



**DEPARTMENT OF INSURANCE, FINANCIAL
INSTITUTIONS AND PROFESSIONAL REGISTRATION**

P.O. Box 690, Jefferson City, Mo. 65102-0690

In re:

Greg John Campbell,
Respondent.

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Case No. 131010558C

CONSENT ORDER

John M. Huff, Director of the Department of Insurance, Financial Institutions and Professional Registration takes up the above matter for consideration and disposition. The Consumer Affairs Division, through counsel Mary S. Erickson, and Greg John Campbell, through counsel, Adam D. Fein, have reached a settlement in this matter and have consented to the issuance of this Consent Order.

1. John M. Huff is the duly appointed Director of the Missouri Department of Insurance, Financial Institutions and Professional Registration ("Director" of the "Department") whose duties, pursuant to Chapters 374, 375, and 381 RSMo,¹ include the supervision, regulation and discipline of insurance producers and business entity producers.

2. The Consumer Affairs Division has the duty of conducting investigations into the acts of insurance producers under the insurance laws of this state and is authorized by the

¹ All statutory references are to the 2012 Supplement to the Revised Statutes of Missouri unless otherwise noted.

Director to investigate and to recommend enforcement action for violations of the insurance laws of this state. *See* § 374.190 RSMo. (Supp. 2000).

3. The Department issued Greg J. Campbell an insurance producer license on March 3, 2006 (License No. 0366257). Campbell's insurance producer license will expire on March 3, 2014.

4. On June 7, 2013, Campbell pled guilty before the United States District Court, Eastern District of Missouri, to two counts of Felony Wire Fraud in violation of 18 U.S.C. §§ 2 and 1343. *United States of America v. Greg J. Campbell*, Case No. 4:13CR00224AGF.

5. On October 9, 2013, the court sentenced Campbell to 38 months' imprisonment and ordered restitution in the amount of \$1,851,956.47. *Id.*

6. On June 4, 2013, the Missouri Secretary of State ("SOS") and Campbell agreed to a "Consent Order" barring Campbell from applying for registration as a broker-dealer agent or investment advisor representative in Missouri and ordering him to pay restitution and civil penalties. *In the Matter of Greg John Campbell*, Case No. AP-13-01.

7. On March 14, 2013, the Financial Industry Regulatory Authority ("FINRA") and Campbell entered into a "Letter of Acceptance, Waiver and Consent" in which Campbell agreed to be barred from associating with any FINRA member in any capacity. FINRA No. 2012034193201.

8. Campbell is subject to discipline pursuant to § 375.141.1(6) for his convictions of Felony Wire Fraud in violation of 18 U.S.C. §§ 2 and 1343.

9. Campbell's insurance producer license may also be disciplined under § 375.141.1(2) for:

- a. Violating § 374.141.1.6 for failing to report to the Director the two administrative actions taken against him within 30 days of the final disposition; namely, the SOS Consent Order and the FINRA Letter of Acceptance, Waiver and Consent; and
- b. Violating § 375.141.7 for failing to report to the Director his criminal prosecution for a felony or crime involving moral turpitude within 30 days of the initial pretrial hearing date.

10. Campbell's conduct which led to his felony wire fraud convictions is grounds to discipline his insurance producer license pursuant to § 375.141.1(8) for using fraudulent, coercive, or dishonest practices, or demonstrating incompetence, untrustworthiness or financial irresponsibility in the conduct of business in this state.

11. Campbell admits the facts alleged by the Consumer Affairs Division as outlined in this Consent Order.

12. Campbell admits that these facts constitute grounds to discipline his insurance producer license pursuant to §§ 375.141.1(2), (6), and (8).

13. Campbell has the right to consult counsel at his own expense.

14. Campbell has been advised that he may, either at the time the Consent Order is signed by all parties, or within 15 days thereafter, submit the Consent Order to the Administrative Hearing Commission for determination that the facts agreed to by the parties to the Consent Order constitute grounds for disciplining Campbell's Missouri insurance producer license.

15. Except as provided in paragraph 14 above, Campbell stipulates and agrees to waive any rights that he may have to a hearing before the Administrative Hearing Commission

or the Director and any rights to seek judicial review or other challenge or contest of the terms and conditions of this Consent Order and forever releases and holds harmless the Department, the Director and his agents, and the Consumer Affairs Division from all liability and claims arising out of, pertaining to, or relating to this matter.

16. Each signatory to this Consent Order certifies by signing that he or she is fully authorized, in his or her own capacity, or by the named party he or she represents, to accept the terms and provisions of this Consent Order in their entirety, and agrees, in his or her personal or representational capacity, to be bound by the terms of this Consent Order.

Conclusions of Law

17. The facts admitted by Campbell are grounds to discipline his Missouri insurance producer license pursuant to § 375.141.1(2), (6), and (8).

18. The Director is authorized to settle this matter and issue this Consent Order in the public interest pursuant to §§ 374.046 and 621.045 and § 536.060 RSMo. (2000).

19. The terms set forth in this Consent Order are an appropriate disposition of this matter and entry of this Consent Order is in the public interest.

ORDER

IT IS ORDERED THAT Greg John Campbell's Missouri insurance producer license (No. 0366257) is hereby **REVOKED**.

SO ORDERED, SIGNED AND OFFICIAL SEAL AFFIXED THIS 12th **DAY OF**
NOVEMBER, 2013.




JOHN M. HUFF
Director, Missouri Department of
Insurance, Financial Institutions and
Professional Registration

CONSENT AND WAIVER OF HEARING

The undersigned persons understand and acknowledge that Respondent has the right to a hearing, but that Respondent has waived the hearing and consented to the issuance of this Consent Order.



Greg John Campbell, Respondent
c/o Adam D. Fein
Rosenblum, Schwartz, Rogers & Glass, P.C.
120 South Central Avenue, Suite 130
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11/11/13
Date



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Counsel for Respondent



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