department of a misdemeanor or felony conviction within 30 days of occurrence. He indicated he believed he was only required to report address changes.

14. As background for his felony conviction, the Respondent testified that his daughter, Amanda Swinney, who is now 34 years old, has had problems with drugs since she was 19 years old and unsuccessfully has sought treatment in five different rehabilitation programs for which Respondent has paid. Respondent was a co-owner with his daughter of a house in which his daughter lived which was being purchased on contract. The Respondent indicated the house had been confiscated by the county under drug forfeiture laws.

15. Originally Mr. Swinney was arrested and charged, along with six other people (including his daughter), for conspiracy to distribute Meth in late 2017. Information presented at the evidentiary hearing indicated investigators had observed Amanda Swinney driving the Respondent’s car to facilitate acts which they believed were associated with distributing drugs, that a co-conspirator had told sheriff officers that Respondent was aware of Amanda

Swinney's activities, and that the co-conspirator had personally given the Respondent money and drugs to keep in Respondent's safe in his home.

16. The Respondent testified he believed he was arrested as a conspirator because he was a co-owner of the house his daughter lived in and was using in the commission of drug offenses, and because he had helped her rent a car which she used to transport drugs. He said he has never used drugs or been involved in selling drugs and denied knowledge of his daughter's drug activities.

17. Respondent testified that on October 5, 2017, Amanda Swinney was arrested in Harvey County while in possession of a quantity of Meth. Her car was seized by law enforcement under drug forfeiture laws. Amanda told Respondent that because she would be going to court on the Harvey County charges she needed to find a job. Respondent testified that because his daughter was facing drug charges he believed she was "done" with drugs, so he allowed her to use his car for the purpose of seeking employment. The Respondent had undergone hip replacement surgery on September 27, 2017, and was homebound at the time. He testified that he needed to use his car to go to a doctor's appointment on October 10, 2017, so helped Amanda rent a car purportedly to continue to seek employment. Respondent indicated in a statement to the Department:

"[Amanda] went . . . to rent a car and told me she was paying for it herself so that she could look for jobs while she was in trouble going thru [sic] court. I thought she was being honest because she had just been charged[.] I did not know she was going to use it for more drug activity. . . . [E]ven though she was paying for it I would have to sign also because they needed my car insurance in case she had a wreck."

After renting the vehicle Amanda drove to Wichita to procure Meth. She was stopped by law enforcement in Reno County where a search of the vehicle uncovered a quantity of Meth.

18. The Respondent indicated he entered into the plea agreement on the advice of his counsel because three other defendants in the case also entered into plea agreements, if his case went to trial with the other defendants and he was convicted he could possibly be sentenced to time in prison, and he could save \$7,000 in legal fees if he didn't have his case tried.

19. While Amanda was in jail, Respondent facilitated telephone communications between her and another co-conspirator being held in jail, Leroy Lowe, whom Respondent identified as his daughter's fiancé. This was done by his daughter and Lowe calling separate cell phones from their respective jail facilities and Mr. Swinney holding the phones together. He knew that jail policy prohibited such communications between inmates, that it was wrong for him to facilitate it, and he could lose his jail visitation rights with his daughter as a result.

20. Respondent acknowledged he had a misdemeanor conviction in 2016 of Disorderly Conduct which appeared on his pre-sentence investigation report in the 2018 felony matter. This was not reported to the Department.

21. Evidence was presented that the Respondent has had a long and successful career as an insurance agent, having worked for multiple agencies in different cities.

22. Several letters were presented during the hearing from customers and friends of the Respondent attesting to his character and competence as an insurance agent. In addition, an email from Amanda Swinney was presented which represented that her father was unaware of her drug activities and she had lied to him about using his vehicle and a rental vehicle to seek employment when the real purpose was to transport drugs.

23. Respondent's counsel asked the Presiding Officer to consider that revocation of Respondent's license was not mandatory but was within the Commissioner's discretion. He

asked that consideration be given to Respondent's nearly 35-year history of providing satisfactory service to clients and that there was no indication that his actions harmed any of his clients. He was not accused of having committed any fiduciary fraud or theft against any clients. The 2018 conviction was a level eight non-person felony which he argued did not warrant license revocation. Counsel urged the Presiding Officer to allow the Respondent to continue to serve the needs of his clients as they would be unfairly harmed if the Respondent's license was revoked.

24. Due to shortness of time, the Respondent was not able to call a witness who was to testify by phone regarding a supervision plan, which Respondent's counsel wanted to propose. Due to this, the Presiding Officer indicated she would allow the parties a period of time after conclusion of the evidentiary hearing to work together to develop a plan which the Presiding Officer could take into consideration. Accordingly, an order was issued allowing the parties until July 22, 2019, to present information in support of alternatives to revocation.

25. On July 22, 2019, the Respondent's attorney submitted to the Assistant Commissioner of Insurance a proposed probationary plan for the Respondent.

26. The Department filed an objection to the proposed probation plan on the basis that the Department had not agreed to the proposal.

Applicable Law

27. K.S.A. 40-4909(a) provides, in part, that the commissioner may revoke an agent license, if the commissioner finds that the Respondent has violated any regulation promulgated under chapter 40 of the Kansas Statutes Annotated or been convicted of a felony. K.S.A. 40-4909(a)(2) and (6).

28. K.A.R. 40-7-9 requires that an insurance agent report to the Department, within 30 days of occurrence, all details of any conviction of a misdemeanor or felony. K.A.R. 40-7-9(d).

29. Under K.S.A. 40-4909(b) the Commissioner may revoke an insurance agent license if the commissioner finds that the insurable interests of the public are not properly served under such license.

30. Pursuant to K.S.A. 40-4909(a), the Commissioner “may revoke, suspend, or deny the license of a person who has “been convicted of a misdemeanor or felony,” K.S.A. 40-4909(a)(6). Neither the legislature or the Kansas Supreme Court has set forth the factors the Commissioner should consider when exercising his or her discretion under K.S.A. 40-4909(a)(6). However, the Commissioner can take guidance from the nonexclusive list of factors set out in K.S.A. 72-2165(c) to be considered by the Kansas State Board of Education in licensing decisions for persons who have committed certain criminal offenses. Those factors are:

1. The nature and seriousness of the offense or act;
2. The conduct of the person subsequent to commission of the offense or act;
3. The time elapsed since the commission of the offense or act;
4. The age of the person at the time of the offense or act;
5. Whether the offense or act was an isolated or recurring incident; and
6. Discharge from probation, pardon or expungement.

31. The Kansas Supreme Court has not had occasion to discuss the factors the Commissioner should consider when exercising his or her discretion under K.S.A. 40-4909(a)(6), but it has listed the factors to be considered in determining whether a former attorney should be readmitted to the practice of law. They are:

- (1) the present moral fitness of the petitioner;
- (2) the demonstrated consciousness of the wrongful conduct and disrepute which the conduct has brought the profession;
- (3) the extent of petitioner's rehabilitation;
- (4) the seriousness of the original misconduct;
- (5) conduct subsequent to discipline;
- (6) the time elapsed since the original discipline;
- (7) the petitioner's character,

maturity and experience at the time of the original discipline; and (8) the petitioner's present competence in legal skills. *State v. Russo*, 210 Kan. 5, 6, 630 P.2d 711 (1981).

The Kansas Supreme Court held that the factors applied in considering reinstatement to practice law were equally relevant to the practice of medicine. *Vakas v. Kansas Bd. of Healing Arts*, 248 Kan. 589, 600, 808 P.2d 1355, 1364 (1991). The factors cited in *Russo* and *Vakas* are substantially similar to those set forth in K.S.A. 72-2165(c). The Commissioner considers the list of factors set out in 72-2165(c) and direction given on the exercise of discretion in reinstating legal and medical licenses to be applicable in considering the granting or revocation of an insurance agent license.

32. Pursuant to K.S.A. 77-526(a), the Assistant Commissioner of Insurance acting on behalf of the Commissioner of Insurance as the agency head, as provided in K.S.A. 77-547, is empowered to render a Final Order.

Policy Reasons

33. The Commissioner is charged with determining the fitness of an applicant to be issued an insurance agent license in order to protect consumers purchasing insurance in the State of Kansas.

34. The Commissioner may revoke an insurance agent license if the Commission determines that the insurable interests of the public are not properly served under that license.

35. It is in the public interest that the license of an agent who has recently been convicted of a felony be revoked.

36. It is in the public interest that the license of an agent who failed to notify the Department of a felony conviction be revoked.

Discussion

37. The Presiding Officer believes it will be beneficial to address the factors set forth in K.S.A. 72-2165(c) and *Vakas*. Only those factors which are relevant in this matter need to be addressed.

38. First, “the nature and seriousness of the offense or act,” which is substantially the same as the *Vakas* factor “the seriousness of the original misconduct.” The Respondent specifically admitted in court that he did “knowingly harbor, counsel or aid Amanda Swinney knowing that she was a defendant who committed a felony of distribution of methamphetamine with the intent that she avoid or escape from arrest or conviction for said felony.” Thus the Presiding Officer does not accept the argument that the Respondent’s conduct, being a “level 8 non-person felony,” was not a serious crime. Although his acts did not result in *actual* harm to or put into jeopardy any insurance clients, it had the potential to, particularly had the Respondent been sentenced to a period of incarceration. It is not a persuasive argument that in licensing decisions the Commissioner should ignore felony convictions that don’t involve direct harm to insurance clients or consumers.

The 2016 misdemeanor conviction of disorderly conduct is not considered serious by the Presiding Officer for the purposes of this factor, although it should have been reported to the Department.

39. Second: “The conduct of the person subsequent to commission of the offense or act,” which is substantially the same as the *Vakas* factor of “conduct subsequent to discipline.” The Respondent admitted knowing it was illegal for him to facilitate calls between his imprisoned daughter and her imprisoned co-conspirator. These calls occurred after the Respondent’s arrest on the conspiracy charges. He acknowledged doing this despite understanding it

violated jail policy and he risked losing visitation privileges with his daughter. This indicates a pattern of knowingly committing wrongful acts. The failure of the Respondent to notify the Department of his felony conviction (as well as the subsequently revealed 2016 Disorderly Conduct misdemeanor) is also conduct that weighs against him.

40. Third: “The time elapsed since the commission of the offense or act,” has the same intent as the *Vakas* factor of “the time elapse since the original discipline.” The Respondent’s sentencing for the conviction occurred in October 18, 2018, and he was still on probation at the time of the evidentiary hearing. His failure to report the conviction occurred during the same time frame. An insufficient amount of time has passed since the conviction and the facilitation of calls between his daughter and another inmate for the Commissioner to be able to conclude that the Respondent will not engage in similar conduct in the future.

41. Fourth: “The age of the person at the time of the offense or act,” is akin to the *Vakas* factor of “the petitioner's character, maturity and experience at the time of the original discipline.” The Respondent was a mature adult with a long history in the insurance industry at the time of his conviction. He had the experience and maturity to understand that the original conspiracy charge was serious and he elected to plead guilty to the obstruction charge. He also had sufficient experience as a licensed insurance agent that he should have known of his responsibility to report a felony conviction to the Department.

42. Fifth: “Whether the offense or act was an isolated or recurring incident.” Aside from the 2016 disorderly conduct misdemeanor conviction, there is no evidence that Applicant engaged in conduct similar to that giving rise to his conviction prior to his arrest. However, as noted before, subsequent to his arrest, the Respondent facilitated calls between his imprisoned daughter and her imprisoned co-conspirator although he knew it was wrong to

do so. This raises a concern as to whether the Respondent will continue to engage in conduct he knows or should know is wrong, particularly if the situation involves his daughter.

43. Sixth: “Discharge from probation, pardon or expungement,” which is similar to the *Vakas* factor of “the extent of the petitioner’s rehabilitation.” As indicated previously, the Respondent’s sentencing for the conviction occurred in October 18, 2018, and he was still on probation at the time of the evidentiary hearing.

44. Another *Vakas* factor which is applicable is “the demonstrated consciousness of the wrongful conduct and disrepute which the conduct has brought the profession.” The Respondent did not did not take personal responsibility for the conduct which led to his conviction. Instead, he indicated that he was not guilty of what he was accused of because he was not aware of his daughter’s drug activities. He further testified he only pled guilty in order to avoid a possible prison sentence and the cost of trial. In a statement to the Commissioner, the Respondent said:

“I have never used drugs or sold drugs in my life but because of the rental and the house [his daughter] lived in I was charged. I guess I was a bad father because I was trying to get my daughter off drugs and helped her have a safe place to live.”

It is evident that the Respondent’s actions were done out of concern for his daughter and a desire to help her past her drug addiction issues. While the Respondent may claim he is innocent of any felony acts, the Commissioner cannot ignore the Respondent’s admission of committing the conduct underlying the obstruction felony charge. Moreover, the Commissioner cannot ignore the Respondent’s facilitation of calls between his daughter and a co-conspirator, despite his knowledge at the time that doing so was wrong.

It is also a concern that the Respondent’s arrest cast a poor light on other licensed insurance agents. Insurance consumers should have confidence that agents licensed by the

Department have not had recent felony convictions. This is precisely why there is a requirement that licensee's notify the Department of any felony or misdemeanor convictions. The Department has a responsibility to insurance consumers to determine whether conduct giving rise to a felony conviction creates a concern about the licensee's fitness to sell insurance to the public.

Findings of Fact and Conclusions of Law

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

46. The Assistant Commissioner of Insurance acting as the Presiding Officer on behalf of the Commissioner of Insurance as the agency head is empowered to render a Final Order.

47. The Commissioner has considered the factors in K.S.A. 72-2165(c) and *Vakas* factors most favorable to Respondent, specifically that he had a long and successful insurance career, that many clients sent letters in support of the Respondent and commending him on the service he provided, that he has tried many times to help his daughter overcome her drug addiction problems, that his daughter told him she was looking for a job when instead she was using vehicles he provided in furtherance of drug activities, and that he did not intentionally withhold information about his felony conviction or prior misdemeanor conviction from the Department.

48. The Commissioner has considered the factors that weigh most heavily against Respondent, specifically that he pled guilty to a serious felony by knowingly assisting his daughter with the intent to prevent her arrest (which involves elements of dishonesty), that he subsequently facilitated prohibited communications between his incarcerated daughter and another incarcerated person, that the Respondent has a duty to know and comply with Kansas

insurance licensing requirements, and that he failed to report his felony conviction (as well as his 2016 misdemeanor conviction) to the Department as required by insurance regulations.

49. The Commissioner has empathy for the situation involving the Respondent and his daughter. It is understandable that a parent would want to assist an adult child with addiction issues, even when those difficulties continue over a number of years. It is commendable that the Respondent tried in numerous ways to help his daughter. However, it is not acceptable to turn a blind eye to what a reasonable person should know or understand. Two things are particularly problematic. The Respondent claims that he was not aware of his daughter's drug activities (or intended drug activities) during the first part of October 2017. However, he had actual knowledge that she had been arrested (and had her vehicle seized) for transporting a half pound of Meth on October 5, 2017. Nevertheless, on October 10, 2017, he assisted her with renting a vehicles in which she was later arrested and found to again be transporting drugs. Despite Amanda's claims of needing a vehicle to look for employment and that she was "done" with drugs, it is not credible for the Respondent to claim he didn't have reason to believe his daughter was involved in drug activities or was likely to continue to be involved in drug activities when she had been arrested *five days earlier* for transporting drugs. This is in addition to his knowledge of her fifteen-year history of drug addiction and numerous unsuccessful attempts at drug rehabilitation.

50. Even more problematic is the Respondent's actions to facilitate illegal communications between his incarcerated daughter and an incarcerated co-conspirator. He stated he knew it was wrong but did it anyway. It appears that when the Respondent's daughter is involved, the Respondent is willing to do what she requests, regardless of his knowledge that what he is doing is wrong and carries severe consequences. This gives rise to a concern that the

Respondent may be tempted to engage in other wrongful conduct at his daughter's behest which could ultimately cause harm his insurance clients.

51. The Commissioner is not persuaded that the Respondent should be allowed to continue to sell insurance under the "proposed probationary plan." Aside from the Department not having agreed to the plan, it does not provide safeguards which would assuage the concern that the Respondent would not again commit wrong or illegal acts in order to assist his daughter.¹

¹ The Commissioner rejection of the Proposed Probation Plan filed by the Respondent is also based on the following:

At the pre-hearing conference, the Respondent's counsel indicated he would call a witness at the evidentiary hearing for purposes of presenting a "probation plan" to the Department to consider in lieu of revocation of the Respondent's license. The Presiding Officer directed that any proposed probation or supervision plan (Proposed Plan) be submitted to the Department and the Presiding Officer prior to the evidentiary hearing so that it could be discussed at the hearing. The Respondent was directed to have the Proposed Plan submitted to the Department by May 15, 2019.

A Proposed Plan was not submitted by Respondent's counsel prior to the evidentiary hearing. At the hearing, counsel again indicated he planned to call a witness (via telephone) to testify as to a possible plan which the Presiding Officer could consider in lieu of revocation of the Respondent's license. He acknowledged the Presiding Officer had requested a proposal submitted in writing prior to the hearing but he (counsel) didn't think he needed to do that because the specifics of the proposal could be provided via the witness's testimony.

The Presiding Officer indicated it was her intent that Respondent submit a proposal that the Department and Respondent's counsel could discuss and reach a consensus on prior to the evidentiary hearing, which could then be discussed with the Presiding Officer during the hearing. She indicated she would take the matter under advisement based on information provided at the hearing.

The allotted time for the hearing expired prior to the witness being called to testify with regard to the Respondent's Proposed Plan. The Presiding Officer adjourned the hearing and provide Respondent's Counsel and the Department an opportunity to work together to reach consensus on a Proposed Plan. Following the conclusion of the evidentiary hearing, an order was issued to allow parties until July 22, 2019, to present information in support of alternatives to revocation.

Prior to July 22, 2019, the Presiding Officer was notified by the Department's counsel that Department staff and Mr. Swinney, though his counsel, were not able to agree on a joint resolution or plan regarding supervision of the Respondent as an alternative to revocation of Mr. Swinney's license. However, on July 22, 2019, Respondent's counsel submitted a Proposed Probation Plan to the Presiding Officer. The Department filed an objection to the plan.

The Presiding Officer made it clear to Respondent's counsel during the evidentiary hearing that any proposal for supervision or probation needed to be agreed to by Department Staff before it would be considered by the Presiding Officer. For any supervisory plan to be effective, the Department must be comfortable with its terms and conditions and have confidence that it will result in credible supervision of the Respondent for the protection of consumers in the state. Even if the Presiding Officer believed revocation of the Respondent's license is not warranted, and wanted to consider some form of discipline in lieu of revocation (which is not the case), she is unwilling to force the Department to be bound by a plan which is unilaterally proposed by the Respondent. The Respondent's failure to submit a plan that had been approved or agreed to by the Department precludes it from serious consideration by the Commissioner.

DECISION

52. The Commissioner has jurisdiction over **DENNIS L. SWINNEY** as well as the subject matter of this proceeding, and such proceeding is held in the public interest.

53. The Commissioner finds that Respondent's Kansas license may be revoked because **DENNIS L. SWINNEY** has been convicted of a felony.

54. The Commissioner finds that Respondent's Kansas license may be revoked because he failed to report the convictions to the Department.

55. The Commissioner finds, pursuant to K.S.A. 40-4909(b), that the interests of the public are not properly served under Respondent's license.

56. Accordingly, the Commissioner concludes that sufficient grounds exist for the revocation of the insurance agent's license of **DENNIS L. SWINNEY**, pursuant to K.S.A. 40-4909(a) and (b).

IT IS THEREFORE ORDERED BY THE COMMISSIONER OF INSURANCE THAT:

57. The Kansas resident insurance agent's license of **DENNIS L. SWINNEY** is hereby REVOKED the effective date of this Order.

58. IT IS FURTHER ORDERED that **DENNIS L. SWINNEY** shall **CEASE** and **DESIST** from the sale, solicitation or negotiation of insurance and/or receiving compensation derived from the sale, solicitation or negotiation of insurance conducted after the effective date of this Order.

[Signature on following page.]

IT IS SO ORDERED THIS 30th DAY OF AUGUST 2019, IN THE CITY OF
TOPEKA, COUNTY OF SHAWNEE, STATE OF KANSAS.



VICKI SCHMIDT
COMMISSIONER OF INSURANCE

BY: Barbara W. Rankin
Barbara W. Rankin
Assistant Commissioner
Presiding Officer

NOTICE

Pursuant to K.S.A. 77-601 *et seq.*, Applicant is entitled to judicial review of this Final Order. The petition for judicial review must be filed within thirty (30) days of service of this Final Order (plus three [3] days for service by mail pursuant to K.S.A. 77-531). In the event Applicant files a petition for judicial review pursuant to K.S.A. 77-613(e), the Agency Officer to be served on behalf of the Kansas Insurance Department is:

Justin L. McFarland, General Counsel
Kansas Insurance Department
420 SW 9th Street
Topeka, KS 66612

CERTIFICATE OF SERVICE

I hereby certify that I served a true and correct copy of the above-and foregoing Final Order upon Applicant by causing a copy of the same to be deposited in the United States mail, first class postage prepaid, on the 30th day of August 2019, addressed to the following:

Dennis L. Swinney

[REDACTED]

Hutchinson, KS [REDACTED]

Respondent

and

James G. Chappas

James G. Chappas, Chartered

1501 SW Topeka Blvd.

Topeka, KS 66612

Attorney for Respondent

and hand-delivered to the following:

Steven M. Lehwald

Staff Attorney

Kansas Insurance Department

420 S.W. 9th Street

Topeka, KS 66612-1678


Toni Garrard
Senior Administrative Assistant