



Illinois Department of Insurance

PAT QUINN
Governor

ANDREW BORON
Director

October 15, 2013

Sent via USPS certified mail
*return receipt requested

Scott Martin
President
Pekin Life Insurance Company
2505 Court Street
Pekin, IL61558-0001

Re: Pekin Life Insurance Market Conduct Examination, NAIC #67628

Dear Mr. Martin:

A Market Conduct Examination of your company was conducted by authorized examiners designated by the Director of Insurance pursuant to Illinois Insurance Code Sections 132, 401, 402, 403 and 425 of the Illinois Insurance Code. The Market Conduct Examination covered the period of January 1, 2012 through December 31, 2012.

As required by the Illinois insurance Code Section 132, the Director must notify the company made the subject of any market conduct examination of the contents of the verified examination report before filing it and making the report public of any matters relating thereto, and must afford the company an opportunity to demand a hearing with reference to the facts and other evidence therein contained.

A copy of the Market Conduct Examination Report is enclosed with this letter as well as a Stipulation and Consent Order. The Company may request a hearing within 10 days after receipt of the Market Conduct Examination Report by giving the Director written notice of the request, together with a statement of its objections. The Market Conduct Examination Report will generally not be filed until a hearing is completed.

Companies that do not demand a formal hearing may submit their rebuttal with respect to any matters in the Market Conduct Examination Report. The rebuttal will be considered by the Director before the Market Conduct Examination Report is filed. Please provide any rebuttals, or the signed Stipulation and Consent Orders, to the undersigned by close of business on October 31, 2013. In the event that the Company elects to sign the Stipulation and Consent Order, please

122 S. Michigan Ave., 19th Floor
Chicago, Illinois 60603
(312) 814-2420
<http://insurance.illinois.gov>

sign and return both copies. The Director will sign both copies and a fully executed copy will be returned to you for your records. Please note that the Stipulation and Consent Order requires proof of compliance with Orders 1 and 2 and payment of a civil forfeiture in the amount of \$50,000 within 30 days of receipt of the fully executed Stipulation and Consent Order.

Once the report of the Market Conduct Examination has been filed, the Market Conduct Examination Report, the company's rebuttal, if any, and corresponding Orders (if applicable) are public documents under the Freedom of Information Act (5 ILCS 140/1 *et al.*) and may be posted on the Department's website. In the event of a formal hearing, the record of the hearing, the Hearing Officer Recommendations and the Director's Final Order are also public documents and may be posted on the Department's website.

Please contact me if you have any questions. I may be reached at (312) 814-0919.

Sincerely,



Barbara Delano
Assistant General Counsel
Illinois Department of Insurance
Barbara.Delano@illinois.gov

122 S. Michigan Ave., 19th Floor
Chicago, Illinois 60603
(312) 814-2420
<http://insurance.illinois.gov>

This Market Conduct Examination was conducted pursuant to Sections 5/132, 5/401, 5/402, 5/403 and 5/425 of the Illinois Insurance Code (215 ILCS 5/132, 5/401, 5/402, 5/403 and 5/425). It was conducted in accordance with standard procedures of the Market Conduct Examination Section by duly qualified examiners of the Illinois Department of Insurance.

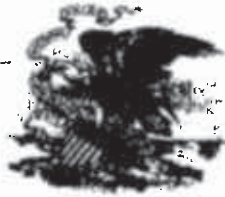
This report is divided into eight parts. They are as follows: Executive Summary, Scope of Examination, Background, Methodology, Selection of Sample, Findings and Technical Appendices 1A and 2A. All files reviewed were reviewed on the basis of the files' contents at the time of the examination. Unless otherwise noted, all overcharges (underwriting) and/or underpayments (claims) were reimbursed during the course of the examination.

No company, corporation, or individual shall use this report or any statement, excerpt, portion, or section thereof for any advertising, marketing or solicitation purpose. Any company, corporation or individual action contrary to the above shall be deemed a violation of Section 149 of the Illinois Insurance Code (215 ILCS 5/149).

The Examiner-in-Charge was responsible for the conduct of this examination. The Examiner-in-Charge did approve of each criticism contained herein and has sworn to the accuracy of this report.

Barbara Delano
Assistant General Counsel
Illinois Department of Insurance
Barbara.Delano@illinois.gov

STATE OF ILLINOIS
DEPARTMENT OF INSURANCE



IN THE MATTER OF THE EXAMINATION OF

PEKIN LIFE INSURANCE COMPANY
2505 COURT STREET
PEKIN, IL 61558-0001

MARKET CONDUCT EXAMINATION WARRANT

I, the undersigned, Director of Insurance of the State of Illinois, pursuant to Sections 132, 401, 402, 403 and 425 of the Illinois Insurance Code (215 ILCS 5/132, 5/401, 5/402 and 5/425) do hereby appoint Bernie Sullivan, of the Illinois Department of Insurance, as Examiner-In-Charge, and Andrew R. Greene, Iain D. Johnston, Philip Ackerman, Erika Kruse, Gabriela D'Adamo, and Rachael Blackburn, each of Johnston Greene LLC, as Examiners, to examine the insurance business and affairs of Pekin Life Insurance Company, NAIC # 67628, and to make a full and true report to me of the examination made by them of Pekin Life Insurance Company, with a full statement of the condition and operation of the business and affairs of Pekin Life Insurance Company, with any other information as shall in their opinion be requisite to furnish me a statement of the condition and operation of its business and affairs and the manner in which it conducts its business. This will be a specific targeted exam on the credit business of the company and will involve determining whether the company is paying commissions to unlicensed individuals. The costs of this examination shall be borne by the company.

The persons so appointed shall also have the power to administer oaths and to examine any person concerning the business, conduct, or affairs of Pekin Life Insurance Company. This warrant supersedes the warrant dated December 26, 2012 that was previously issued by the Illinois Department of Insurance for Pekin Life Insurance Company.



IN TESTIMONY WHEREOF, I hereto set my hand and cause to be affixed this Seal.

Done at the City of Chicago, this 24th day of January 2013.



Andrew Boron

Director

PEKIN LIFE INSURANCE COMPANY

MARKET CONDUCT EXAMINATION REPORT

DATE OF EXAMINATION: January 3, 2013 through June 1, 2013

EXAMINATION OF: Pekin Life Insurance Company, NAIC # 67628

COMPANY ADDRESS: 2505 Court Street
Pekin, IL 61558

PERIOD COVERED
BY EXAMINATION: January 1, 2012 through December 31, 2012

EXAMINER: Andrew Greene
Rachael Blackburn
Bernie Sullivan Jr. LUTCF
Examiner-in-Charge

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I: EXECUTIVE SUMMARY

The material findings, comments, violations and recommendations contained in this report are summarized below.

1. The Company was criticized under 215 ILCS 5/500-70(a)(12) for knowingly accepting insurance business from an individual who is not licensed.
2. The Company was criticized under 215 ILCS 5/500-80 and Department Company Bulletin 2009-04 for paying commissions to producers/entities who were not duly licensed under the laws of the State of Illinois.

II: SCOPE OF EXAMINATION

This examination comprised of a review of credit life insurance and credit health insurance business issued by the company and involved a determination of whether the company was paying commissions to unlicensed individuals or entities or allowing unlicensed individuals or entities to sell, solicit or negotiate insurance. The examiners utilized the interpretation of the applicable statutes set forth in Department Company Bulletin 2009-04, "Producer Licensing Requirements Regarding Group Credit Insurance."

The period of time covered by the examination was from January 1, 2012 through December 31, 2012 and was limited to Illinois business only. The examination was conducted pursuant to Illinois Department of Insurance policies and procedures and the National Association of Insurance Commissioners' Market Regulation Handbook. This report on the examination is confined to comments on those matters which involve departure from laws, regulations or rules, or which require explanation or description.

III: BACKGROUND

Pekin Life is 76% owned by the combination of The Farmers Automobile Insurance Association and that company's wholly owned subsidiary, Pekin Insurance Company, with the balance owned by Pekin Insurance directors, employees, independent agents, and the public with no one owning more than 1% of the outstanding stock. Pekin Life represents approximately one-quarter of the organization's capital and surplus. In 1985, the company formed Pekin Financial Life Insurance Company, a 100% owned credit insurance company domiciled in Arizona, which is currently inactive.

Pekin Life relies on and benefits from the strong relationships which exist between its independent agents and its parent, The Farmers Automobile Insurance Association. In the majority of its contracted agencies, Pekin Life is either the largest or second largest producer for these outlets. The company offers a well-diversified product portfolio through various sources of distribution. Term life, interest-sensitive whole life, universal life, group major medical, Medicare supplement, and annuity products are sold primarily through independent multi-line agents, the company's primary source of business. In addition, annuities, credit life and disability, and mortgage policies are available through financial institutions. In addition to financial institutions, Pekin Life also offers a modest amount of credit insurance through automobile dealerships. Its multiple product offerings allow more efficient lines of business to offset weaker performing lines in any given year. The company's primary market for these products is small towns in Illinois, Indiana, Iowa, Ohio and Wisconsin with the majority of net premium written originating in Illinois.

The limited geographic scope of its operations enables the company to cultivate long-term relationships with its agents many of whom have been contracted with Pekin Life for more than twenty years. This concentration, however, also exposes the company to declines in the population growth of small towns, which has historically been the company's target market. In an effort to expand geographically, Pekin Life has been contracting with more agencies in Illinois, Indiana, Iowa, and Wisconsin, and in recent years, has focused more on the suburbs outside of metropolitan areas. The company has also expanded its agency appointment program in Illinois in consideration of recent changes in population trends. The company began appointing agencies in the state of Ohio in 2006 and in Arizona in 2011. The company currently has relationships with approximately 1,230 independent agencies, 494 funeral homes and 850 financial service accounts, with a total licensed sales force of approximately 7,350.

NAIC's 2012 NAIC Annual Statement Page 24 (Illinois) reflects the following: NAIC #67628

	<u>Line</u>	<u>Direct premium written</u>	<u>Direct premium earned</u>	<u>Direct losses paid</u>	<u>Direct losses incurred</u>
24.2	Credit (group and individual)	\$2,171,802	\$2,123,488	\$840,100	\$773,559

IV: METHODOLOGY

The Market Conduct Examination places emphasis on an insurer's systems and procedures used in dealing with insureds and claimants.

The following categories are the general areas examined:

- A. Producer Licensing
- B. Producer Commission Payments

The review of these categories is accomplished through examination of individual files Company records. Each of these categories is examined for compliance with Department of Insurance rules and regulations and applicable state laws.

The report concerns itself with improper practices performed with such frequency as to indicate general business practices. Individual criticisms are identified and communicated with the insurer, but not cited in the report if not indicative of a general trend, except to the extent that there were underpayments and/or overpayments.

The following method was used to obtain the required samples and to assure a methodical selection. Surveys were developed from Company generated Excel spreadsheets. Random statistical printout reports were generated by the examiners and presented to the Company for retrieval.

Producer Licensing

The Company was asked for and provided a list of all producers/agents submitting new business applications for any credit life or accident or health policies during the examination period. This list was then compared to the Department's licensing records to determine whether each Producer and Agent was licensed in the state of Illinois. Agreements between the Company and Producers were also reviewed.

Producer Commission Payments

The Company was asked for and provided a list of all commissions or fees paid to producers/agents for any credit life or accident or health policies during the examination period. This list was then compared to the Department's licensing records to determine whether each Producer and Agent was licensed in the state of Illinois. Agreements between the Company and Producers were also reviewed.

V: SELECTION OF SAMPLE

<u>Survey</u>	<u>Population</u>	<u># Reviewed</u>	<u>% Reviewed</u>
Producer Review			
Producer Licensing	298	298	100.00%
Producer Commission Payments	298	298	100.00%

VI: FINDINGS

A. Producer Review

1. Producer Licensing

Two hundred eighty-six Producers/entities (95.97% of the 298 Producers/entities reviewed) failed to be duly licensed pursuant to 215 ILCS 5/500-15(a) of the Illinois Insurance Code. The Company has therefore, violated 215 ILCS 5/500-70(a)(12), for knowingly accepting insurance business from an individual/entity and for allowing agents/entities to sell, solicit, or negotiate insurance while not duly licensed under the laws of the State of Illinois. See Technical Appendices 1A. A class trend criticism was issued.

2. Producer Commission Payments

Commission payments, administration fees or marketing allowances payments amounting to \$1,734,769.16 were made to two hundred forty two producer/entities (81.20% of the 298 producer/entities reviewed) who were not duly licensed in violation of 215 ILCS 5/500-80 of the Illinois Insurance Code and as defined in Department of Insurance Bulletin #2009-4 dated May 29, 2009. Additionally, ten over-ride agents received \$11,561.67 in commissions while not being properly licensed. See Technical Appendices 2A. A class trend criticism was issued.

VIII: TECHNICAL APPENDICES 2A:

PRODUCER	CODE VIOLATED	CRITICISM	AMOUNT PAID
	215 ILCS 5/500.80	paying commissions to an individual for selling, soliciting or negotiating insurance business while unlicensed	\$20,731.70
	215 ILCS 5/500.80	paying commissions to an individual for selling, soliciting or negotiating insurance business while unlicensed	\$1,567.27
	215 ILCS 5/500.80	paying commissions to an individual for selling, soliciting or negotiating insurance business while unlicensed	\$5,685.04
	215 ILCS 5/500.80	paying commissions to an individual for selling, soliciting or negotiating insurance business while unlicensed	\$4,660.78
	215 ILCS 5/500.80	paying commissions to an individual for selling, soliciting or negotiating insurance business while unlicensed	\$3,121.18
	215 ILCS 5/500.80	paying commissions to an individual for selling, soliciting or negotiating insurance business while unlicensed	\$-483.84
	215 ILCS 5/500.80	paying commissions to an individual for selling, soliciting or negotiating insurance business while unlicensed	\$34,127.84
	215 ILCS 5/500.80	paying commissions to an individual for selling, soliciting or negotiating insurance business while unlicensed	\$707.91
	215 ILCS 5/500.80	paying commissions to an individual for selling, soliciting or negotiating insurance business while unlicensed	\$2,523.21
	215 ILCS 5/500.80	paying commissions to an individual for selling, soliciting or negotiating insurance business while unlicensed	\$5,561.51
	215 ILCS 5/500.80	paying commissions to an individual for selling, soliciting or negotiating insurance business while unlicensed	\$713.16
	215 ILCS 5/500.80	paying commissions to an individual for selling, soliciting or negotiating insurance business while unlicensed	\$464.67
	215 ILCS 5/500.80	paying commissions to an individual for selling, soliciting or negotiating insurance business while unlicensed	\$1,493.24
	215 ILCS 5/500.80	paying commissions to an individual for selling, soliciting or negotiating insurance business while unlicensed	\$5,593.34
	215 ILCS 5/500.80	paying commissions to an individual for selling, soliciting or negotiating insurance business while unlicensed	\$-2.42

	215 ILCS 5/500.80	paying commissions to an individual for selling, soliciting or negotiating insurance business while unlicensed	\$25,676.10
	215 ILCS 5/500.80	paying commissions to an individual for selling, soliciting or negotiating insurance business while unlicensed	\$4,167.67
	215 ILCS 5/500.80	paying commissions to an individual for selling, soliciting or negotiating insurance business while unlicensed	\$33,360.83
	215 ILCS 5/500.80	paying commissions to an individual for selling, soliciting or negotiating insurance business while unlicensed	\$5,199.14
	215 ILCS 5/500.80	paying commissions to an individual for selling, soliciting or negotiating insurance business while unlicensed	\$70.09
	215 ILCS 5/500.80	paying commissions to an individual for selling, soliciting or negotiating insurance business while unlicensed	\$10,973.86
	215 ILCS 5/500.80	paying commissions to an individual for selling, soliciting or negotiating insurance business while unlicensed	\$18,775.57
	215 ILCS 5/500.80	paying commissions to an individual for selling, soliciting or negotiating insurance business while unlicensed	\$7,158.90
	215 ILCS 5/500.80	paying commissions to an individual for selling, soliciting or negotiating insurance business while unlicensed	\$480.02
	215 ILCS 5/500.80	paying commissions to an individual for selling, soliciting or negotiating insurance business while unlicensed	\$3,786.62
	215 ILCS 5/500.80	paying commissions to an individual for selling, soliciting or negotiating insurance business while unlicensed	-\$65.54
	215 ILCS 5/500.80	paying commissions to an individual for selling, soliciting or negotiating insurance business while unlicensed	\$3,355.52
	215 ILCS 5/500.80	paying commissions to an individual for selling, soliciting or negotiating insurance business while unlicensed	\$267.50
	215 ILCS 5/500.80	paying commissions to an individual for selling, soliciting or negotiating insurance business while unlicensed	\$3,558.86
	215 ILCS 5/500.80	paying commissions to an individual for selling, soliciting or negotiating insurance business while unlicensed	\$1,419.24
	215 ILCS 5/500.80	paying commissions to an individual for selling, soliciting or negotiating insurance business while unlicensed	\$3,997.93
	215 ILCS 5/500.80	paying commissions to an individual for selling, soliciting or negotiating insurance business while unlicensed	\$603.88

		business while unlicensed	
	215 ILCS 5/500.80	paying commissions to an individual for selling, soliciting or negotiating insurance business while unlicensed	\$748.89
	215 ILCS 5/500.80	paying commissions to an individual for selling, soliciting or negotiating insurance business while unlicensed	\$2,459.03
	215 ILCS 5/500.80	paying commissions to an individual for selling, soliciting or negotiating insurance business while unlicensed	\$4,010.49
	215 ILCS 5/500.80	paying commissions to an individual for selling, soliciting or negotiating insurance business while unlicensed	\$-192.16
	215 ILCS 5/500.80	paying commissions to an individual for selling, soliciting or negotiating insurance business while unlicensed	\$2,204.06
	215 ILCS 5/500.80	paying commissions to an individual for selling, soliciting or negotiating insurance business while unlicensed	\$9,487.35
	215 ILCS 5/500.80	paying commissions to an individual for selling, soliciting or negotiating insurance business while unlicensed	\$1,533.51
	215 ILCS 5/500.80	paying commissions to an individual for selling, soliciting or negotiating insurance business while unlicensed	\$755.04
	215 ILCS 5/500.80	paying commissions to an individual for selling, soliciting or negotiating insurance business while unlicensed	\$1,333.06
	215 ILCS 5/500.80	paying commissions to an individual for selling, soliciting or negotiating insurance business while unlicensed	\$12,198.91
	215 ILCS 5/500.80	paying commissions to an individual for selling, soliciting or negotiating insurance business while unlicensed	\$-1.10
	215 ILCS 5/500.80	paying commissions to an individual for selling, soliciting or negotiating insurance business while unlicensed	\$44,661.79
	215 ILCS 5/500.80	paying commissions to an individual for selling, soliciting or negotiating insurance business while unlicensed	\$11,194.55
	215 ILCS 5/500.80	paying commissions to an individual for selling, soliciting or negotiating insurance business while unlicensed	\$2,909.78
	215 ILCS 5/500.80	paying commissions to an individual for selling, soliciting or negotiating insurance business while unlicensed	\$916.28
	215 ILCS 5/500.80	paying commissions to an individual for selling, soliciting or negotiating insurance business while unlicensed	\$500.02
	215 ILCS	paying commissions to an individual for	\$223.15

5/500.80	selling, soliciting or negotiating insurance business while unlicensed	
215 ILCS 5/500.80	paying commissions to an individual for selling, soliciting or negotiating insurance business while unlicensed	\$20,422.86
215 ILCS 5/500.80	paying commissions to an individual for selling, soliciting or negotiating insurance business while unlicensed	\$822.96
215 ILCS 5/500.80	paying commissions to an individual for selling, soliciting or negotiating insurance business while unlicensed	\$3,787.98
215 ILCS 5/500.80	paying commissions to an individual for selling, soliciting or negotiating insurance business while unlicensed	\$-91.88
215 ILCS 5/500.80	paying commissions to an individual for selling, soliciting or negotiating insurance business while unlicensed	\$593.07
215 ILCS 5/500.80	paying commissions to an individual for selling, soliciting or negotiating insurance business while unlicensed	\$358.21
215 ILCS 5/500.80	paying commissions to an individual for selling, soliciting or negotiating insurance business while unlicensed	\$1,362.21
215 ILCS 5/500.80	paying commissions to an individual for selling, soliciting or negotiating insurance business while unlicensed	\$1,786.20
215 ILCS 5/500.80	paying commissions to an individual for selling, soliciting or negotiating insurance business while unlicensed	\$5,937.98
215 ILCS 5/500.80	paying commissions to an individual for selling, soliciting or negotiating insurance business while unlicensed	\$311.78
215 ILCS 5/500.80	paying commissions to an individual for selling, soliciting or negotiating insurance business while unlicensed	\$1,112.43
215 ILCS 5/500.80	paying commissions to an individual for selling, soliciting or negotiating insurance business while unlicensed	\$3,220.32
215 ILCS 5/500.80	paying commissions to an individual for selling, soliciting or negotiating insurance business while unlicensed	\$274.76
215 ILCS 5/500.80	paying commissions to an individual for selling, soliciting or negotiating insurance business while unlicensed	\$4,758.83
215 ILCS 5/500.80	paying commissions to an individual for selling, soliciting or negotiating insurance business while unlicensed	\$1,779.56
215 ILCS 5/500.80	paying commissions to an individual for selling, soliciting or negotiating insurance business while unlicensed	\$332.74

	215 ILCS 5/500.80	paying commissions to an individual for selling, soliciting or negotiating insurance business while unlicensed	\$1,525.26
	215 ILCS 5/500.80	paying commissions to an individual for selling, soliciting or negotiating insurance business while unlicensed	\$3,138.39
	215 ILCS 5/500.80	paying commissions to an individual for selling, soliciting or negotiating insurance business while unlicensed	\$-59.52
	215 ILCS 5/500.80	paying commissions to an individual for selling, soliciting or negotiating insurance business while unlicensed	\$1,344.82
	215 ILCS 5/500.80	paying commissions to an individual for selling, soliciting or negotiating insurance business while unlicensed	\$777.50
	215 ILCS 5/500.80	paying commissions to an individual for selling, soliciting or negotiating insurance business while unlicensed	\$1,923.54
	215 ILCS 5/500.80	paying commissions to an individual for selling, soliciting or negotiating insurance business while unlicensed	\$1,930.78
	215 ILCS 5/500.80	paying commissions to an individual for selling, soliciting or negotiating insurance business while unlicensed	\$2,926.80
	215 ILCS 5/500.80	paying commissions to an individual for selling, soliciting or negotiating insurance business while unlicensed	\$2,273.40
	215 ILCS 5/500.80	paying commissions to an individual for selling, soliciting or negotiating insurance business while unlicensed	\$169.63
	215 ILCS 5/500.80	paying commissions to an individual for selling, soliciting or negotiating insurance business while unlicensed	\$537.19
	215 ILCS 5/500.80	paying commissions to an individual for selling, soliciting or negotiating insurance business while unlicensed	\$852.24
	215 ILCS 5/500.80	paying commissions to an individual for selling, soliciting or negotiating insurance business while unlicensed	\$1,698.86
	215 ILCS 5/500.80	paying commissions to an individual for selling, soliciting or negotiating insurance business while unlicensed	\$27,308.24
	215 ILCS 5/500.80	paying commissions to an individual for selling, soliciting or negotiating insurance business while unlicensed	\$-210.03
	215 ILCS 5/500.80	paying commissions to an individual for selling, soliciting or negotiating insurance business while unlicensed	\$3,218.10
	215 ILCS 5/500.80	paying commissions to an individual for selling, soliciting or negotiating insurance business while unlicensed	\$136,488.60

		business while unlicensed	
	215 ILCS 5/500.80	paying commissions to an individual for selling, soliciting or negotiating insurance business while unlicensed	\$61.50
	215 ILCS 5/500.80	paying commissions to an individual for selling, soliciting or negotiating insurance business while unlicensed	\$32,376.02
	215 ILCS 5/500.80	paying commissions to an individual for selling, soliciting or negotiating insurance business while unlicensed	\$17,442.13
	215 ILCS 5/500.80	paying commissions to an individual for selling, soliciting or negotiating insurance business while unlicensed	\$-1.22
	215 ILCS 5/500.80	paying commissions to an individual for selling, soliciting or negotiating insurance business while unlicensed	\$-322.32
	215 ILCS 5/500.80	paying commissions to an individual for selling, soliciting or negotiating insurance business while unlicensed	\$403.07
	215 ILCS 5/500.80	paying commissions to an individual for selling, soliciting or negotiating insurance business while unlicensed	\$707.58
	215 ILCS 5/500.80	paying commissions to an individual for selling, soliciting or negotiating insurance business while unlicensed	\$-295.20
	215 ILCS 5/500.80	paying commissions to an individual for selling, soliciting or negotiating insurance business while unlicensed	\$3,529.27
	215 ILCS 5/500.80	paying commissions to an individual for selling, soliciting or negotiating insurance business while unlicensed	\$-504.72
	215 ILCS 5/500.80	paying commissions to an individual for selling, soliciting or negotiating insurance business while unlicensed	\$324.65
	215 ILCS 5/500.80	paying commissions to an individual for selling, soliciting or negotiating insurance business while unlicensed	\$1,176.26
	215 ILCS 5/500.80	paying commissions to an individual for selling, soliciting or negotiating insurance business while unlicensed	\$857.43
	215 ILCS 5/500.80	paying commissions to an individual for selling, soliciting or negotiating insurance business while unlicensed	\$-56.48
	215 ILCS 5/500.80	paying commissions to an individual for selling, soliciting or negotiating insurance business while unlicensed	\$-1,083.08
	215 ILCS 5/500.80	paying commissions to an individual for selling, soliciting or negotiating insurance business while unlicensed	\$1,610.08
	215 ILCS	paying commissions to an individual for	\$-816.24

5/500.80	selling, soliciting or negotiating insurance business while unlicensed	
215 ILCS 5/500.80	paying commissions to an individual for selling, soliciting or negotiating insurance business while unlicensed	\$1,893.88
215 ILCS 5/500.80	paying commissions to an individual for selling, soliciting or negotiating insurance business while unlicensed	\$4,327.66
215 ILCS 5/500.80	paying commissions to an individual for selling, soliciting or negotiating insurance business while unlicensed	\$2,478.32
215 ILCS 5/500.80	paying commissions to an individual for selling, soliciting or negotiating insurance business while unlicensed	\$9,845.28
215 ILCS 5/500.80	paying commissions to an individual for selling, soliciting or negotiating insurance business while unlicensed	\$17,127.32
215 ILCS 5/500.80	paying commissions to an individual for selling, soliciting or negotiating insurance business while unlicensed	\$10,376.38
215 ILCS 5/500.80	paying commissions to an individual for selling, soliciting or negotiating insurance business while unlicensed	\$2,768.82
215 ILCS 5/500.80	paying commissions to an individual for selling, soliciting or negotiating insurance business while unlicensed	\$52,165.38
215 ILCS 5/500.80	paying commissions to an individual for selling, soliciting or negotiating insurance business while unlicensed	\$6,238.08
215 ILCS 5/500.80	paying commissions to an individual for selling, soliciting or negotiating insurance business while unlicensed	\$1,519.50
215 ILCS 5/500.80	paying commissions to an individual for selling, soliciting or negotiating insurance business while unlicensed	\$6,521.64
215 ILCS 5/500.80	paying commissions to an individual for selling, soliciting or negotiating insurance business while unlicensed	\$736.44
215 ILCS 5/500.80	paying commissions to an individual for selling, soliciting or negotiating insurance business while unlicensed	\$42,639.71
215 ILCS 5/500.80	paying commissions to an individual for selling, soliciting or negotiating insurance business while unlicensed	\$352.35
215 ILCS 5/500.80	paying commissions to an individual for selling, soliciting or negotiating insurance business while unlicensed	\$8,417.68
215 ILCS 5/500.80	paying commissions to an individual for selling, soliciting or negotiating insurance business while unlicensed	\$2,322.84

215 ILCS 5/500.80	paying commissions to an individual for selling, soliciting or negotiating insurance business while unlicensed	\$-162.13
215 ILCS 5/500.80	paying commissions to an individual for selling, soliciting or negotiating insurance business while unlicensed	\$6,410.28
215 ILCS 5/500.80	paying commissions to an individual for selling, soliciting or negotiating insurance business while unlicensed	\$1,091.84
215 ILCS 5/500.80	paying commissions to an individual for selling, soliciting or negotiating insurance business while unlicensed	\$770.19
215 ILCS 5/500.80	paying commissions to an individual for selling, soliciting or negotiating insurance business while unlicensed	\$1,636.85
215 ILCS 5/500.80	paying commissions to an individual for selling, soliciting or negotiating insurance business while unlicensed	\$6,333.04
215 ILCS 5/500.80	paying commissions to an individual for selling, soliciting or negotiating insurance business while unlicensed	\$-156.07
215 ILCS 5/500.80	paying commissions to an individual for selling, soliciting or negotiating insurance business while unlicensed	\$1,039.17
215 ILCS 5/500.80	paying commissions to an individual for selling, soliciting or negotiating insurance business while unlicensed	\$2,971.37
215 ILCS 5/500.80	paying commissions to an individual for selling, soliciting or negotiating insurance business while unlicensed	\$-133.92
215 ILCS 5/500.80	paying commissions to an individual for selling, soliciting or negotiating insurance business while unlicensed	\$24,044.08
215 ILCS 5/500.80	paying commissions to an individual for selling, soliciting or negotiating insurance business while unlicensed	\$29,423.21
215 ILCS 5/500.80	paying commissions to an individual for selling, soliciting or negotiating insurance business while unlicensed	\$26,294.36
215 ILCS 5/500.80	paying commissions to an individual for selling, soliciting or negotiating insurance business while unlicensed	\$204.97
215 ILCS 5/500.80	paying commissions to an individual for selling, soliciting or negotiating insurance business while unlicensed	\$3,515.38
215 ILCS 5/500.80	paying commissions to an individual for selling, soliciting or negotiating insurance business while unlicensed	\$1,710.91
215 ILCS 5/500.80	paying commissions to an individual for selling, soliciting or negotiating insurance business while unlicensed	\$1,443.17

		business while unlicensed	
	215 ILCS 5/500.80	paying commissions to an individual for selling, soliciting or negotiating insurance business while unlicensed	\$1,269.79
	215 ILCS 5/500.80	paying commissions to an individual for selling, soliciting or negotiating insurance business while unlicensed	\$1,294.24
	215 ILCS 5/500.80	paying commissions to an individual for selling, soliciting or negotiating insurance business while unlicensed	\$827.62
	215 ILCS 5/500.80	paying commissions to an individual for selling, soliciting or negotiating insurance business while unlicensed	\$16,298.57
	215 ILCS 5/500.80	paying commissions to an individual for selling, soliciting or negotiating insurance business while unlicensed	\$5,643.39
	215 ILCS 5/500.80	paying commissions to an individual for selling, soliciting or negotiating insurance business while unlicensed	\$2,550.36
	215 ILCS 5/500.80	paying commissions to an individual for selling, soliciting or negotiating insurance business while unlicensed	\$4,030.16
	215 ILCS 5/500.80	paying commissions to an individual for selling, soliciting or negotiating insurance business while unlicensed	\$7,583.28
	215 ILCS 5/500.80	paying commissions to an individual for selling, soliciting or negotiating insurance business while unlicensed	\$20,111.80
	215 ILCS 5/500.80	paying commissions to an individual for selling, soliciting or negotiating insurance business while unlicensed	\$4,928.96
	215 ILCS 5/500.80	paying commissions to an individual for selling, soliciting or negotiating insurance business while unlicensed	\$20,865.42
	215 ILCS 5/500.80	paying commissions to an individual for selling, soliciting or negotiating insurance business while unlicensed	\$1,409.76
	215 ILCS 5/500.80	paying commissions to an individual for selling, soliciting or negotiating insurance business while unlicensed	\$50,835.82
	215 ILCS 5/500.80	paying commissions to an individual for selling, soliciting or negotiating insurance business while unlicensed	\$220.40
	215 ILCS 5/500.80	paying commissions to an individual for selling, soliciting or negotiating insurance business while unlicensed	\$1,194.06
	215 ILCS 5/500.80	paying commissions to an individual for selling, soliciting or negotiating insurance business while unlicensed	\$4,842.72
	215 ILCS	paying commissions to an individual for	\$29,500.58

	5/500.80	selling, soliciting or negotiating insurance business while unlicensed	
	215 ILCS 5/500.80	paying commissions to an individual for selling, soliciting or negotiating insurance business while unlicensed	\$27,784.58
	215 ILCS 5/500.80	paying commissions to an individual for selling, soliciting or negotiating insurance business while unlicensed	\$1,357.23
	215 ILCS 5/500.80	paying commissions to an individual for selling, soliciting or negotiating insurance business while unlicensed	\$6,213.66
	215 ILCS 5/500.80	paying commissions to an individual for selling, soliciting or negotiating insurance business while unlicensed	\$1,096.93
	215 ILCS 5/500.80	paying commissions to an individual for selling, soliciting or negotiating insurance business while unlicensed	\$5,300.55
	215 ILCS 5/500.80	paying commissions to an individual for selling, soliciting or negotiating insurance business while unlicensed	\$917.93
	215 ILCS 5/500.80	paying commissions to an individual for selling, soliciting or negotiating insurance business while unlicensed	\$12,518.81
	215 ILCS 5/500.80	paying commissions to an individual for selling, soliciting or negotiating insurance business while unlicensed	\$1,723.28
	215 ILCS 5/500.80	paying commissions to an individual for selling, soliciting or negotiating insurance business while unlicensed	\$3,866.78
	215 ILCS 5/500.80	paying commissions to an individual for selling, soliciting or negotiating insurance business while unlicensed	\$8,970.95
	215 ILCS 5/500.80	paying commissions to an individual for selling, soliciting or negotiating insurance business while unlicensed	\$15,425.23
	215 ILCS 5/500.80	paying commissions to an individual for selling, soliciting or negotiating insurance business while unlicensed	\$6,745.84
	215 ILCS 5/500.80	paying commissions to an individual for selling, soliciting or negotiating insurance business while unlicensed	\$1,241.01
	215 ILCS 5/500.80	paying commissions to an individual for selling, soliciting or negotiating insurance business while unlicensed	\$15,592.35
	215 ILCS 5/500.80	paying commissions to an individual for selling, soliciting or negotiating insurance business while unlicensed	\$11,614.10
	215 ILCS 5/500.80	paying commissions to an individual for selling, soliciting or negotiating insurance business while unlicensed	\$1,106.94

215 ILCS 5/500.80	paying commissions to an individual for selling, soliciting or negotiating insurance business while unlicensed	\$3,035.91
215 ILCS 5/500.80	paying commissions to an individual for selling, soliciting or negotiating insurance business while unlicensed	\$1,189.53
215 ILCS 5/500.80	paying commissions to an individual for selling, soliciting or negotiating insurance business while unlicensed	\$1,171.29
215 ILCS 5/500.80	paying commissions to an individual for selling, soliciting or negotiating insurance business while unlicensed	\$18,572.59
215 ILCS 5/500.80	paying commissions to an individual for selling, soliciting or negotiating insurance business while unlicensed	\$10,538.30
215 ILCS 5/500.80	paying commissions to an individual for selling, soliciting or negotiating insurance business while unlicensed	\$3,875.38
215 ILCS 5/500.80	paying commissions to an individual for selling, soliciting or negotiating insurance business while unlicensed	\$4,596.62
215 ILCS 5/500.80	paying commissions to an individual for selling, soliciting or negotiating insurance business while unlicensed	\$6,124.29
215 ILCS 5/500.80	paying commissions to an individual for selling, soliciting or negotiating insurance business while unlicensed	\$-262.86
215 ILCS 5/500.80	paying commissions to an individual for selling, soliciting or negotiating insurance business while unlicensed	\$11,503.46
215 ILCS 5/500.80	paying commissions to an individual for selling, soliciting or negotiating insurance business while unlicensed	\$1,922.00
215 ILCS 5/500.80	paying commissions to an individual for selling, soliciting or negotiating insurance business while unlicensed	\$422.62
215 ILCS 5/500.80	paying commissions to an individual for selling, soliciting or negotiating insurance business while unlicensed	\$-20.08
215 ILCS 5/500.80	paying commissions to an individual for selling, soliciting or negotiating insurance business while unlicensed	\$5,221.43
215 ILCS 5/500.80	paying commissions to an individual for selling, soliciting or negotiating insurance business while unlicensed	\$19,144.75
215 ILCS 5/500.80	paying commissions to an individual for selling, soliciting or negotiating insurance business while unlicensed	\$18,365.49
215 ILCS 5/500.80	paying commissions to an individual for selling, soliciting or negotiating insurance business while unlicensed	\$1,919.40

		business while unlicensed	
	215 ILCS 5/500.80	paying commissions to an individual for selling, soliciting or negotiating insurance business while unlicensed	\$2,838.67
	215 ILCS 5/500.80	paying commissions to an individual for selling, soliciting or negotiating insurance business while unlicensed	\$4,388.99
	215 ILCS 5/500.80	paying commissions to an individual for selling, soliciting or negotiating insurance business while unlicensed	\$8,025.09
	215 ILCS 5/500.80	paying commissions to an individual for selling, soliciting or negotiating insurance business while unlicensed	\$6,203.87
	215 ILCS 5/500.80	paying commissions to an individual for selling, soliciting or negotiating insurance business while unlicensed	\$1,689.38
	215 ILCS 5/500.80	paying commissions to an individual for selling, soliciting or negotiating insurance business while unlicensed	\$27,212.71
	215 ILCS 5/500.80	paying commissions to an individual for selling, soliciting or negotiating insurance business while unlicensed	\$838.43
	215 ILCS 5/500.80	paying commissions to an individual for selling, soliciting or negotiating insurance business while unlicensed	\$-2.73
	215 ILCS 5/500.80	paying commissions to an individual for selling, soliciting or negotiating insurance business while unlicensed	\$991.09
	215 ILCS 5/500.80	paying commissions to an individual for selling, soliciting or negotiating insurance business while unlicensed	\$271.69
	215 ILCS 5/500.80	paying commissions to an individual for selling, soliciting or negotiating insurance business while unlicensed	\$4,588.97
	215 ILCS 5/500.80	paying commissions to an individual for selling, soliciting or negotiating insurance business while unlicensed	\$2,888.85
	215 ILCS 5/500.80	paying commissions to an individual for selling, soliciting or negotiating insurance business while unlicensed	\$6,951.08
	215 ILCS 5/500.80	paying commissions to an individual for selling, soliciting or negotiating insurance business while unlicensed	\$3,351.25
	215 ILCS 5/500.80	paying commissions to an individual for selling, soliciting or negotiating insurance business while unlicensed	\$7,567.01
	215 ILCS 5/500.80	paying commissions to an individual for selling, soliciting or negotiating insurance business while unlicensed	\$7,023.06
	215 ILCS	paying commissions to an individual for	\$-158.53

5/500.80	selling, soliciting or negotiating insurance business while unlicensed	
215 ILCS 5/500.80	paying commissions to an individual for selling, soliciting or negotiating insurance business while unlicensed	\$4,887.52
215 ILCS 5/500.80	paying commissions to an individual for selling, soliciting or negotiating insurance business while unlicensed	\$10,452.31
215 ILCS 5/500.80	paying commissions to an individual for selling, soliciting or negotiating insurance business while unlicensed	\$6,203.04
215 ILCS 5/500.80	paying commissions to an individual for selling, soliciting or negotiating insurance business while unlicensed	\$6,309.72
215 ILCS 5/500.80	paying commissions to an individual for selling, soliciting or negotiating insurance business while unlicensed	\$36.62
215 ILCS 5/500.80	paying commissions to an individual for selling, soliciting or negotiating insurance business while unlicensed	\$4,428.27
215 ILCS 5/500.80	paying commissions to an individual for selling, soliciting or negotiating insurance business while unlicensed	\$12,789.48
215 ILCS 5/500.80	paying commissions to an individual for selling, soliciting or negotiating insurance business while unlicensed	\$1,006.53
215 ILCS 5/500.80	paying commissions to an individual for selling, soliciting or negotiating insurance business while unlicensed	\$3,870.97
215 ILCS 5/500.80	paying commissions to an individual for selling, soliciting or negotiating insurance business while unlicensed	\$596.97
215 ILCS 5/500.80	paying commissions to an individual for selling, soliciting or negotiating insurance business while unlicensed	\$6.24
215 ILCS 5/500.80	paying commissions to an individual for selling, soliciting or negotiating insurance business while unlicensed	\$2,189.17
215 ILCS 5/500.80	paying commissions to an individual for selling, soliciting or negotiating insurance business while unlicensed	\$610.65
215 ILCS 5/500.80	paying commissions to an individual for selling, soliciting or negotiating insurance business while unlicensed	\$494.33
215 ILCS 5/500.80	paying commissions to an individual for selling, soliciting or negotiating insurance business while unlicensed	\$3,798.34
215 ILCS 5/500.80	paying commissions to an individual for selling, soliciting or negotiating insurance business while unlicensed	\$1,646.60

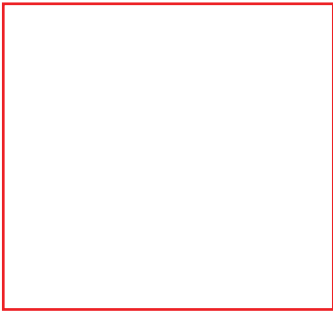
215 ILCS 5/500.80	paying commissions to an individual for selling, soliciting or negotiating insurance business while unlicensed	\$1,282.31
215 ILCS 5/500.80	paying commissions to an individual for selling, soliciting or negotiating insurance business while unlicensed	\$864.47
215 ILCS 5/500.80	paying commissions to an individual for selling, soliciting or negotiating insurance business while unlicensed	\$1,271.96
215 ILCS 5/500.80	paying commissions to an individual for selling, soliciting or negotiating insurance business while unlicensed	\$5,203.64
215 ILCS 5/500.80	paying commissions to an individual for selling, soliciting or negotiating insurance business while unlicensed	\$106,507.77
215 ILCS 5/500.80	paying commissions to an individual for selling, soliciting or negotiating insurance business while unlicensed	\$7,635.75
215 ILCS 5/500.80	paying commissions to an individual for selling, soliciting or negotiating insurance business while unlicensed	\$744.93
215 ILCS 5/500.80	paying commissions to an individual for selling, soliciting or negotiating insurance business while unlicensed	\$3,155.28
215 ILCS 5/500.80	paying commissions to an individual for selling, soliciting or negotiating insurance business while unlicensed	\$2,781.78
215 ILCS 5/500.80	paying commissions to an individual for selling, soliciting or negotiating insurance business while unlicensed	\$2,386.29
215 ILCS 5/500.80	paying commissions to an individual for selling, soliciting or negotiating insurance business while unlicensed	\$1,900.48
215 ILCS 5/500.80	paying commissions to an individual for selling, soliciting or negotiating insurance business while unlicensed	\$352.17
215 ILCS 5/500.80	paying commissions to an individual for selling, soliciting or negotiating insurance business while unlicensed	\$8,910.24
215 ILCS 5/500.80	paying commissions to an individual for selling, soliciting or negotiating insurance business while unlicensed	\$-192.48
215 ILCS 5/500.80	paying commissions to an individual for selling, soliciting or negotiating insurance business while unlicensed	\$-1,141.71
215 ILCS 5/500.80	paying commissions to an individual for selling, soliciting or negotiating insurance business while unlicensed	\$3,467.08
215 ILCS 5/500.80	paying commissions to an individual for selling, soliciting or negotiating insurance business while unlicensed	\$253.45

		business while unlicensed	
215 ILCS 5/500.80		paying commissions to an individual for selling, soliciting or negotiating insurance business while unlicensed	\$-828.13
215 ILCS 5/500.80		paying commissions to an individual for selling, soliciting or negotiating insurance business while unlicensed	\$-115.95
215 ILCS 5/500.80		paying commissions to an individual for selling, soliciting or negotiating insurance business while unlicensed	\$-110.69
215 ILCS 5/500.80		paying commissions to an individual for selling, soliciting or negotiating insurance business while unlicensed	\$22.27
215 ILCS 5/500.80		paying commissions to an individual for selling, soliciting or negotiating insurance business while unlicensed	\$1,702.77
215 ILCS 5/500.80		paying commissions to an individual for selling, soliciting or negotiating insurance business while unlicensed	\$744.34
215 ILCS 5/500.80		paying commissions to an individual for selling, soliciting or negotiating insurance business while unlicensed	\$-1.26
215 ILCS 5/500.80		paying commissions to an individual for selling, soliciting or negotiating insurance business while unlicensed	\$-76.56
215 ILCS 5/500.80		paying commissions to an individual for selling, soliciting or negotiating insurance business while unlicensed	\$236.13
215 ILCS 5/500.80		paying commissions to an individual for selling, soliciting or negotiating insurance business while unlicensed	\$-466.84
215 ILCS 5/500.80		paying commissions to an individual for selling, soliciting or negotiating insurance business while unlicensed	\$14,151.14
215 ILCS 5/500.80		paying commissions to an individual for selling, soliciting or negotiating insurance business while unlicensed	\$-12.57
215 ILCS 5/500.80		paying commissions to an individual for selling, soliciting or negotiating insurance business while unlicensed	\$283.64
215 ILCS 5/500.80		paying commissions to an individual for selling, soliciting or negotiating insurance business while unlicensed	\$-32.22
215 ILCS 5/500.80		paying commissions to an individual for selling, soliciting or negotiating insurance business while unlicensed	\$302.28
215 ILCS 5/500.80		paying commissions to an individual for selling, soliciting or negotiating insurance business while unlicensed	\$-11.06
215 ILCS		paying commissions to an individual for	\$-962.17

5/500.80	selling, soliciting or negotiating insurance business while unlicensed	
215 ILCS 5/500.80	paying commissions to an individual for selling, soliciting or negotiating insurance business while unlicensed	\$17,457.77
215 ILCS 5/500.80	paying commissions to an individual for selling, soliciting or negotiating insurance business while unlicensed	\$-26.29
215 ILCS 5/500.80	paying commissions to an individual for selling, soliciting or negotiating insurance business while unlicensed	\$-32.85
215 ILCS 5/500.80	paying commissions to an individual for selling, soliciting or negotiating insurance business while unlicensed	\$82.10
215 ILCS 5/500.80	paying commissions to an individual for selling, soliciting or negotiating insurance business while unlicensed	\$369.86
215 ILCS 5/500.80	paying commissions to an individual for selling, soliciting or negotiating insurance business while unlicensed	\$234.83
215 ILCS 5/500.80	paying commissions to an individual for selling, soliciting or negotiating insurance business while unlicensed	\$1,026.08
215 ILCS 5/500.80	paying commissions to an individual for selling, soliciting or negotiating insurance business while unlicensed	\$1,872.20
215 ILCS 5/500.80	paying commissions to an individual for selling, soliciting or negotiating insurance business while unlicensed	\$4,061.62
215 ILCS 5/500.80	paying commissions to an individual for selling, soliciting or negotiating insurance business while unlicensed	\$1,106.25
215 ILCS 5/500.80	paying commissions to an individual for selling, soliciting or negotiating insurance business while unlicensed	\$3,809.30
215 ILCS 5/500.80	paying commissions to an individual for selling, soliciting or negotiating insurance business while unlicensed	\$-361.88
215 ILCS 5/500.80	paying commissions to an individual for selling, soliciting or negotiating insurance business while unlicensed	\$-37.82
215 ILCS 5/500.80	paying commissions to an individual for selling, soliciting or negotiating insurance business while unlicensed	\$-326.12
215 ILCS 5/500.80	paying commissions to an individual for selling, soliciting or negotiating insurance business while unlicensed	\$-5.52
215 ILCS 5/500.80	paying commissions to an individual for selling, soliciting or negotiating insurance business while unlicensed	\$2,926.86

215 ILCS 5/500.80	paying commissions to an individual for selling, soliciting or negotiating insurance business while unlicensed	\$685.69
215 ILCS 5/500.80	paying commissions to an individual for selling, soliciting or negotiating insurance business while unlicensed	\$5,374.07
215 ILCS 5/500.80	paying commissions to an individual for selling, soliciting or negotiating insurance business while unlicensed	\$-231.02
215 ILCS 5/500.80	paying commissions to an individual for selling, soliciting or negotiating insurance business while unlicensed	\$1,131.20
215 ILCS 5/500.80	paying commissions to an individual for selling, soliciting or negotiating insurance business while unlicensed	\$19,543.54
215 ILCS 5/500.80	paying commissions to an individual for selling, soliciting or negotiating insurance business while unlicensed	\$8,690.87
215 ILCS 5/500.80	paying commissions to an individual for selling, soliciting or negotiating insurance business while unlicensed	\$18,584.24
215 ILCS 5/500.80	paying commissions to an individual for selling, soliciting or negotiating insurance business while unlicensed	\$6,834.04
215 ILCS 5/500.80	paying commissions to an individual for selling, soliciting or negotiating insurance business while unlicensed	\$7,236.63
215 ILCS 5/500.80	paying commissions to an individual for selling, soliciting or negotiating insurance business while unlicensed	\$689.55
215 ILCS 5/500.80	paying commissions to an individual for selling, soliciting or negotiating insurance business while unlicensed	\$1,137.30
215 ILCS 5/500.80	paying commissions to an individual for selling, soliciting or negotiating insurance business while unlicensed	\$5,548.54
215 ILCS 5/500.80	paying commissions to an individual for selling, soliciting or negotiating insurance business while unlicensed	\$1,705.79
215 ILCS 5/500.80	paying commissions to an individual for selling, soliciting or negotiating insurance business while unlicensed	\$9,121.86
215 ILCS 5/500.80	paying commissions to an individual for selling, soliciting or negotiating insurance business while unlicensed	\$9,519.68
215 ILCS 5/500.80	paying commissions to an individual for selling, soliciting or negotiating insurance business while unlicensed	\$1,201.16
215 ILCS 5/500.80	paying commissions to an individual for selling, soliciting or negotiating insurance business while unlicensed	\$995.90

		business while unlicensed	
	215 ILCS 5/500.80	paying commissions to an individual for selling, soliciting or negotiating insurance business while unlicensed	\$17,111.91
	215 ILCS 5/500.80	paying commissions to an individual for selling, soliciting or negotiating insurance business while unlicensed	\$8,483.27
	215 ILCS 5/500.80	paying commissions to an individual for selling, soliciting or negotiating insurance business while unlicensed	\$217.46
	215 ILCS 5/500.80	paying commissions to an individual for selling, soliciting or negotiating insurance business while unlicensed	\$2,166.80
	215 ILCS 5/500.80	paying commissions to an individual for selling, soliciting or negotiating insurance business while unlicensed	\$182.82
	215 ILCS 5/500.80	paying commissions to an individual for selling, soliciting or negotiating insurance business while unlicensed	\$446.93
	215 ILCS 5/500.80	paying commissions to an individual for selling, soliciting or negotiating insurance business while unlicensed	\$76.23
	215 ILCS 5/500.80	paying commissions to an individual for selling, soliciting or negotiating insurance business while unlicensed	\$937.16
	215 ILCS 5/500.80	paying commissions to an individual for selling, soliciting or negotiating insurance business while unlicensed	\$278.08
	215 ILCS 5/500.80	paying commissions to an individual for selling, soliciting or negotiating insurance business while unlicensed	\$1,566.12
	215 ILCS 5/500.80	paying commissions to an individual for selling, soliciting or negotiating insurance business while unlicensed	\$84.05
	215 ILCS 5/500.80	paying commissions to an individual for selling, soliciting or negotiating insurance business while unlicensed	\$126.30
	215 ILCS 5/500.80	paying commissions to an individual for selling, soliciting or negotiating insurance business while unlicensed	\$7,874.34
	215 ILCS 5/500.80	paying commissions to an individual for selling, soliciting or negotiating insurance business while unlicensed	\$57.73
	215 ILCS 5/500.80	paying commissions to an individual for selling, soliciting or negotiating insurance business while unlicensed	\$54.03
	215 ILCS 5/500.80	paying commissions to an individual for selling, soliciting or negotiating insurance business while unlicensed	\$1,414.35
	215 ILCS	paying commissions to an individual for	\$106.98



5/500.80	selling, soliciting or negotiating insurance business while unlicensed	
215 ILCS 5/500.80	paying commissions to an individual for selling, soliciting or negotiating insurance business while unlicensed	\$-31

STATE OF ILLINOIS)
) ss
COUNTY OF COOK)

Bernie Sullivan, being first duly sworn upon his oath, deposes and says:

That he was appointed by the Director of Insurance of the State of Illinois (the "Director") as Examiner-In Charge to examine the insurance business and affairs of:

Pekin Life Insurance Company Market Conduct Examination, NAIC #67628 (the "Company")

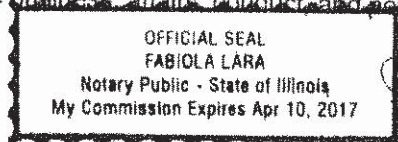
That, as Examiner-In-Charge, he was directed to make a full and true report to the Director of the examination with a full statement of the condition and operation of the business and affairs of the Company with any other information as shall in the opinion of the Examiner-In-Charge be requisite to furnish the Director with a statement of the condition and operation of the Company's business and affairs and the manner in which the Company conducts their business;

That neither he nor any other persons designated as examiners nor any members of their immediate families is an officer of, connected with, or financially interested in the Company nor any of the Company's affiliates other than as policyholders, and that neither he nor any other persons designated as examiners nor any members of their immediate families is financially interested in any other corporation or person affected by the examination;

That an examination was made of the affairs of the Company pursuant to the authority vested in the Examiner-In-Charge by the Director of Insurance of the State of Illinois;

That he was the Examiner-in-Charge of said examination and the attached report of examination is a full and true statement of the condition and operation of the insurance business and affairs of the Company for the period covered by the Report as determined by the examiners;

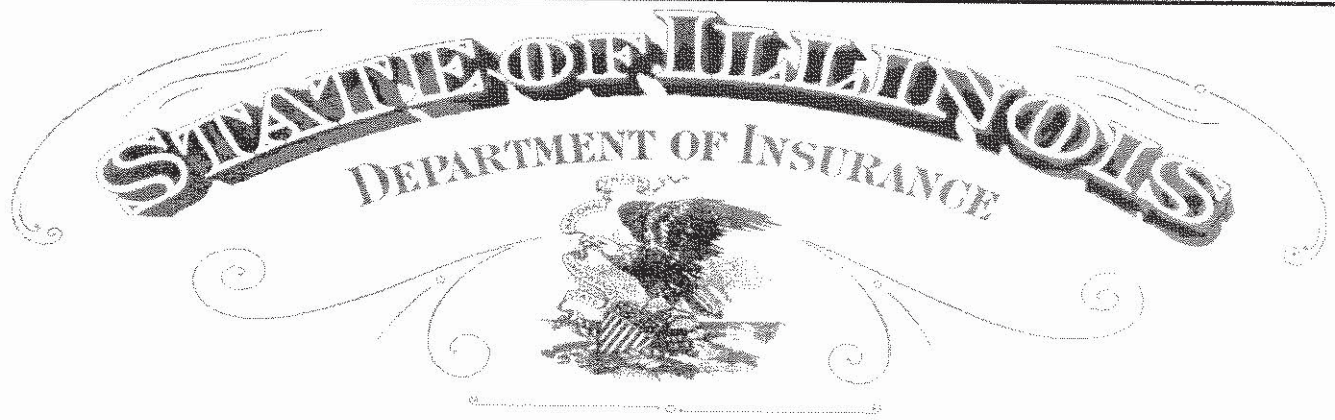
That the Report contains only facts ascertained from the books, papers, records, or documents, and other evidence obtained by investigation and examined or ascertained from the testimony of officers or agents or other persons examined under oath concerning the business, affairs, conduct, and performance of the Company.



Bernie O Sullivan Jr
Bernie Sullivan
Examiner-In-Charge

Subscribed and sworn to before me
this 10 day of October, 2013.

Fabiola Lara
Notary Public



IN THE MATTER OF:

PEKIN LIFE INSURANCE COMPANY, NAIC # 67628

STIPULATION AND CONSENT ORDER

WHEREAS, the Director ("Director") of the Illinois Department of Insurance ("Department") is a duly authorized and appointed official of the State of Illinois, having authority and responsibility for the enforcement of the insurance laws of this State; and

WHEREAS, Pekin Life Insurance Company, NAIC # 67628 (the "Company") is authorized under the insurance laws of this State and by the Director to engage in the business of soliciting, selling and issuing insurance policies; and

WHEREAS, a Market Conduct Examination of the Company was conducted by duly qualified examiners of the Department pursuant to Sections 132, 401, 402, and 425 of the Illinois Insurance Code (215 ILCS 5/132, 5/401, 5/402, and 5/425) covering the period of January 1, 2012 through December 31, 2012; and

WHEREAS, as a result of the Market Conduct Examination, the Department examiners filed a Market Conduct Examination Report which is an official document of the Department; and

WHEREAS, said report cited various areas in which the Company was not in compliance with the Illinois Insurance Code (215 ILCS 5/1 *et seq.*) and/or Department Regulations (50 Ill. Adm. Code 101 *et seq.*); and

WHEREAS nothing herein contained, nor any action taken by the Company in connection with this Stipulation and Consent Order, shall constitute, or be construed as, an admission of fault, liability or wrongdoing of any kind whatsoever by the Company;

WHEREAS, the Company is aware of and understands the various rights of the Company in connection with the examination and report, including the right to counsel, notice, hearing and appeal under Sections 132, 401, 402, 407 and 407.2 of the Illinois Insurance Code and 50 Ill. Adm. Code 2402; and

WHEREAS, the Company understands and agrees that by entering into this Stipulation and Consent Order, the Company waives any and all rights to notice and hearing; and

WHEREAS, the Company and the Director, for the purpose of resolving all matters raised by the report and in order to avoid any further administrative action, hereby enter into this Stipulation and Consent Order.

NOW, THEREFORE, IT IS agreed by and between the Company and the Director as follows:

1. The Market Conduct Examination indicated various areas in which the Company was not in compliance with provisions of the Illinois Insurance Code and/or Department Regulations; and
2. The Director and the Company consent to this Order requiring the Company to take certain actions to come into compliance with provisions of the Illinois Insurance Code and/or Department Regulations.

THEREFORE, IT IS HEREBY ORDERED by the undersigned Director that the Company shall:

1. Maintain procedures whereby all business accepted by the Company is only from licensed individuals/entities pursuant to 215 ILCS 5/500-70(a)(12).
2. Maintain procedures whereby commissions, administration fees and marketing fees are only paid to licensed individuals/entities pursuant to 215 ILCS 5/500-80 and as defined in the Illinois Department of Insurance Bulletin 2009-4.
3. Submit to the Director of Insurance, State of Illinois, proof of compliance with the above two (2) Orders within 30 days of the execution of this Order.
4. Pay to the Director of Insurance, State of Illinois, a civil forfeiture in the amount of \$20,000 to be paid within 30 days of the execution of this Order.

NOTHING contained herein shall prohibit the Director from taking any and all appropriate regulatory action as set forth in the Illinois Insurance Code, including but not limited to levying additional forfeitures, should the Company violate any of the provisions of this Stipulation and Consent Order or any provisions of the Illinois Insurance Code or Department Regulations.

On behalf of:
PEKIN LIFE INSURANCE COMPANY



Signature

Brian K Lee

Name

Senior Vice President & COO

Title

Subscribed and sworn to before me this
4th day of March A.D. 2014

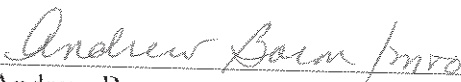


Notary Public



DEPARTMENT OF INSURANCE of the
State of Illinois:

DATE 3-19-2014


Andrew Boron
Director



Illinois Department of Insurance

PAT QUINN
Governor

ANDREW BORON
Director

March 27, 2014

Mr. Scott Martin
President
Pekin Life Insurance Company
2505 Court Street
Pekin, IL 61558-0001

Sent by USPS Certified Mail

Re: Market Conduct Examination of Pekin Life Insurance Company

Dear Mr. Martin:

Attached is your copy of the fully executed Stipulation and Consent Order that has been signed by Director Boron. In addition, the Department has received the \$20,000 civil forfeiture and necessary proof of compliance as required by the Stipulation and Consent Order.

The Department is closing its files on this exam. I intend to ask the Director to make the Examination Report available for public inspection as authorized by 215 ILCS 5/132.

Sincerely,

Lysa Saran
Acting Deputy Director of
Consumer Outreach and Protection
Illinois Department of Insurance
122 S. Michigan Avenue, 19th Floor
Chicago, IL 60603
Phone: 312-814-1767
Cell: 312-833-4396
E-mail: Lysa.Saran@Illinois.gov