

OCT 11 2010

Docketed by SS

REPRESENTING
ALEX SINK
CHIEF FINANCIAL OFFICER
STATE OF FLORIDA

IN THE MATTE	R OF:
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REVELEX CORPORATION

CASE NO.: 111292-10-AG

CONSENT ORDER

THIS CAUSE came on for consideration and final agency action. Upon consideration of the record, including the Settlement Stipulation for Consent Order dated September 30, 2010, and being otherwise fully advised in the premises, the Chief Financial Officer finds:

- 1. The Chief Financial Officer, as agency head of the Florida Department of Financial Services ("Department"), has jurisdiction over the subject matter of this case and the parties.
- 2. The entry of this Consent Order and compliance herewith by REVELEX CORPORATION ("Respondent") shall conclude the administrative proceeding of Case No. 111292-10- before the Department.

IT IS THEREFORE ORDERED:

(a) The Settlement Stipulation for Consent Order dated September 30, 2010, and attached hereto as "Exhibit A", is hereby approved and fully incorporated herein by reference.

- (b) Respondent shall pay investigative costs in the amount of TWELVE THOUSAND FIVE HUNDRED DOLLARS (\$12,500) within thirty (30) calendar days of the entry of this Consent Order. The Department shall initiate enforcement proceedings against Respondent should Respondent fail to pay the investigative costs within the specified time. Respondent hereby agrees to reimburse the Department for any and all costs and attorneys fees associated with such enforcement proceedings.
- (c) Respondent shall CEASE AND DESIST from sharing commissions with, or receiving commissions from, any person licensed as, or required to be licensed as, an insurer, an insurance agent or an insurance agency, including but not limited to a travel insurance agent or travel insurance agency.
- (d) If the Department discovers that Respondent, subsequent to the entry of this Consent Order, has shared commissions with, or received commissions from, any person licensed as, or required to be licensed as, an insurer, an insurance agent or an insurance agency, including but not limited to a travel insurance agent or a travel insurance agency, Respondent acknowledges that such conduct would represent a violation of the Settlement Stipulation for Consent Order and this Consent Order, including the cease and desist provisions contained herein, and that Respondent would be subject to the provisions of Section 626,9601, including the imposition of a fine in the amount of up to \$50,000.
- (e) Respondent shall CEASE AND DESIST from representing or aiding or abetting any unauthorized insurers, including but not limited to Prime Travel Protection, Inc.
- (f) If the Department discovers that Respondent, subsequent to the entry of this Consent Order, has directly or indirectly represented or aided or abetted any unauthorized insurer, Respondent acknowledges that such conduct would represent a violation of the

Settlement Stipulation for Consent Order and this Consent Order, including the cease and desist provisions contained herein, and that Respondent would be subject to the provisions of Section 626.9601, including the imposition of a fine in the amount of up to \$50,000.

- (g) Respondent, prior to allowing an insurer to advertise or sell its product in or from Florida on or through Respondent's website or software platform, shall ensure that the insurer is authorized, admitted, approved, or registered to sell insurance in Florida. Respondent shall determine, annually, that an insurer allowed to advertise or sell its product on or through Respondent's website or software platform remains authorized, admitted, approved, or registered to sell insurance in Florida.
- (h) Respondent, prior to allowing a travel agent, travel agency, or similar person to sell or solicit an insurance product in or from Florida on or from Respondent's website or software platform, shall notify the travel agent, travel agency or similar person that in order to sell travel insurance the travel agent, travel agency or similar person must be licensed as a travel insurance agent or travel insurance agency with the Florida Department of Financial Services, and must hold a valid appointment with an insurer.

DONE and ORDERED this / day of / 2010.

OF PROPERTY.

Division Director Agent & Agency Services

Copies Furnished To:

REVELEX CORPORATION C/O David Goodis, CEO 6405 Congress Ave., Suite 120 Boca Raton, FL 33487

Wes Strickland, Esq. Foley & Laudner LLP 106 E. College Ave., Suite 900 Tallahassee, FL 32301

PHILIP M. FOUNTAIN, ASSISTANT DIRECTOR Division of Agent & Agency Services 200 East Gaines Street Tallahassee, Florida 32399-0320

ROBERT ALAN FOX Division of Legal Services 200 East Gaines Street Tallahassee, Florida 32399-0333



IN THE MATTER OF:

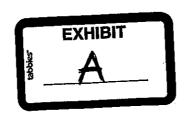
REVELEX CORPORATION

DFS Case No.: 111292-10-AG

SETTLEMENT STIPULATION FOR CONSENT ORDER

IT IS AGREED and STIPULATED by and between REVELEX CORPORATION ("Respondent") and the Department of Financial Services ("Department"), that:

- 1. Respondent does not hold any license issued under or pursuant to the Florida
 Insurance Code. At all times relevant to the dates and occurrences referred to herein,
 Respondent did not hold any license issued under or pursuant to the Florida Insurance Code.
- 2. Pursuant to Chapter 626, Florida Statutes, the Department has jurisdiction over the subject matter of this proceeding.
- 3. The Department conducted an investigation of Respondent. As a result thereof, the Department alleges that Respondent aided and abetted an unauthorized insurer, and illegally shared commissions. Respondent denies that it aided and abetted an unauthorized insurer, and denies that it illegally shared commissions. In order to avoid formal litigation of this matter, Respondent has determined that it is in its best interests to enter into this Settlement Stipulation for Consent Order.
- 4. Respondent voluntarily waives the right to a hearing in this matter and voluntarily enters into this Settlement Stipulation for Consent Order.



- 5. Respondent voluntarily waives the receipt of a notice of intent to impose cease and desist order pursuant to Section 120.60(5), Florida Statutes, or any notice or charges other than this Settlement Stipulation for Consent Order.
- 6. By entering into this Settlement Stipulation for Consent Order, the filing of a Consent Order in this case, and satisfying the administrative sanctions set forth therein, Respondent and the Department intend to and do resolve all issues pertaining to this administrative matter as outlined in paragraph three (3) above.
- 7. No party will appeal this Settlement Stipulation for Consent Order or the Consent Order to be issued in this case, and the parties specifically waive notice of the right to appeal as required by Section 120.569(1), Florida Statutes.
- 8. This document, and the resulting Consent Order, are public records and contain information that is routinely published and disclosed by the Department.
- 9. Each party to this proceeding shall bear its own costs and attorney's fees, except as otherwise provided herein.
- 10. This Settlement Stipulation for Consent Order is subject to the approval of the Chief Financial Officer or her designee. If the Chief Financial Officer or her designee does not approve of this Settlement, no Consent Order will be issued, and this Settlement Stipulation shall be null and void as if it were never executed. Upon the approval of the Chief Financial Officer or her designee, and without further notice, the Chief Financial Officer or her designee may issue a Consent Order providing for the following administrative sanctions:
- (a) Incorporation by reference of all of the terms and conditions of this Settlement Stipulation for Consent Order.
- (b) Respondent shall pay investigative costs in the amount of TWELVE THOUSAND FIVE HUNDRED DOLLARS (\$12,500) within thirty (30) calendar days of the entry of the Consent Order to be issued in this case. The Department shall initiate enforcement

proceedings against Respondent should Respondent fail to pay the investigative costs within the specified time. Respondent hereby agrees to reimburse the Department for any and all costs and attorneys fees associated with such enforcement proceedings.

- (c) Respondent shall CEASE AND DESIST from sharing commissions with, or receiving commissions from, any person licensed as, or required to be licensed as, an insurer, an insurance agent or an insurance agency, including but not limited to a travel insurance agent or travel insurance agency.
- (d) If the Department discovers that Respondent, subsequent to the entry of the Consent Order in this case, has shared commissions with, or received commissions from, any person licensed as, or required to be licensed as, an insurer, an insurance agent or an insurance agency, including but not limited to a travel insurance agent or a travel insurance agency, Respondent acknowledges that such conduct would represent a violation of this Settlement Stipulation for Consent Order and the Consent Order to be issued in this case, including the cease and desist provisions contained herein, and that Respondent would be subject to the provisions of Section 626.9601, including the imposition of a fine in the amount of up to \$50,000.
- (e) Respondent shall CEASE AND DESIST from representing or aiding or abetting any unauthorized insurers, including but not limited to Prime Travel Protection, Inc.
- (f) If the Department discovers that Respondent, subsequent to the entry of the Consent Order in this case, has directly or indirectly represented or aided or abetted any unauthorized insurer, Respondent acknowledges that such conduct would represent a violation of this Settlement Stipulation for Consent Order and the Consent Order to be issued in this case, including the cease and desist provisions contained herein, and that Respondent would be subject to the provisions of Section 626.9601, including the imposition of a fine in the amount of up to \$50,000.

- Respondent, prior to allowing an insurer to advertise or sell its product in or from (g) Florida on or through Respondent's website or software platform, shall ensure that the insurer is authorized, admitted, approved, or registered to sell insurance in Florida. Respondent shall determine, annually, that an insurer allowed to advertise or sell its product on or through Respondent's website or software platform remains authorized, admitted, approved, or registered to sell insurance in Florida.
- (li)Respondent, prior to allowing a travel agent, travel agency, or similar person to sell or solicit an insurance product in or from Florida on or from Respondent's website or software platform, shall notify the travel agent, travel agency or similar person that in order to sell travel insurance the travel agent, travel agency or similar person must be licensed as a travel insurance agent or travel insurance agency with the Florida Department of Financial Services, and must hold a valid appointment with an insurer.
- 11. The person signing this Settlement Stipulation for Consent Order on behalf of Respondent has the authority to enter into the Settlement Stipulation for Consent Order.
- 12. Respondent certifies that the address following its authorized representative's signature below is a valid address at which Respondent will receive the Consent Order when mailed to that address.

REVELEX CORPORATION

through David Goodis, its CEO 6405 Congress Ave., Suite 120

Boca Raton, Floirda 33487

Senior Attorney

Department of Financial Services

Division of Legal Services

200 East Gaines Street

Larson Building, Suite 624

Tallahassee, Florida 32399-0333

Attorney for the Department

Wes Strickland, Esq. Foley & Laudner LLP 106 E. College Ave., Suite 900 Tallahassee, FL 32301