

**BEFORE THE COMMISSIONER OF INSURANCE**

**STATE OF MISSISSIPPI**

**IN RE:           MATTER OF DELTA PROPANE GAS, INC. AND HEATHER DILLON**

**CONSENT AGREEMENT**

**WHEREAS**, the Liquefied Compressed Gas Division (the “Division”) of the Mississippi Insurance Department (“MID” or the “Department”) issued a Notice of Hearing and Statement of Charges (the “Notice”) against Delta Propane Gas, Inc. (“Delta Propane”), a Mississippi corporation, dated Dec. 4, 2017, and an Amended Notice of Hearing dated March 19, 2018, collectively attached hereto as **Exhibit A**, wherein the Division alleged certain failures by Delta Propane, and Delta Propane’s former employee, Heather Dillon (“Dillon”), to conform to the standards for the liquefied compressed gas industry set forth in Miss. Code Ann. §75-57-1, *et seq.*, implementing regulations, and provisions of the National Fire Protection Association (“NFPA”), including, without limitation, NFPA-54 and NFPA-58 incorporated therein; and,

**WHEREAS**, Delta Propane and Dillon are collectively referred to hereinafter as “Respondents”, and Respondents, the Division and MID are collectively referred to hereinafter as the “Parties”; and,

**WHEREAS**, pursuant to the Notice, an administrative proceeding was commenced before the Liquefied Compressed Gas Board (the “Board”), the separate state entity responsible for hearing propane-related disciplinary actions pursuant to Miss. Code Ann. § 75-57-47, 105 and 109, against Respondents; and,

**WHEREAS**, the charges set forth in the Notice related to an explosion and fire at the home of Mr. Robbie Russell and Mrs. Betty Russell, located at 77 County Road 1511, Bay Springs, Mississippi 39422, within the confines of Jasper County, Mississippi (“the Jasper County Fire”); and,

**WHEREAS**, an administrative proceeding was scheduled for a merits hearing in relation to the Jasper County Fire before the Board on July 12, 2018, but has been continued pending the negotiated resolution of the charges itemized in the Notice ; and,

**WHEREAS**, the Division has alleged that Respondents were involved with installing, supplying, and/or servicing a liquefied compressed gas system at the home of Patricia Isberto (“Ms. Isberto”) in Simpson County, Mississippi; and,

**WHEREAS**, the gas system at Ms. Isberto’s home reportedly experienced a flashback fire that allegedly produced injuries to Andrew Morrow and Kathleen Neely (the “Simpson County Fire”); and,

**WHEREAS**, the Division contends that, in connection with the Simpson County Fire, the Respondents failed in the particulars set forth in **Exhibit B** hereto to conform to the standards for the liquefied compressed gas industry set forth in Miss. Code Ann. §75-57-1, *et seq.*, implementing regulations, and provisions of the NFPA, including, without limitation, NFPA-54 and NFPA-58 incorporated therein; and,

**WHEREAS**, Respondents (1) deny generally the allegations in Exhibits A and B and make no admission of wrongdoing, and (2) deny specifically all allegations relating to the Simpson County Fire, and (3) deny their actions or inactions caused or contributed to cause either the Jasper County Fire or the Simpson County Fire but, being desirous to conclude MID's and the Division's investigations and disciplinary actions against Respondents related to the Jasper County Fire and the Simpson County Fire, and to avoid the expense of defending against the same; and,

**THEREFORE**, MID, the Division and Respondents agree as follows:

1. Heather Dillon agreed to surrender, and by way of the Voluntary Surrender of License form attached hereto as **Exhibit C**, has surrendered, her Driver/Installer Certificate No. 15-117 in the State of Mississippi as of June 9, 2018, which surrender was accepted by Mike Chaney, Commissioner of the Mississippi Insurance Department, effective June 18, 2018;

2. Delta Propane will pay a total Monetary Penalty of Thirty-Five Thousand Dollars (\$35,000), with the first of two installment payments in the amount of Twenty Thousand Dollars (\$20,000) being payable to the Mississippi Insurance Department on or before September 12, 2018, and the second of two installment payments in the amount of Fifteen Thousand Dollars (\$15,000) being payable to the Mississippi Insurance Department on or before December 21, 2018;

3. The effectiveness of this Consent Agreement is contingent on Delta Propane's agreement to a Corrective Action Plan ("CAP") to be executed contemporaneously with this Consent Agreement. .

4. Respondents hereby expressly waive all further procedural steps, and expressly waive all rights to seek judicial review of or to otherwise challenge or contest the validity of the Consent Agreement, the stipulations and the imposition of the discipline contained herein, and the consideration and entry of this Consent Agreement.

5. For and in consideration of the mutual promises exchanged herein, and other good and valuable consideration, the receipt of which is hereby acknowledged, Respondents forever release, acquit and discharge the State of Mississippi, the Division, the Department, Mike Chaney, Commissioner of the Mississippi Insurance Department (the "Commissioner") and State Fire Marshall and all the Division's and Department's officers, employees, agents, insurers and attorneys, in both their individual and official capacities, of and from any and all liability of every kind and nature for any cause of action that Respondents may have, asserted and unasserted, for all losses, damages, of each and every kind and nature, liquidated and unliquidated, including, without limitation, costs of litigation and attorney's fees, arising from

the Division's and the Department's investigations, proceedings and actions arising from or related to the Jasper County Fire and the Simpson County Fire, and covenant never to file suit or bring any legal action or claim against them in relation to said matters. This provision shall also have reciprocal and mutual application and effect, to the fullest extent possible and as allowable under the law, as to Respondents as well as their shareholders, officers, directors, insurers, attorneys, subsidiaries, affiliates and any and all other related companies.

6. For and in consideration of the mutual promises exchanged herein, and other good and valuable consideration, the receipt of which is hereby acknowledged, MID and the Division agree to withdraw any administrative disciplinary action initiated to date against the Respondents, or any of them, and to refrain from instituting any administrative disciplinary actions against them in the future arising out of the Jasper County Fire and/or the Simpson County Fire. Provided, however, that nothing herein shall infringe upon MID or the Division's powers to bring administrative disciplinary actions against Respondents for incidents unrelated to the Jasper County Fire or Simpson County Fire.

7. This Consent Agreement is in the best interest of the Parties, and represents compromise and settlement of the controversy between the Parties and is for settlement purposes only. By the signatures affixed below, Respondents affirmatively state that they have freely agreed to entry of this Consent Agreement; that they have had the benefit of legal counsel of their choice in connection with this matter; that they waive any right(s) to notice and a hearing on the matters underlying this Consent Agreement, and that no threats or promises of any kind have been made by the Commissioner, the Division, the Department, or any employee, agent or representative thereof. The Parties, by signing this Consent Agreement, affirmatively state their agreement to be bound by the terms of this Consent Agreement and aver that no promises or offers relating to the circumstances described herein, other than the terms of settlement set forth in this Consent Agreement, are binding upon them.

SO AGREED, as evidenced by our signatures:

  
\_\_\_\_\_  
Delta Propane Gas, Inc.

Date: 9-10-18

By: Eric Small, President  
*Its Authorized Representativ*

STATE OF ~~MISSISSIPPI~~ <sup>Kentucky</sup>  
COUNTY OF McCracken

Personally appeared before me, the undersigned authority in and for the said county and state, within my jurisdiction, the within named Eric Small, who acknowledged that he/she is the President for Delta Propane Gas, Inc., and that for an on behalf of the said corporation, and as its act and deed he/she executed the above and foregoing instrument, after first having been duly authorized by said corporation so to do.

So acknowledged before me on this the 10 day of September, 2018.

Erin Woods  
NOTARY PUBLIC

My commission expires:  
12-16-18

**ERIN WOODS**  
**NOTARY PUBLIC**  
**STATE AT LARGE, KENTUCKY**  
**COMM. #524609**  
**MY COMMISSION EXPIRES DECEMBER 16, 2018**

Heather B Dillon  
Heather Dillon

Date: 9-11-18

STATE OF MISSISSIPPI  
COUNTY OF RANKIN

Personally appeared before me, the undersigned authority in and for the said county and state, within my jurisdiction, the within named Heather Dillon, who acknowledged that she executed the above and foregoing instrument as her true act and deed.

So acknowledged before me on this the 11<sup>th</sup> day of SEPTEMBER, 2018.



William Stokes  
NOTARY PUBLIC

My commission expires: 8/31/2021

ACCEPTED BY:

Mike Chaney  
MIKE CHANEY  
COMMISSIONER OF INSURANCE

This the 12 day of October, 2018.



MIKE CHANEY  
Commissioner of Insurance  
State Fire Marshal

MARK HAIRE  
Deputy Commissioner of Insurance

RICKY DAVIS  
State Chief Deputy Fire Marshal

## MISSISSIPPI INSURANCE DEPARTMENT

501 N. WEST STREET, SUITE 1001  
WOOLFOLK BUILDING  
JACKSON, MISSISSIPPI 39201  
www.mid.ms.gov

MAILING ADDRESS  
Post Office Box 79  
Jackson, Mississippi 39205-0079  
TELEPHONE: (601) 359-3500  
FAX: (601) 359-2474

December 4, 2017

Mr. Eric Small  
United Propane Gas, Inc.  
4200 Cairo Road  
P.O. Box 2450  
Paducah, KY 42002-2450

VIA FIRST CLASS MAIL AND CERTIFIED MAIL  
RETURN RECEIPT REQUESTED

**Re: Notice of Hearing and Statement of Charges against United Propane Gas,  
Inc., a/k/a Delta Propane Gas, Inc.**

Dear Mr. Small:

This is your official notice that a hearing will be held by the State Liquefied Compressed Gas Board (hereinafter "the Board") in the offices of the Mississippi Department of Insurance (hereinafter "Department"), at the Mississippi Fire Academy, located at #1 Fire Academy USA, Pearl, Mississippi on Thursday, January 11, 2017, at 10:00 o'clock a.m., or as soon thereafter as the matter can be heard, relating to the following proposed action against you, United Propane Gas, Inc. a/k/a Delta Propane Gas, Inc. (hereinafter "Respondent").

### AUTHORITY

Miss. Code Ann. §75-57-9 adopts by reference National Fire Protection Association NFPA-54 and NFPA-58 as specifications for the purpose of material standards, construction, handling, transportation and installation of all liquefied compressed gas systems and inspection and operation of pressure vessels in this State. Per Miss. Code Ann. §§ 75-57-107 and 109, the Board is authorized to impose monetary penalties and take such other disciplinary action, including revocation of a liquefied gas permit, for violations of Title 75, Chapter 57, Miss. Code Ann and/or the adopted Regulations. Any permit revocation is subject to the approval of the Commissioner of Insurance.

### STATEMENT OF CHARGES

On or about September 25, 2017, the LC Gas Division ("Division") was notified of an explosion and fire at the home of Mr. Robbie Russell and Mrs. Betty Russell, located at 77 County Road 1511, Bay Springs, MS 39422, which was initially reported to local authorities at 3:38 pm that day. Three (3) fatalities were discovered at the scene and two (2) other individuals were badly burned when trying to help the deceased individuals.



Division Director Scotty Cuevas and DSFM Fire Inspector Kevin Butler conducted an inspection of the subject property on September 25, 2017, and performed other various activities in the months of September, October, and November of 2017 in order to fully investigate the incident.

The inspection revealed that the propane gas system located at the subject property violated numerous NFPA standards and other Mississippi Statutes and Regulations. The investigation revealed that Mr. Robbie Russell was listed as a new customer of the Respondent on August 17, 2017, and that Heather Dillon, an employee of the Respondent, improperly serviced the propane gas system on August 22<sup>nd</sup>, August 28<sup>th</sup> and September 25<sup>th</sup> of 2017. The inspection and investigation further revealed that the propane inside the subject property's 500 gallon propane tank lacked the smell of ethyl mercaptan (odorant) and lab tests later confirmed that the levels of ethyl mercaptan (odorant) in said propane, if any, were inadequate.

Based on the inspection and investigation, it is charged that Respondent's conduct constitutes safety violations that endangered human life and or property and the following charges are levied against the Respondent:

**Violation #1:** The Board was never notified that a Jr. Float Gauge was replaced on the 500 gallon propane tank in violation of Miss. Code Ann. § 75-57-47(1).

**Violation #2:** The 500 gallon propane tank was sitting on a concrete block with a 2x8 wood board being used as a leveler in violation of NFPA 58 Section 6.8.3.1 (2017)

**Violation #3:** The underground piping connected to the 500 gallon propane tank was black iron piping that was not corrosion resistant, was not suitable for the environment for which it was installed, and lacked a cathodic protection system in violation of NFPA 58 Sections 6.11.3.14 and 6.19.2 (2017).

**Violation #4:** The underground piping connected to the 500 gallon propane tank lacked dielectric fittings installed above ground and outdoors in violation of NFPA 58 Section 6.11.3.16 (2017).

**Violation #5:** The high pressure regulator connected to the 500 gallon propane tank lacked a second-stage regulator and allowed the operating pressure of the piping system to exceed five (5) PSI in violation of NFPA 58 Sections 6.10.2.2 and 6.10.2.6 (2017) and NFPA 54 Section 5.5.1 (2015).

**Violation #6:** The presence of ethyl mercaptan (odorant) in the propane delivered to Mr. Russel was not correctly verified by sniff testing or other means in violation of NFPA 58 Section 4.2.3 (2017).

#### **PROPOSED ACTION**

Please be advised that the Board's proposed action with regard to the foregoing Statement

of Charges is to revoke Respondent's L.C. Gas permit, and/or impose a monetary penalty as allowed under Miss. Code Ann. § 75-57-107. Any permit revocation shall be subject to approval of the Commissioner of Insurance.

A hearing is scheduled pursuant to Miss. Code Ann. § 75-57-109(2), and it is your opportunity to contest this proposed action. You will have the right to respond to the charges in writing, and you may appear at the hearing to offer testimony and present evidence on your behalf. You may retain legal counsel at your expense to represent or advise you at the hearing.

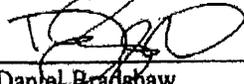
The Board will not provide a court reporter to make a record of the testimony given at the hearing. However, you may provide your own method of recording such testimony, including retaining a court reporter, at your own expense.

Any correspondence or other communication relating to this notice should be directed to the undersigned.

So issued, this the 4th day of December, 2017.

Sincerely,

MIKE CHANEY  
COMMISSIONER OF INSURANCE  
STATE OF MISSISSIPPI

BY: 

Daniel Bradshaw  
Senior Attorney

CC: VIA FIRST CLASS MAIL AND CERTIFIED MAIL RETURN RECEIPT REQUESTED

United Propane Gas, Inc.  
a/k/a Pearl River Propane Gas, Inc.  
400 Rimmer Street  
P.O. Box 457  
Walnut Grove, MS 39189

(Also VIA PERSONAL SERVICE)

United Propane Gas, Inc.  
a/k/a Delta Propane Gas, Inc.  
4972 Highway 49  
P.O. Box 974  
Mount Olive, MS 39119

Mr. Eric Gibson, General Counsel  
United Propane Gas, Inc.  
4200 Cairo Road  
P.O. Box 2450  
Paducah, KY 42002-2450

VIA EMAIL

Scottie Cuevas, LC-Gas Division Director ([scottie.cuevas@mid.ms.gov](mailto:scottie.cuevas@mid.ms.gov))  
Mr. Eric Gibson, General Counsel to UPG ([egibson@upgas.com](mailto:egibson@upgas.com))



## MISSISSIPPI INSURANCE DEPARTMENT

**MIKE CHANEY**  
Commissioner of Insurance  
State Fire Marshal

**MARK HAIRE**  
Deputy Commissioner of Insurance

**RICKY DAVIS**  
State Chief Deputy Fire Marshal

501 N. WEST STREET, SUITE 1001  
WOOLFOLK BUILDING  
JACKSON, MISSISSIPPI 39201  
[www.mid.ms.gov](http://www.mid.ms.gov)

MAILING ADDRESS  
Post Office Box 79  
Jackson, Mississippi 39205-0079  
TELEPHONE: (601) 359-3569  
FAX: (601) 359-2474

March 19, 2018

Delta Propane Gas, Inc.  
4972 Highway 49  
PO Box 974  
Mount Olive, Mississippi 39119

**VIA PERSONAL SERVICE AND CERTIFIED MAIL  
RETURN RECEIPT REQUESTED**

**Re: Official Notice of Hearing and Statement of Charges for May 10, 2018 Hearing before the  
State Liquefied Compressed Gas Board (Permit No. 1976)**

Dear Sir/Madam:

This is your official notice that a hearing will be held by the State Liquefied Compressed Gas Board (hereinafter "the Board") in the offices of the Mississippi Department of Insurance (hereinafter "Department"), at the Mississippi Fire Academy, located at #1 Fire Academy USA, Pearl, Mississippi on Thursday, May 10, 2018, at 10:00 o'clock a.m., or as soon thereafter as the matter can be heard, relating to the following proposed action against you, Delta Propane Gas, Inc. (hereinafter "Respondent").

### AUTHORITY

Miss. Code Ann. §75-57-9 adopts by reference National Fire Protection Association NFPA-54 and NFPA-58 as specifications for the purpose of material standards, construction, handling, transportation and installation of all liquefied compressed gas systems and inspection and operation of pressure vessels in this State. Per Miss. Code Ann. §§ 75-57-47, 107 and 109, the Board is authorized to impose monetary penalties and take such other disciplinary action, including revocation of a liquefied gas permit and/or certificate, for violations of Title 75, Chapter 57, Miss. Code Ann and/or the adopted Regulations. Any permit and/or certificate revocation is subject to the approval of the Commissioner of Insurance.

### STATEMENT OF CHARGES

On or about September 25, 2017, the LC Gas Division ("Division") was notified of an explosion and fire at the home of Mr. Robbie Russell and Mrs. Betty Russell, located at 77 County Road 1511, Bay Springs, MS 39422, which was initially reported to local authorities at 3:38 pm that day. Three (3) fatalities were discovered at the scene and two (2) other individuals were badly injured.

Division Director Scotty Cuevas and Deputy State Fire Marshal Kevin Butler conducted an inspection of the subject property on September 25, 2017, and have performed other various activities since that date in order to fully investigate the incident.

The inspection revealed that the propane gas system located at the subject property violated numerous NFPA standards and other Mississippi Statutes and Regulations. The inspection also revealed that the propane inside the subject property's 500 gallon propane tank lacked the smell of ethyl mercaptan (odorant) and lab tests

later confirmed that the levels of ethyl mercaptan (odorant) in said propane, if any, were inadequate.

The investigation revealed that Mr. Robbie Russell was listed as a new customer of the Respondent on August 17, 2017, and that Heather Dillon, an employee of the Respondent, improperly serviced the propane gas system on August 22<sup>nd</sup>, August 28<sup>th</sup> and September 25<sup>th</sup> of 2017. The inspection further revealed that the Respondent did not notify the Department of certain services and alterations made to the system on August 22<sup>nd</sup> and August 28<sup>th</sup> of 2017.

Based on the inspection and investigation, it is charged that Respondent's conduct constitutes safety violations that endangered human life and or property and the following charges are levied against the Respondent:

**Violation #1:** The 500 gallon propane tank was filled, the system was turned on to release gas into the system, and the Board was never notified in violation of Miss. Code Ann. § 75-57-47(1).

**Violation #2:** The high pressure regulator connected to the 500 gallon propane tank was disconnected and the tank was opened up releasing gas into the atmosphere creating an unsafe condition in violation of NFPA 54 Section 4.2.2 (2015).

**Violation #3:** The Board was never notified that a Jr. Float Gauge was replaced on the 500 gallon propane tank in violation of Miss. Code Ann. § 75-57-47(1).

**Violation #4:** A leak check was not performed and/or documented when the Jr. Float Gauge was replaced on the 500 gallon propane tank in violation of NFPA 54 Section 8.2.3 (2015) and Department Bulletin 2010-4.

**Violation #5:** The 500 gallon propane tank was sitting on a concrete block with a 2x8 wood board being used as a leveler in violation of NFPA 58 Section 6.8.3.1 (2017)

**Violation #6:** The underground piping connected to the 500 gallon propane tank was black iron piping that was not corrosion resistant, was not suitable for the environment for which it was installed, and lacked a cathodic protection system in violation of NFPA 58 Sections 6.11.3.14, 6.19.2, and 6.19.2(A) through 6.19.2(C) (2017).

**Violation #7:** The underground piping connected to the 500 gallon propane tank lacked dielectric fittings installed above ground and outdoors in violation of NFPA 58 Section 6.11.3.16 (2017).

**Violation #8:** The high pressure regulator connected to the 500 gallon propane tank lacked a second-stage regulator and allowed the operating pressure of the piping system to exceed five (5) PSI in violation of NFPA 58 Sections 6.10.2.2 and 6.10.2.6 (2017) and NFPA 54 Section 5.5.1 (2015).

**Violation #9:** The presence of ethyl mercaptan (odorant) in the propane delivered to Mr. Russell was not correctly verified by sniff testing or other means in violation of NFPA 58 Section 4.2.3 (2017).

PROPOSED ACTION

Please be advised that the Board's proposed action with regard to the foregoing Statement of Charges is to revoke Respondent's L.C. Gas permit and/or certificate, and/or impose a monetary penalty as allowed under Miss. Code Ann. § 75-57-107. Any permit and/or certificate revocation shall be subject to approval of the Commissioner of Insurance.

A hearing is scheduled pursuant to Miss. Code Ann. § 75-57-109(2), and it is your opportunity to contest this proposed action. You will have the right to respond to the charges in writing, and you may appear at the hearing to offer testimony and present evidence on your behalf. You may retain legal counsel at your expense to represent or advise you at the hearing.

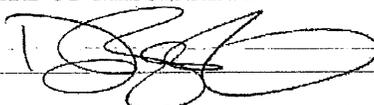
The hearing will be recorded electronically. However, the Board will not provide a court reporter to make a record of the testimony given at the hearing. You may provide your own method of recording such testimony, including retaining a court reporter, at your own expense.

Any correspondence or other communication relating to this notice should be directed to the undersigned.

So issued, this the 19th day of March, 2018.

Sincerely,

MIKE CHANEY  
COMMISSIONER OF INSURANCE  
STATE OF MISSISSIPPI

BY: 

Daniel Bradshaw  
Senior Attorney

Cc: VIA CERTIFIED MAIL RETURN RECEIPT REQUESTED

Mr. Eric Gibson, General Counsel  
United Propane Gas, Inc.  
4200 Cairo Road  
P.O. Box 2450  
Paducah, KY 42002-2450

Mr. Eric Small, President  
United Propane Gas, Inc.  
4200 Cairo Road  
P.O. Box 2450  
Paducah, KY 42002-2450

Mr. John G. Hansen  
McCoy Leavitt Laskey LLC  
8700 Monrovia, Suite 310  
Lenexa, KS 66215

VIA EMAIL

Scottie Cuevas, LC-Gas Division Director (scottie.cuevas@mid.ms.gov)  
Mr. Eric Gibson (egibson@upgas.com) (eric.gibson@upgas.com)  
Mr. John G. Hansen (jhansen@mlllaw.com)

Code violations alleged by the Division related to the Simpson County Fire:

1. The Customer could not smell propane.  
NFPA 58 (2017) - 4.2.3, page 14
2. The tank was delivered containing 52% propane.  
NFPA 58 (2017) - 9.6.21, page 75
3. No company identification on rental tank.  
MID - Regulation 2011-2 Section 4
4. The service line was 8" underground.  
NFPA 54 (2015) -7.1.2.1, page 58
5. No dielectric union was installed at the Customer's house.  
NFPA 58 (2017)- 6.11.3.16, page 45
6. CSST was installed in the home not bonded.  
NFPA 54 (2015) -7.13.2\*, page 62
7. Logs were listed for use with natural gas.  
NFPA 54 (2015)- 9.1.3, page 65
8. No State Report form was received.  
MS Law 75-57-47 (1)



**VOLUNTARY SURRENDER OF LICENSE**

I, Heather R. Dillon, having been advised of charges of alleged violations of the Mississippi Code and my rights to a hearing as provided in Miss. Code Ann. §§ 75-57-47, 105, 107 and 109 (Rev. 2016), and understanding that I am entitled to a hearing before the State Liquefied Compressed Gas Board to determine the reasonableness of any and all administrative actions against me by the Mississippi Insurance Department, whether pending, prospective, initiated or uninitiated as of the subscribed date, do hereby waive the right to a hearing and consent to the voluntary surrender of my Driver/Installer Certificate No. 15-117 in the State of Mississippi, effective immediately.

This Voluntary Surrender of License is being tendered in lieu of administrative action(s) by the Mississippi Insurance Department and before the State Liquefied Compressed Gas Board with regard to all formally asserted charges, informally asserted charges, unasserted charges, and any and all acts or omissions of any type, kind, or nature. By executing this Voluntary Surrender of License, I am not admitting, consenting, confessing, or acknowledging that I have violated any laws or regulations of the Mississippi Insurance Department or the State Liquefied Compressed Gas Board, nor shall the execution of this Voluntary Surrender of License be construed as an admission of liability, wrongdoing, or misconduct of any type, kind, or nature.

STATE OF MISSISSIPPI

COUNTY OF Simpson



Heather R. Dillon  
Heather R. Dillon

Sworn to and subscribed before me this, the 9th day of June, 2018

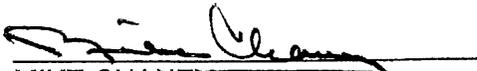
My Commission Expires \_\_\_\_\_

Steve Brandon  
Notary



*[Handwritten mark]*

Accepted by:

  
MIKE CHANEY  
COMMISSIONER OF INSURANCE

This the 18<sup>th</sup> day of June, 2018.

