



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

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

In the Matter of:

TODD ALLEN BOUNDS,

Respondent.

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Case No. 170131148C

CONSENT ORDER

Chlora Lindley-Myers, 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 John M. A. Conrace, and Todd Allen Bounds, have reached a settlement in this matter and have consented to the issuance of this Consent Order.

1. Chlora Lindley-Myers 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 385, RSMo¹, include the supervision, regulation, and discipline of motor vehicle extended service contract producers.

¹ All civil statutory references are to the Revised Statutes of Missouri (2000) as updated by the 2013 Supplement, unless otherwise noted.

2. The Consumer Affairs Division (“Division”) of the Department has the duty of conducting investigations into the qualifications of motor vehicle extended service contract (“MVESC”) producer license applicants under the insurance laws of this state and has been authorized by the Director to investigate and initiate actions before the Director to enforce the insurance laws of this state, including MVESC producer license application refusals.

3. On March 27, 2001, Todd Allen Bounds (“Bounds”) was charged with an Offense Relating to Motor Vehicles in violation of 625 ILCS 5/4-103(a)(1),² a Class 2 Felony. On July 9, 2001, the Court ordered Bounds complete two (2) year’s supervised probation. The Court discharged Bounds from probation on August 14, 2003. *State of Illinois v. Todd Bounds*, Madison Co. Cir. Ct., Case No. 2001CF00818.

4. On January 7, 2004, Bounds was charged with Unlawful Possession of Cannabis with Intent to Deliver in violation of 720 ILCS 550/5(d), a Class 3 Felony. On October 26, 2004, the Court sentenced Bounds to one (1) year supervised intensive probation. The Court discharged Bounds from probation on February 1, 2006. *State of Illinois v. Todd Bounds*, Madison Co. Cir. Ct., Case No. 2004-CF-000043.

5. On June 16, 2004, Bounds was charged with Theft of Labor or Services of Use of Property in violation of 720 ILCS 5/16-3(b), a Class 4 Felony. On October 26, 2004, the Court Ordered Bounds to pay restitution and sentenced Bounds to one (1) year supervised intensive probation. The Court discharged Bounds from probation on February 1, 2006. *State of Illinois v. Todd Bounds*, Madison Co. Cir. Ct., Case No. 2004-CF-001666.

6. On April 03, 2009, Bounds was charged with two (2) counts of Unlawful Delivery of Cannabis in violation of 720 ILCS 550/5(c), each a Class 4 Felony. On June 1, 2009

² All criminal statutory references are to those contained in the version of the Illinois Compiled Statutes under which the court rendered judgment.

Bounds pled guilty to and was convicted upon one (1) count for which he was sentenced to probation for a period of two (2) years. The Court discharged Bounds from probation on July 13, 2011. *State of Illinois v. Todd Bounds*, Madison Co. Cir. Ct., Case No. 2009-CF-000813.

7. On November 29, 2016, the Department received Bounds's application for an MVESC producer license ("Application").

8. Bounds disclosed his felony convictions on the Application.

9. Bounds acknowledges and understands that pursuant to § 385.209.1(5), the Director may refuse to issue an MVESC producer license to Bounds because he has been convicted of four (4) felonies.

10. Bounds acknowledges and understands that each felony conviction constitutes separate and sufficient ground for the Director to refuse his Application pursuant to § 385.209.1(5).

11. Bounds stipulates and agrees to waive any waivable 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 her agents, and the Division from all liability and claims arising out of, pertaining to, or relating to this matter.

12. Bounds acknowledges and understands that this Consent Order is an administrative action and will be reported by the Department to other states. Bounds further acknowledges and understands that this administrative action should be disclosed on future applications and renewal applications and that it is his responsibility to comply with the reporting requirements of each state in which he may be licensed.

13. 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

14. The facts admitted herein by Bounds are grounds to refuse his MVESC producer license application pursuant to § 385.209.1(5).

15. Section 385.209 provides, in part:

1. The director may suspend, revoke, refuse to issue, or refuse to renew a registration or license under sections 385.200 to 385.220 for any of the following causes, if the applicant or licensee or the applicant's or licensee's subsidiaries or affiliated entities acting on behalf of the applicant or licensee in connection with the applicant's or licensee's motor vehicle extended service contract program has:

* * *

(5) Been convicted of any felony[.]

16. The Director may impose orders in the public interest under § 374.046.

17. 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 the Department will issue a motor vehicle extended service contract producer license to Todd Allen Bounds, subject to the conditions set forth herein and the following special conditions:

1. Todd Allen Bounds shall report to the Consumer Affairs Division any violation of or failure to comply with Missouri insurance regulations and Missouri insurance laws, including

those set forth in Chapters 374, 375, and 385, within five (5) business days of such violation or failure to comply.

2. Todd Allen Bounds shall respond to all inquiries from the Consumer Affairs Division in accordance with 20 CSR 100-4.100(2)(A).

3. If a consumer complaint is communicated directly to Todd Allen Bounds, Bounds shall send the Department a copy of the complaint and a copy of Bounds's response to the consumer within five (5) business days of receipt of the consumer complaint.

4. Todd Allen Bounds shall report to the Consumer Affairs Division any and all of the following incidents involving Bounds: probation violation, probation revocation, guilty plea, *Alford* plea, nolo contendere plea, finding of guilt, or conviction concerning a felony or misdemeanor. Bounds shall report all such incidents to the Consumer Affairs Division within five (5) business days of their occurrence.

5. Todd Allen Bounds shall report to the Consumer Affairs Division any administrative action undertaken or initiated against Bounds in another jurisdiction or by another state or federal governmental agency in this state within five (5) business days after Bounds receives notification of the initiation of such administrative action.

6. The special conditions listed in paragraphs 1 through 5 will expire upon the earlier of the expiration or renewal of Todd Allen Bounds's two (2) year motor vehicle extended service contract producer license, or the refusal, surrender, or revocation of Bounds's motor vehicle extended service contract producer license.

IT IS FURTHER ORDERED that, for two (2) years subsequent to the date of this executed Consent Order, Todd Allen Bounds will voluntarily surrender his motor vehicle extended service contract producer license to the Department within thirty (30) days of Bounds's

entry of a guilty plea, *Alford* plea, nolo contendere plea, being found guilty, or being convicted of a felony, regardless of whether any sentence is suspended or executed.

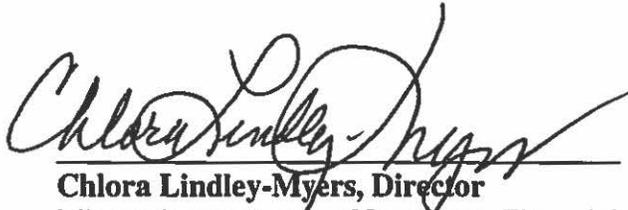
IT IS FURTHER ORDERED that, if Todd Allen Bounds maintains his motor vehicle extended service contract producer license and complies with the terms of this Consent Order, Bounds may apply to renew his motor vehicle extended service contract producer license and the Director shall consider his renewal application in accordance with Chapters 374, 375, and 385, but without regard to Bounds's prior felony convictions.

IT IS FINALLY ORDERED that the Director may pursue additional legal remedies, as determined appropriate by the Director, and without limitation, as authorized by Chapters 374, 375, and 385, including remedies for any violation of, or failure to comply with, the terms of this Consent Order.

SO ORDERED, SIGNED AND OFFICIAL SEAL AFFIXED THIS 20th DAY OF

June, 2017.




Chlora Lindley-Myers, Director
Missouri Department of Insurance, Financial
Institutions and Professional Registration

CONSENT AND WAIVER OF HEARING

The undersigned persons understand and acknowledge that Todd Allen Bounds may have a right to a hearing, but that Todd Allen Bounds has waived the hearing and consented to the issuance of this Consent Order.



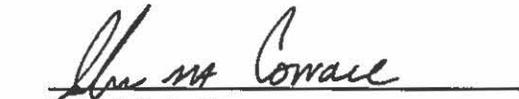
Todd Allen Bounds
313 Lakeside Dr.
Godfrey, Illinois 62035

6-9-17
Date

Counsel for Respondent
Name: _____
Missouri Bar No. _____
Address: _____

Telephone: _____

Date



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6-14-2017
Date