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CHIEF FINANCIAL OFFICER
JEFF ATWATER
STATE OF FLORIDA

IN THE MATTER OF:

CHARLES FRANKLIN FISTEL

CASE NO.: 133591-14-AG

ORDER OF SUSPENSION

THIS PROCEEDING came on for final agency action and the Chief Financial Officer or his designee, having considered the record in this case and the Administrative Complaint and being fully advised in the premises, finds that:

1. Charles Franklin Fistel, license number E004606, currently holds the following Florida insurance licenses: life, including variable annuity agent and life insurance agent.
2. On August 11, 2014, an Administrative Complaint (complaint), which is attached to this Order of Suspension and labeled "Exhibit A," was issued against Charles Franklin Fistel. The one count complaint alleged that agent Fistel submitted a fraudulent life insurance application to an insurer in order to conceal that the life insurance policy was to be ultimately sold to a third party who lacked an insurable interest in the life of the insured.
3. Charles Franklin Fistel was notified in the complaint of the right to request a proceeding in accordance with sections 120.569 and 120.57, Florida Statutes, and that failure to answer the complaint or to request a proceeding within twenty-one (21) days would result in the imposition of a penalty.

4. In accordance with section 120.60(5) , Florida Statutes, the complaint was served upon Charles Franklin Fistel by personal service on November 12, 2014. A true and correct copy of the Affidavit of Service is attached to this Order of Suspension and labeled "Exhibit B."

5. Charles Franklin Fistel failed to answer the complaint or to request a hearing in accordance with sections 120.569 and 120.57(1), Florida Statutes, or section 120.57(2), Florida Statutes.

6. Based upon Charles Franklin Fistel's failure to respond to the complaint or to request a hearing, the Chief Financial Officer finds that an Order of Suspension should be entered in this case.

FINDINGS OF FACT

7. The factual allegations in the complaint are deemed admitted, fully incorporated by reference in this Order of Suspension, and adopted as the Department's Findings of Fact in this case.

CONCLUSIONS OF LAW

8. Based upon the Findings of Fact adopted in this Order of Suspension, the Department concludes that Charles Franklin Fistel violated the specific statutes and rules charged in each count of the attached complaint and the Department adopts the violations charged in each count of the complaint as the Conclusions of Law in this case.

PENALTY IMPOSED

9. The failure of Charles Franklin Fistel to answer the Complaint or to request a proceeding, taken together with the Findings of Fact and Conclusions of Law adopted in this

Order of Suspension, constitute grounds for the Chief Financial Officer to suspend Charles Franklin Fistel's insurance licenses and appointments.

IT IS THEREFORE ORDERED that:

(a) All licenses, appointments and eligibility for licensure heretofore issued to Licensee, Charles Franklin Fistel, within the purview of the Department of Financial Services, are hereby SUSPENDED for a period of nine (9) months.

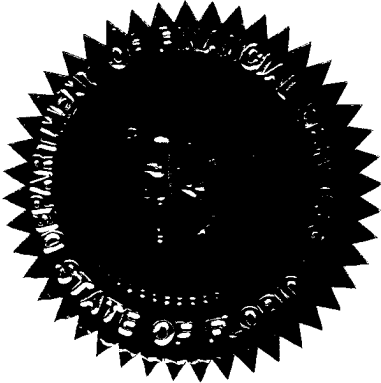
(b) Charles Franklin Fistel does not have the right to apply for reinstatement of his licenses or appointments under the Florida Insurance Code for nine (9) months from the filing date of this Order of Suspension. The Department shall not reinstate any of Charles Franklin Fistel's licenses or appointments or reinstate eligibility to hold such licenses or appointments if it finds that the circumstance(s) for which the licenses were suspended still exist or are likely to recur.


(c) During the period of suspension, Charles Franklin Fistel shall not engage in or attempt or profess to engage in any transaction or business for which a license or appointment is required under the Florida Insurance Code or directly or indirectly own, control, or be employed in any manner by any insurance agent or agency or adjuster or adjusting firm.

(d) Charles Franklin Fistel shall return to the Department of Financial Services, Bureau of Licensing, 200 East Gaines Street, Tallahassee, Florida 32399-0319, within ten (10) calendar days of the issuance of this order, all licenses issued pursuant to the Florida Insurance Code.

(e) Any person who knowingly transacts insurance or otherwise engages in insurance activities in this state without a license, or while the license(s) is/are suspended or revoked, commits a felony of the third degree.

DONE and ORDERED this 27th day of January, 2015.




Gregory Thomas
Director, Agent & Agency Services

NOTICE OF NOTICE OF RIGHTS

Any party to these proceedings adversely affected by this Order is entitled to seek review within **thirty (30) days** of the rendition of this Order, pursuant to section 120.68, Florida Statutes, and Rule 9.190, Florida Rules of Appellate Procedure. Review proceedings must be instituted by filing a petition or notice of appeal with Julie Jones, the DFS Agency Clerk. Filing with the Agency Clerk may be accomplished via U.S. Mail, express overnight delivery, hand delivery, facsimile transmission, or electronic mail. The address for overnight delivery or hand delivery is Julie Jones, DFS Agency Clerk, Department of Financial Services, 612 Larson Building, 200 East Gaines Street, Tallahassee, Florida, 32399-0390. The fax number is (850) 488-0697. The email address is Julie.Jones@myfloridacfo.com.

A copy of the petition or notice of appeal must also be filed with the appropriate district court of appeal within thirty (30) days of the rendition of this Order.

Copies Furnished To:

Charles Franklin Fistel
3123 McDonald Street
Miami, Florida 33133-4416

GREGORY THOMAS, DIRECTOR
Division of Agents and Agency Services
200 East Gaines Street
Tallahassee, Florida 32399

JAMES A. BOSSART, ESQUIRE
Division of Legal Services
200 East Gaines Street
Tallahassee, Florida 32399



CHIEF FINANCIAL OFFICER
JEFF ATWATER
STATE OF FLORIDA

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IN THE MATTER OF:

CHARLES FRANKLIN FISTEL

CASE NO. 133591-14-AG

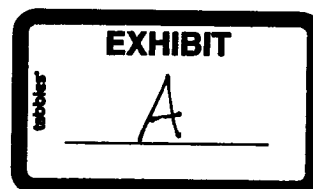
ADMINISTRATIVE COMPLAINT

TO: Charles Franklin Fistel
5690 SW 80TH Street
Coral Gables, Florida 33143

You, Charles Franklin Fistel, are hereby notified that pursuant to chapter 626, Florida Statutes, the Chief Financial Officer of the State of Florida has caused to be made an investigation of your activities while licensed as an insurance agent in this state, as a result of which it is alleged:

GENERAL ALLEGATIONS

1. You, Charles Franklin Fistel, are currently licensed in the state as a life, including variable annuity agent and a life insurance agent.
2. At all time pertinent to the dates and occurrences referred to in this Administrative Complaint you, Charles Franklin Fistel, were licensed as an insurance agent in this state.
3. Stranger-owned life insurance (SOLI) is generally described as a life insurance policy which is to be sold for profit to a third party who lacks any insurable interest in the life of the insured.



COUNT I

4. Paragraphs one through three are realleged and incorporated herein by reference.

5. On or about June 11, 2008, Richard Stephen Davey, an unlicensed individual, did personally recruit E.Y. of Pembroke Pines, Florida as a straw buyer to enter into a contract for life insurance on E.Y.'s life to be issued by Lincoln National Life Insurance (hereinafter "Lincoln").

6. Richard Stephen Davey told E.Y. that the policy premiums would be paid by a third party on E.Y.'s behalf and that the policy would be without cost to E.Y. for a period of two years. Mr. Davey also told E.Y. the policy at that point would be put up for sale. In return, E.Y. was to receive as compensation approximately \$300,000.00.

7. In furtherance of this scheme, you, Charles Franklin Fistel, procured, on or about June 11, 2008, a \$3,500,000.00 life insurance policy for E.Y. to be issued by Lincoln. You, Charles Franklin Fistel, signed as agent of record on this policy application.

8. A business entity known as WealthModes L.L.C. set up an irrevocable insurance trust on behalf of E.Y. for the purpose of making E.Y.'s life insurance premium payments. The trust was set up to be the owner and beneficiary of the policy, with the insurance policy as the sole trust asset. The purpose of this trust was to conceal from Lincoln the identity of the payer of the policy premiums and the fact that the insurance policy was to be sold or otherwise assigned to a third party. The trust document was later amended to include the Bank of Utah as the "independent professional trustee" of the trust.

9. On August 25, 2008, WealthModes, through another wholly-owned entity known as Simba Life L.L.C., advanced to E.Y. the sum of \$27,387.00. E.Y. then wrote a personal

check to Lincoln in that same amount as payment of the initial premium of the policy and mailed it to Simba Life L.L.C. This was the only premium payment made by E.Y. on the insurance policy.

10. You, Charles Franklin Fistel, obtained possession of the premium check written by E.Y. from Simba and remitted the premium check to Lincoln under your own letterhead and signature.

11. Lincoln does not to accept insurance applications for life insurance sold through life settlement contracts or SOLI programs that are to be sold or whose premiums are being paid by third parties. You, Charles Franklin Fistel, knew or should have known of this policy.

12. The Lincoln application signed by you, Charles Franklin Fistel, inquires in questions #22 and #35, "Will you, the proposed insured and/or beneficiary, and/or any entity on your behalf, receive any compensation, whether in the form of cash, property, an agreement to pay money in the future, a percentage of the death benefit, or otherwise, if this policy is issued?"

The questions were answered "NO." This response is false and a material misstatement of fact. You, Charles Franklin Fistel, were aware at all times that this was a false statement.

13. The Lincoln application signed by you, Charles Franklin Fistel, inquires in questions #23 and #36, "Have you been involved in any discussion about the possible sale or assignment of this policy or a beneficial interest in a trust, LLC, or other entity created or to be created on your behalf?" The questions were answered "NO." This response is false and a material misstatement of fact. You, Charles Franklin Fistel, were fully aware at all times that this was a false statement.

14. The Lincoln application signed by you, Charles Franklin Fistel, inquires in question #24, "Have you, the proposed insured, ever sold a policy to a life settlement, viatical, or other secondary market provider, or are you in the process of selling a policy?" This question was answered "NO." This response is false and a material misstatement of fact. You, Charles Franklin Fistel, were fully aware at all times that this was a false statement.

15. The Lincoln application signed by you, Charles Franklin Fistel, inquires in questions #25 and #37 "Is this policy being funded via a premium financing loan or with funds borrowed, advanced, or paid from another person or entity?" The questions were answered "NO." This response was false and a material misstatement of fact. You, Charles Franklin Fistel, were fully aware at all times that this was a false statement.

16. The Lincoln application signatory section contains the certification made by you, Charles Franklin Fistel, that "to the best of [your] knowledge, the source of funding for this policy does not include: (1) a non-recourse premium financing loan; or (2) any arrangement, other than a premium financing loan, which involves any person or entity with an interest in the potential for earnings based on the provision of funding for the policy." This representation is false and a material misstatement of fact. You, Charles Franklin Fistel, were fully aware at all times that this was a false statement.

17. The Lincoln application signatory section contains the certification made by you, Charles Franklin Fistel, that you "have not been involved in any recommendation regarding the possible sale or assignment of the policy to a life settlement, viatical or other secondary market provider." This representation is false and a material misstatement of fact. You, Charles Franklin Fistel, were fully aware at all times that this was a false statement.

18. The Lincoln application signatory section contains the certification made by you, Charles Franklin Fistel, that you asked the proposed insured each question on the application and that each question was answered accurately. This representation is false and a material misstatement of fact. You, Charles Franklin Fistel, were fully aware that this was a false statement as you at no time had ever met with E.Y. nor had you discussed the policy application with E.Y. in any fashion.

19. You, Charles Franklin Fistel, completed and signed a document entitled "REQUIRED PRODUCER AND REPRESENTATIVE CERTIFICATION REGARDING STRANGER OWNED LIFE INSURANCE" as part of the application process. You, Charles Franklin Fistel, expressly represented to Lincoln that: (1) the insured/owner/applicant would not receive any compensation as a result of the issuance of the policy; and (2) that no premium financing was contemplated to pay for future policy premiums; and (3) that you, Charles Franklin Fistel, were not aware of any relationship between the trustee and any premium financing company, life settlement, viatical or any other secondary market provider. These representations made by you, Charles Franklin Fistel, to the insurer were false and material misstatements of fact relied upon by Lincoln when issuing the policy. You, Charles Franklin Fistel, were fully aware at all times that these were false statements.

20. You, Charles Franklin Fistel, either misrepresented, or knew that E.Y. misrepresented and overstated her financial assets on the application, as to a net worth in excess of \$4,000,000.00, when the true sum was significantly less. This representation was false and a material misstatement of fact. You, Charles Franklin Fistel, were fully aware at all times that this

was a false statement. As a result of this false statement, the insurer issued an insurance policy with a benefit value in excess of what it otherwise would have been.

21. Section 627.404(5), Florida Statutes, provides that a trustee of a trust, acting in a fiduciary capacity, has an insurable interest in the insurance policy only so long as the life insurance proceeds are primarily used for the benefit of trust beneficiaries having an insurable interest in the life of the insured. The E.Y. Irrevocable Trust was not set up at the time the contract was made with the purpose of benefiting any trust beneficiaries who had an insurable interest in the life of E.Y.; but to only facilitate the later sale and assignment of the policy to a third party lacking any insurable interest.

22. The policy was duly issued. After the issuance of the policy, the policy premiums were regularly paid to Lincoln, not by E.Y., but by the trustee of the E.Y. Irrevocable Insurance Trust in the form of a wire transfer from the Bank of Utah.

23. On or about May 11, 2011, Lincoln received a demand for assignment to change the ownership of the policy from the trust to a third party, the Bank of Utah, pursuant to the terms of the restated trust document, all without the knowledge or informed consent of E.Y. or any of the trust beneficiaries.

24. The change of policy owner from E.Y. to the Bank of Utah was executed by the trustee, without E.Y.'s knowledge or informed consent, and was done in contravention of section 627.404, Florida Statutes, as neither the Bank of Utah nor any other third party has an insurable interest in the life of E.Y.

IT IS THEREFORE CHARGED that you, Charles Franklin Fistel, have violated or are accountable under provisions of one or more of the following provisions of the Florida Insurance

Code or the Florida Administrative Code, which constitute grounds for the suspension or revocation of your licenses as a Florida insurance agent:

(a) Section 626.611(5), Florida Statutes, which provides that it is a violation to willfully misrepresent any insurance policy or or to willfully deceive with regard to such policy, done either in person or by any form of dissemination of information or advertising;

(b) Section 626.611(7), Florida Statutes, which provides that it is a violation to demonstrate a lack of fitness or trustworthiness to engage in the business of insurance;

(c) Section 626.611(9), Florida Statutes, which provides that it is a violation to commit fraudulent or dishonest practices in transactions under the license;

(d) Section 626.611(13), Florida Statutes, which provides that it is a violation to willfully fail to comply with or willfully violate any provision of the Insurance Code;

(e) Section 626.621(6), Florida Statutes, which provides that it is a violation, in the conduct of business under the license or appointment, to engage in unfair methods of competition or in unfair or deceptive acts or practices, as prohibited under part IX of this chapter;

(f) Section 626.9541(1)(a)1, Florida Statutes, which provides that it is a violation to knowingly make, issue, circulate, or cause to be made, issued, or circulated, any estimate, illustration, circular, statement, sales presentation, omission, or comparison which misrepresents the benefits, advantages, conditions, or terms of any insurance policy;

(g) Section 626.9541(1)(e) 1, Florida Statutes, which provides that it is a violation to knowingly:

- a. File with any supervisory or other public official,
- b. Make, publish, disseminate, circulate,

c. Deliver to any person,

d. Place before the public,

e. Cause, directly or indirectly, to be made, published, disseminated,

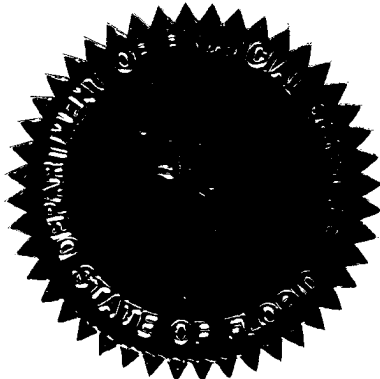
circulated, delivered to any person, or placed before the public, any false material statement;


(h) Section 626.9541(1)(k), Florida Statutes, which provides that it is a violation to knowingly make a false or fraudulent written or oral statement or representation on, or relative to, an application or negotiation for an insurance policy for the purpose of obtaining a fee, commission, money, or other benefit from an insurer, agent, broker or individual.

(i) Section 627.404, Florida Statutes, which provides that no person shall procure or cause to be procured or effected an insurance contract on the life or body of another individual unless the benefits under such contract are payable to the individual insured or his or her personal representatives, or to any person having, at the time such contract was made, an insurable interest in the life of the insured.

WHEREFORE, you, Charles Franklin Fistel, are hereby notified that the Chief Financial Officer intends to enter an Order suspending or revoking your licenses and appointments as an insurance agent or to impose such penalties as may be provided under the provisions of Sections 626.611, 626.621, 626.681, 626.691, and 626.9521, Florida Statutes, and under the other referenced Sections of the Florida Statutes as set out in this Administrative Complaint.

DATED and SIGNED this 11th day of August, 2014.




Gregory Thomas, Director
Division of Agent and Agency

NOTICE OF RIGHTS

You have the right to request a proceeding to contest this action by the Department of Financial Services ("Department") pursuant to Sections 120.569 and 120.57, Florida Statutes, and Rule 28-106, Florida Administrative Code. The proceeding request must be in writing, signed by you, and must be filed with the Department within twenty-one (21) days of your receipt of this notice. Completion of the attached Election of Proceeding form and/or a petition for administrative hearing will suffice as a written request. The request must be filed with the Julie Jones, DFS Agency Clerk, at the Florida Department of Financial Services, 612 Larson Building, 200 East Gaines Street, Tallahassee, Florida 32399-0390. Your written response must be received by the Department no later than 5:00 p.m. on the twenty-first day after your receipt of this notice. Mailing the response on the twenty-first day will not preserve your right to a hearing.

FAILURE TO ENSURE YOUR WRITTEN RESPONSE IS RECEIVED BY THE DEPARTMENT WITHIN TWENTY-ONE (21) DAYS OF YOUR RECEIPT OF THIS NOTICE WILL CONSTITUTE A WAIVER OF YOUR RIGHT TO REQUEST A PROCEEDING ON THE MATTERS ALLEGED HEREIN AND AN ORDER OF SUSPENSION OR REVOCATION WILL BE ENTERED AGAINST YOU.

If you request a proceeding, you must provide information that complies with the requirements of Rule 28-106.2015, Florida Administrative Code. As noted above, completion of the attached Election of Proceeding form conforms to these requirements. Specifically, your response must contain:

(a) The name, address, and telephone number, and facsimile number (if any) of the respondent (for the purpose of requesting a hearing in this matter, you are the "respondent").

(b) The name, address, telephone number, facsimile number of the attorney or qualified representative of the respondent (if any) upon whom service of pleadings and other papers shall be made.

(c) A statement requesting an administrative hearing identifying those material facts that are in dispute. If there are none, the petition must so indicate.

(d) A statement of when the respondent received notice of the administrative complaint.

(e) A statement including the file number to the administrative complaint.

If a hearing of any type is requested, you have the right to be represented by counsel or other qualified representative at your expense, to present evidence and argument, to call and cross-examine witnesses, and to compel the attendance of witnesses and the production of documents by subpoena.

If a proceeding is requested and there is no dispute of material fact, the provisions of Section 120.57(2), Florida Statutes, apply. In this regard, you may submit oral or written evidence in opposition to the action taken by the Department or a written statement challenging the grounds upon which the Department has relied. While a hearing is normally not required in the absence of a dispute of fact, if you feel that a hearing is necessary, one will be conducted in Tallahassee, Florida, or by telephonic conference call upon your request.

However, if you dispute material facts which are the basis for the Department's action, you must request an adversarial proceeding pursuant to Sections 120.569 and 120.57(1), Florida Statutes. These proceedings are held before a State Administrative Law Judge of the Division of Administrative Hearings. Unless the majority of witnesses are located elsewhere, the Department will request that the hearing be conducted in Tallahassee, Florida.

Failure to follow the procedure outlined with regard to your response to this notice may result in the request being denied. All prior oral communication or correspondence in this matter

shall be considered freeform agency action, and no such oral communication or correspondence shall operate as a valid request for an administrative proceeding. Any request for an administrative proceeding received prior to the date of this notice shall be deemed abandoned unless timely renewed in compliance with the guidelines as set out above.

Mediation of this matter pursuant to Section 120.573, Florida Statutes, is not available. No Department attorney will discuss this matter with you until the response has been received by the Department.

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a true and correct copy of the foregoing ADMINISTRATIVE COMPLAINT and ELECTION OF PROCEEDING has been furnished by U.S. Certified Mail to: to Charles Franklin Fistel, located at 5690 SW 80th Street, Coral Gables, FL 33143 on this 11th day of August, 2014.



JAMES A. BOSSART, ESQUIRE
Division of Legal Services
612 Larson Building
Tallahassee, Florida 32399-0333
(850) 413-4124

91 7199 9991 7032 7167 4573

STATE OF FLORIDA
DEPARTMENT OF FINANCIAL SERVICES
DIVISION OF LEGAL SERVICES

IN THE MATTER OF:

CHARLES FRANKLIN FISTEL

CASE NO. 133591-14-AG

ELECTION OF PROCEEDING

I have received and have read the Administrative Complaint filed by the Florida Department of Financial Services ("Department") against me, including the Notice of Rights contained therein, and I understand my options. I am requesting disposition of this matter as indicated below. **(CHOOSE ONE)**

1. ☐ I do not dispute any of the Department's factual allegations and I do not desire a hearing. I understand that by waiving my right to a hearing, the Department may enter a final order that adopts the Administrative Complaint and imposes the sanctions sought, including suspending or revoking my licenses and appointments as may be appropriate.
2. I do not dispute any of the Department's factual allegations and I hereby elect a proceeding to be conducted in accordance with Section 120.57(2), Florida Statutes. In this regard, I desire to **(CHOOSE ONE)**:
 - ☐ Submit a written statement and documentary evidence in lieu of a hearing; or
 - ☐ Personally attend a hearing conducted by a department hearing officer in Tallahassee; or
 - ☐ Attend that same hearing by way of a telephone conference call.
3. ☐ I do dispute one or more of the Department's factual allegations. I hereby request a hearing pursuant to Section 120.57(1), Florida Statutes, to be held before the Division of Administrative Hearings. I have attached to this election form the information required by Rule 28-106.2015, Florida Administrative Code, as specified in subparagraph (c) of the Notice of Rights. Specifically, I have identified the disputed issues of material fact.

TO PRESERVE YOUR RIGHT TO A HEARING, YOU MUST FILE YOUR RESPONSE WITH THE DEPARTMENT OF FINANCIAL SERVICES WITHIN TWENTY-ONE (21) DAYS OF YOUR RECEIPT OF THE ADMINISTRATIVE COMPLAINT. THE RESPONSE MUST BE RECEIVED BY THE DEPARTMENT NO LATER THAN 5:00 P.M. ON THE TWENTY-FIRST DAY AFTER YOUR RECEIPT OF THE ADMINISTRATIVE COMPLAINT.

The address for filing is: Julie Jones, DFS Agency Clerk, Florida Department of Financial Services, 612 Larson Building, 200 East Gaines Street, Tallahassee, Florida 32399-0390.

Signature _____

Print Name _____

Date: _____

Address: _____

Date Administrative
Complaint Received: _____

If you are represented by an attorney or qualified representative, please attach to this election form his or her name, address, telephone and fax numbers

Phone No.: _____

Fax No.: _____

AFFIDAVIT OF SERVICE

Administrative Complaint, Notice of Rights, Election of Proceeding (blank form)

Case Number: 133591-14-AG

In The Matter Of:
Charles Franklin Fistel

For: James A. Bossart
Division of Legal Services

Received by NOLAN PROCESS SERVERS, LLC on the 6th day of November, 2014 at 9:19 am to be served on **Charles Franklin Fistel, 999 Brickell Avenue, Ste 800, Miami, FL 37131**. I, Rodolfo Perez, being duly sworn, depose and say that on the 12 day of November, 2014 at 2:50 p.m., executed service by delivering a true copy of the **Administrative Complaint, Notice of Rights, Election of Proceeding (blank form)** in accordance with state statutes in the manner marked below:

☒ INDIVIDUAL SERVICE: Served the within-named person.

☐ SUBSTITUTE SERVICE: By delivering a true copy of the above writs to _____ as _____ Person receiving documents is at least 15 years of age and has been informed of the general nature of the documents.

☐ POSTED SERVICE: After attempting service on ___/___ at ___ and on ___/___ at ___ to a conspicuous place on the property described herein.

☐ NON SERVICE: For the reason detailed in the Comments below.

Military Status: ☐ Yes or ☒ No If yes, what branch? _____

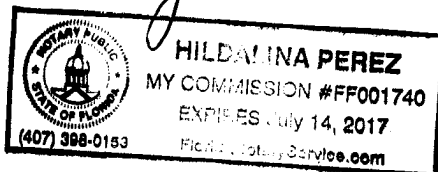
Marital Status: ☐ Married or ☒ Single Name of Spouse _____

COMMENTS: 1st address: Suite 800 is vacant. Per security guard Allied Medical used to occupy this suite, but they moved out last month. Served at 3123 McDonald Street, Miami FL
Age 54 Sex ☒ F Race W Height 5'9 Weight 200lb Hair Brownish Glasses Y Blue eyes
Gray Balding

I certify that I am over the age of 18, have no interest in the above action, and am a Certified Process Server, in good standing, in the judicial circuit in which the process was served. Under penalty of perjury I declare that the facts contained herein are true to the best of my knowledge. NO NOTARY REQUIRED PURSUANT TO F.S. 92.252(2).

Subscribed and Sworn to before me on the 13th day of Nov, 2014 by the affiant who is personally known to me.

Hilary
NOTARY PUBLIC



Rodolfo Perez
PROCESS SERVER # 360
Appointed in accordance with State Statutes

NOLAN PROCESS SERVERS, LLC
7498 Anglenwood Lane
Tallahassee, FL 32309
(850) 562-6058

Our Job Serial Number: 2014008299

EXHIBIT

B