

No. **2025-9166**

**Official Order
of the
Texas Commissioner of Insurance**

Date: 3/4/2025

Subject Considered:

International Benefits Administrators, LLC
100 Garden City Plz. Ste. 110
Garden City, New York 11530-3201

Consent Order
SOAH Docket No. 454-23-02400
TDI Enforcement File No. 29638

General remarks and official action taken:

This is a consent order with International Benefits Administrators, LLC (IBA). For many years, IBA failed to maintain its qualifications to hold its third-party administrator (TPA) certificate of authority in Texas and failed to report to the Texas Department of Insurance (TDI) various material changes to its qualifications and other important regulatory information. Also, IBA failed to timely adjudicate and pay claims, improperly denied claims, operated or conducted business in a hazardous or injurious manner, and committed dishonest acts. IBA consents to the voluntary surrender of its certificate of authority effective 90 days from the date of this order, and agrees not to reapply for TPA authority for five years from the effective date of this surrender.

Waiver

IBA acknowledges that the Texas Insurance Code and other applicable law provide certain rights. IBA waives all of these rights, and any other applicable procedural rights, in consideration of the entry of this consent order.

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Findings of Fact

1. IBA is domiciled in New York and has held a third-party administrator (TPA) certificate of authority in Texas since April 9, 2010, under license number 2988992.

Failure to Notify TDI of Material Change to Tax Status

2. In Texas, TPAs must maintain the qualifications necessary to obtain a certificate of authority under Insurance Code Chapter 4151, including operating as a legal entity in the state.
3. TPAs are also required to notify TDI of any material changes of fact or circumstance that impact the accuracy or completeness of the information filed in its initial application for a certificate of authority. The TPA must notify TDI in writing not later than 30 days from the date it becomes aware of that material change.
4. According to the records of the Office of Texas Comptroller of Public Accounts (Comptroller), IBA's right to transact business in Texas was forfeited on February 20, 2015, when it failed to submit tax filings. IBA was reinstated to active status on November 4, 2022.
5. IBA failed to notify TDI in writing of the forfeiture of its right to transact business in Texas beginning on February 20, 2015, until May 20, 2022, when it admitted to this forfeiture.
6. IBA did not legally operate in Texas and was not qualified to hold its certificate of authority with TDI for more than seven years from February 20, 2015, through November 4, 2022.

IBA's Operations with American Financial Security Life Insurance Company

7. On May 6, 2010, IBA entered a claims services agreement with American Financial Security Life Insurance Company (AFSLIC).
8. On or around July 2020, IBA underwent a complete system overhaul which caused delays in handling AFSLIC claims and improper denials of AFSLIC claims. The issues included:

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- a. incorrectly entered claim information into its processing system;
 - b. unduly delayed the processing of Texas claims; and
 - c. improperly denied claims in whole or in part.

9. IBA employed inefficient procedures for claims handling, specifically:
 - a. subjecting insureds to lengthy hold times spanning multiple hours;
 - b. telling insureds "the system is down" and that no information was available;
 - c. using automated systems that made it difficult for insureds to access a live IBA representative to answer questions; and
 - d. sometimes requiring an insured to send multiple sets of the same documents to IBA to get coverage decisions.

10. IBA represents that in October 2021, it switched its customer service platform to the Javelina system allowing IBA to better manipulate its own data and timely process claims. IBA further represents the Javelina system allows IBA to directly address any delays in claims handling.

11. IBA further represents that thereafter it took proactive steps to ensure the system conversion issues were resolved, including hiring a new IT manager, conducting meaningful training sessions with its employees both virtually and in person, and has since reduced its claim turnaround times.

IBA's Misrepresentations and Failure to Disclose

12. Under Texas law, TPAs must annually file a report with the commissioner containing the information required by the commissioner and which must be verified by at least two officers of the TPA.

13. In its annual reports from 2010-2021, IBA omitted and failed to disclose to TDI that it provided claims services to AFSLIC, despite the aforementioned 2010 agreement between IBA and AFSLIC.

14. Despite repeated requests for information from TDI, IBA misled TDI and failed to provide TDI with accurate and complete information about the nature, timing, and extent of its relationship with AFSLIC.

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15. After repeated requests from TDI, IBA attempted to revise and amend its annual reports on four different occasions between February and September 2023, but still failed to provide TDI with accurate and complete information in most of its annual reports. To date, the reports are incomplete and incorrect.

Failure to Respond to TDI and to Maintain Accurate Mailing and Email Addresses

16. TPAs in Texas must maintain an accurate mailing address with TDI. On and after January 1, 2022, a TPA must also maintain a designated email address for official TDI communications. If emails can no longer be received at the designated email address, the TPA must notify TDI within 10 business days.
17. TDI sent multiple, reasonable requests for information to IBA, to which IBA failed to timely and completely respond. IBA's failure to respond was in part due to its failure to notify TDI of a change in its mailing address.
18. Prior to September 29, 2022, TDI was also unable to contact IBA using IBA's designated email address in TDI's records. That email address was inaccurate and IBA had not updated it since June of 2015.
19. On September 29, 2022, IBA submitted a notice to TDI seeking to retroactively change its mailing and email address, effective January 1, 2022. TDI updated its records effective the date the request was received.

Ongoing Failure to Notify TDI of Material Changes to Qualifications

20. Under Texas law and to qualify for its certificate of authority, a TPA must submit to TDI a biographical affidavit and a receipt for electronic fingerprints for each executive officer or comparable responsible person. A TPA is required to maintain the qualifications necessary to obtain a certificate of authority. Also, the TPA certificate holder must notify TDI of a change of control in the certificate holder's owner or any other fact or circumstance affecting the certificate holder's qualifications for the certificate of authority, not later than 30 days from the date the TPA first becomes aware of the material change in fact or circumstance.
21. According to TDI's records, for the last 15 years IBA has had only two officers or comparable responsible persons, specifically:

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- a. its Chief Operating Officer, Michael LaGalante (LaGalante), individual identification number 1032816, since September 2002; and
 - b. its President, Carol Joyce Sonnenberg (Sonnenberg), individual identification number, 338662, since January 2000.
22. In September 2022, when IBA submitted changes to its mailing and email addresses to TDI, IBA changed its designated contact email address to an email address for Michael Fowler (Fowler).
 23. IBA's publicly viewable website has an "About Us" subpage which identifies persons that are not in TDI's records, but that are on IBA's executive team, including: Fowler as IBA's president; Matthew Blessing (Blessing)¹ as chief operating officer; and, LaGalante as IBA's executive vice president. Sonnenberg is not shown on IBA's website at all.
 24. TDI does not have a biographical affidavit or a receipt for electronic fingerprints for Fowler or Blessing.
 25. IBA failed to notify TDI of material changes of fact or circumstance affecting its qualifications for its certificate of authority when it removed Sonnenberg as an IBA executive officer or responsible person, and when it added Fowler as its president and Blessing as its chief operating officer.
 26. IBA has not submitted to TDI a revised officers and directors page form FIN306 to identify changes to its executive officers or comparable responsible persons, or a receipt for electronic fingerprints and a biographical affidavit form FIN484 (also known as the LHL081) for Fowler and Blessing.

Disciplinary Actions in Nine Other States

27. IBA has been disciplined numerous times by its insurance regulators in nine other states over the last 12 years, demonstrating it operates or conducts business in a hazardous or injurious manner, and has engaged in dishonest acts by failing to disclose or report other states' administrative actions to the states of Ohio, New York, Utah, Pennsylvania, and South Dakota.

¹ TDI's records show that under NPN 15913585, Blessing is a Missouri resident holding non-resident general lines and surplus lines agent licenses in Texas.

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Wisconsin

28. On February 10, 2012, IBA entered into a Stipulation and Order with the Commissioner of Insurance of the State of Wisconsin imposing a monetary penalty and in which IBA admitted that it failed to properly respond to inquiries and failed to submit its employee benefit plan administrators' renewal application.

Oklahoma

29. On April 12, 2012, the Oklahoma Insurance Department entered a Conditional Administrative Order and Notice of Right to be Heard, imposing a small fine against IBA for acting as a TPA in Oklahoma without a valid license.

Louisiana

30. On May 10, 2013, the Louisiana Department of Insurance sent IBA a Notice of Fine for failing to file the required annual report and pay the necessary fee for the 2012 reporting period.
31. On January 6, 2016, the Louisiana Department of Insurance sent IBA an Amended Notice of Fine due to IBA's repeated failure to file the required annual report for the 2015 reporting period. This amendment followed the original Notice of Fine issued December 30, 2015.

New Jersey

32. On August 26, 2015, the State of New Jersey Department of Banking and Insurance entered a Conditional Order revoking IBA's TPA license for failing to file its 2014 annual report. New Jersey's records show that IBA presently holds an active TPA license.

Ohio

33. On October 13, 2017, IBA entered into a consent order with the Ohio Department of Insurance imposing small fine and in which IBA admitted that beginning in 2012 it failed to disclose in each Ohio renewal application that it was the subject of an administrative action in:

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- a. Wisconsin in April [sic] of 2012;
 - b. New Jersey in August of 2015;
 - c. Utah in November of 2015; and
 - d. Louisiana in December of 2015.
34. On December 16, 2024, IBA entered into a consent order with the Ohio Department of Insurance imposing civil penalties and administrative costs and in which IBA admitted that in its June 2024 renewal application it failed to disclose that it was the subject of an administrative action in:
- a. South Dakota in January of 2023, specifically license denial; and
 - b. South Dakota in May of 2023, specifically a cease and desist order.

New York

35. On November 17, 2017, IBA and Michael H. Sonnenberg, its sublicensee, entered into a Stipulation with the New York State Department of Financial Services for failing to report that IBA was subject to administrative actions in:
- a. South Dakota in August of 2011;
 - b. Wisconsin in February of 2012;
 - c. Louisiana in June of 2013;
 - d. Utah in November of 2015; and
 - e. Louisiana in January of 2016.

36. Additionally, the New York Stipulation imposed a fine, finding that IBA provided materially incorrect and untrue information in its 2013 and 2015 renewal applications by failing to disclose administrative actions and fines entered against IBA.

Utah

37. Between 2015 and 2020, IBA was subject of three administrative actions by the Utah Insurance Department.
38. On November 6, 2015, Utah imposed a small fine and issued a Notice of Informal Agency Action and Order against IBA for failing to timely respond to an inquiry.

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39. On August 23, 2016, IBA entered into a Stipulation and Order with Utah imposing a fine for failing to report at least 4 other state administrative actions taken against IBA and using an unregistered assumed name.
40. On February 14, 2020, Utah imposed a monetary penalty and issued a Notice of Informal Adjudicative Proceeding and Order against IBA for failing to maintain a valid contact email address, mailing address, and telephone number.

Pennsylvania

41. IBA has been the subject of two recent administrative actions by the Insurance Commissioner of the Commonwealth of Pennsylvania.
42. On August 8, 2019, IBA entered into a consent order with the Insurance Commissioner of the Commonwealth of Pennsylvania (the First Pennsylvania Order) for its failure to disclose administrative actions taken against it and its qualifying active officer.
43. In the First Pennsylvania Order, IBA admitted it was subject to six out-of-state administrative actions, resulting in fines totaling \$4,500. Specifically, the actions by:
 - a. South Dakota of Insurance on August 9, 2011, for failure to timely file an annual report;
 - b. Wisconsin Office of the Commissioner of Insurance on February 23, 2012, for a late or incomplete response to inquiries from Wisconsin's Commissioner;
 - c. Oklahoma Insurance Department on April 12, 2012, for acting or presenting itself as a TPA without a valid license;
 - d. Louisiana Department of Insurance on June 24, 2013, for failure to timely file an annual report;
 - e. Utah Insurance Department on November 6, 2015, for failure to respond and failure to timely file; and
 - f. Louisiana Department of Insurance on December 30, 2015, for a TPA violation and failure to timely file an annual report.

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44. In the First Pennsylvania Order, IBA also admitted that its qualifying active officer, Michael Sonnenberg, was subject to three administrative actions resulting in fines totaling \$3,750. Specifically, the actions by:
 - a. New York Department of Financial Services on November 21, 2017, for failure to make a required disclosure on a license application;
 - b. Louisiana Department of Insurance action on February 23, 2018, for failure to timely file and failure to disclose actions on a license application; and
 - c. Delaware Department of Insurance action on May 2, 2018, for failure to disclose an administrative action taken against him.
45. In the First Pennsylvania Order, IBA was ordered to cease and desist from the violations listed and to pay a fine of \$2,500.
46. On June 15, 2021, IBA entered into a second consent order with the Insurance Commissioner of the Commonwealth of Pennsylvania (the Second Pennsylvania Order) wherein IBA admitted it failed to report other state actions and failed to disclose other state actions on its renewal application. Specifically, the actions by:
 - a. Utah Department of Insurance on February 14, 2020, for failing to maintain a valid contact email address, mailing address, and telephone number; and
 - b. South Dakota Department of Insurance on March 9, 2020, denied IBA's license application for failing to report the Utah administrative action.
47. IBA was ordered to cease and desist from the violations listed in the Second Pennsylvania Order and ordered to pay a small fine.

South Dakota

48. To date, IBA has been the subject of six administrative actions by the South Dakota Division of Insurance Department of Labor and Regulation (South Dakota Division of Insurance).
49. On August 9, 2011, the South Dakota Division of Insurance imposed a fine in a Consent Order against IBA, based on IBA's admission it failed to file its annual report.

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50. On July 21, 2016, IBA entered into a second Consent Order with the South Dakota Division of Insurance wherein IBA admitted it acted as a TPA without a registration since July of 2014. The second Consent Order granted IBA's registration application and imposed a \$20,000 monetary penalty after finding that IBA had previously been subject to:
 - a. a 2011 Consent Order for failing to timely file its annual report;
 - b. a 2012 warning letter for failing to disclose a Wisconsin administrative action on IBA's TPA renewal application; and
 - c. investigations for failing to report a 2013 Louisiana administrative action taken against IBA and failing to timely respond to inquiries.

51. On October 15, 2018, IBA entered into a third Consent Order with the South Dakota Division of Insurance wherein IBA admitted it again acted without a registration beginning in July of 2017. This third Consent Order granted IBA's registration and license applications and imposed a \$30,000 monetary penalty, and also found that in its 2018 business entity license application, IBA failed to include copies of all its prior administrative actions taken against it.

52. On March 9, 2020, the South Dakota Division of Insurance denied IBA's application for a TPA registration because IBA:
 - a. failed to timely respond to multiple inquiries;
 - b. has at least 12 administrative actions on its record;
 - c. has been the subject of at least 60 complaints; and
 - d. routinely failed to maintain adequate records and routinely failed to timely pay consumer claims.

53. On January 20, 2023, the South Dakota Division of Insurance denied IBA's application for a TPA registration because IBA:
 - a. failed to supply any of the required documents with its application;
 - b. failed to timely and completely respond to the South Dakota Division of Insurance's requests for the missing documents;
 - c. withheld information from South Dakota Division of Insurance;
 - d. continued to adjudicate claims in South Dakota without proper licensure; and
 - e. has been the subject of at least 11 prior investigations.

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54. Most recently, on May 24, 2024, the South Dakota Division of Insurance issued a Final Decision against IBA, ordering that IBA permanently cease and desist from transacting any TPA business in South Dakota because IBA:
- a. has been the subject of multiple other state administrative actions;
 - b. has been the subject of multiple South Dakota Division of Insurance actions;
 - c. has not held an active TPA registration in South Dakota since June of 2020 but continued to act as a TPA without registration; and
 - d. failed to timely respond to inquiries about its unlicensed TPA actions.

Conclusions of Law

1. The commissioner has jurisdiction over this matter under TEX. INS. CODE §§ 82.051–82.055, 84.021–84.044, 4151.051, 4151.056, 4151.212, and 4151.301-4151.308; and 28 TEX. ADMIN. CODE §§ 7.1601-7.1618.
2. The commissioner has the authority to informally dispose of this matter as set forth in TEX. GOV'T CODE § 2001.056, TEX. INS. CODE §§ 36.104 and 82.055, and 28 TEX. ADMIN. CODE § 1.47.
3. IBA has knowingly and voluntarily waived all procedural rights to which it may have been entitled regarding the entry of this order, including, but not limited to, issuance and service of notice of intention to institute disciplinary action, notice of hearing, a public hearing, a proposal for decision, rehearing by the commissioner, and judicial review.
4. IBA is subject to discipline under TEX. INS. CODE §§ 4151.056, 4151.301-4151.303, and 4151.308 because it:
 - a. willfully violated insurance laws of this state, as contemplated by TEX. INS. CODE § 4151.301(1);
 - b. engaged in dishonest acts or practices, in violation of TEX. INS. CODE § 4151.301(5);
 - c. was in a financial condition, or was operating or conducting business in a manner that would render further transaction of business in this state

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- hazardous or injurious to insured persons or the public, as contemplated by TEX. INS. CODE § 4151.301(8);
- d. has willfully violated commissioner rules, as contemplated by TEX. INS. CODE § 4151.301(10);
 - e. failed to meet a qualification for which issuance of the certificate of authority could have been denied had the failure then existed and been known to the commissioner, as contemplated in TEX. INS. CODE § 4151.301(12); and,
 - f. has failed to timely file the annual report required by TEX. INS. CODE § 4151.205, as contemplated by TEX. INS. CODE § 4151.301(14).
5. IBA may be considered to be operating or conducting business in a hazardous or injurious manner because it:
- a. failed to file financial statements, documents, records, or reports required under the Texas Insurance Code 4151 or Subchapter P, Chapter 7, in Title 28 of the Texas Administrative Code within the time periods prescribed by law, as contemplated in 28 TEX. ADMIN. CODE § 7.1616(a)(1);
 - b. filed false or misleading financial information, as contemplated in 28 TEX. ADMIN. CODE § 7.1616(a)(2);
 - c. has not maintained records sufficient to permit examiners to determine its financial condition or compliance with the Insurance Code, the Labor Code, and rules adopted thereunder, as contemplated in 28 TEX. ADMIN. CODE § 7.1616(a)(4);
 - d. does not employ management staff with the experience, competence, or trustworthiness to conduct its operations in a safe or sound manner, as contemplated in 28 TEX. ADMIN. CODE § 7.1616(a)(5);
 - e. not complied or is not complying with the terms of a written agreement with an insurer, HMO, plan sponsor, or group, as contemplated in 28 TEX. ADMIN. CODE § 7.1616(a)(7);

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- f. engaged or is engaged in a pattern of failing to settle claims in accordance with contractual, regulatory, or statutory requirements, as contemplated in 28 TEX. ADMIN. CODE § 7.1616(a)(8);
 - g. engaged or is engaged in dishonest practices or acts, as contemplated in 28 TEX. ADMIN. CODE § 7.1616(a)(9); and
 - h. engaged in other facts and circumstances that relate to the financial condition or business operations or business of an administrator in Texas that indicate the administrator is operating in a hazardous or injurious manner, as contemplated in 28 TEX. ADMIN. CODE § 7.1616(b).
6. Under TEX. INS. CODE §§ 4151.056, 4151.212 and 28 TEX. ADMIN. CODE §§ 7.1601(c) and 7.1607(e), the department may revoke or refuse to renew IBA's certificate of authority because IBA failed and continues to fail to maintain its qualifications necessary to maintain its certificate of authority, at all times.
7. IBA's tax status was forfeited from February 20, 2015 through November 4, 2022, and therefore it was not operating as a legal entity in Texas during that time period, in violation of TEX. INS. CODE §§ 4151.001(3), 4151.051, and 4151.053(1)-(2); and 28 TEX. ADMIN. CODE § 7.1601(c).
8. IBA is presently violating 28 TEX. ADMIN. CODE § 7.1604(b) and (d) by failing to submit a revised officers and directors page form FIN306, and a receipt for electronic fingerprints and a biographical affidavit form FIN484 (also known as the LHL081) for each of IBA's executive officers or other comparable responsible persons.
9. IBA violated 28 TEX. ADMIN. CODE § 7.1607(b) and (d) by failing to timely notify TDI in writing of material changes in fact or circumstance impacting its qualifications for its certificate of authority, specifically:
 - a. the forfeiture of its tax status by the Comptroller, which constitutes an administrative action by another state agency and thus, canceled or otherwise revoked IBA's authority to legally operate in the state of Texas; and
 - b. the removal and addition of executive officers or other comparable persons responsible for IBA's operations as a fiduciary.

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10. IBA violated TEX. INS. CODE § 4151.205 by failing to include all information required by the commissioner in its annual reports, including the omission and failure to disclose the provision of claims services to AFSLIC for 12 years.
11. IBA violated TEX. INS. CODE § 4151.111 by failing to timely adjudicate and pay claims.
12. IBA violated TEX. INS. CODE § 38.001 by failing to timely and completely respond to multiple, reasonable requests for information from TDI.
13. IBA violated 28 TEX. ADMIN. CODE § 7.1607(a)(1) and (b) by failing to timely notify TDI in writing of a change in its mailing address.
14. IBA violated 28 TEX. ADMIN. CODE § 1.1302(c), on and after January 1, 2022, by failing to timely designate a change to its email address.

Order

It is ordered that the third party administrator certificate of authority held by International Benefits Administrators, LLC is surrendered, effective 90 days from the date of this order. International Benefits Administrators, LLC and is barred from applying for the issuance of any permit, license, or other authorization issued or existing under the authority of the commissioner of insurance of the state of Texas for five years from the effective date of its surrender.

It is further ordered that International Benefits Administrators, LLC must immediately cease and desist accepting any new third party administrator business in Texas.

It is further ordered that on or before 90 days from the date of this order, International Benefits Administrators, LLC must comply with the requirements contemplated in 28 TEX. ADMIN. CODE § 7.1615, by providing a complete and accurate original set, copy of the original set, or an image of the original set of its books and records, in an organized and usable manner to either an authorized successor administrator, or to the insurer, HMO, plan sponsor, or group to whom those records belong.

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It is further ordered that 90 days after the date of this order, International Benefits Administrators, LLC must cease and desist engaging in the business of a third party administrator in Texas.

Signed by:

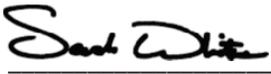
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Cassie Brown
Commissioner of Insurance

Recommended and reviewed by:



Leah Gillum, Deputy Commissioner
Fraud and Enforcement Division



Sarah White, Staff Attorney
Enforcement

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Affidavit

STATE OF Florida §
§
COUNTY OF Broward §

Before me, the undersigned authority, personally appeared Michael Fowler, who being by me duly sworn, deposed as follows:

"My name is Michael Fowler. I am of sound mind, capable of making this statement, and have personal knowledge of these facts which are true and correct.

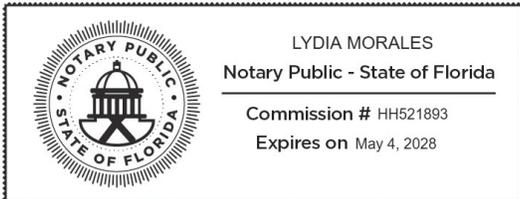
I hold the office of CEO/President and am the authorized representative of International Benefits Administrators, LLC. I am duly authorized by said organization to execute this statement.

IBA has knowingly and voluntarily entered into the foregoing consent order and agrees with and consents to the issuance and service of the same by the commissioner of insurance of the state of Texas."

[Signature]
Affiant

SWORN TO AND SUBSCRIBED before me on 12th February 2025, ~~202~~₂₅.

(NOTARY SEAL)



HH521893 05/04/2028

[Signature]
Signature of Notary Public
Lydia Morales Online Notary
Printed Name of Notary Public

DESCRIPTION OF ATTACHED DOCUMENT

Title or Type of Document: Certificate of Acknowledgement

Document Date: 02/12/2025

Number of Pages (including notarial certificate): 17

State of Florida

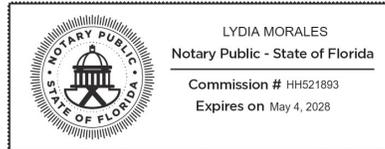
County of Broward

This foregoing instrument was acknowledged before me by means of online notarization,

this 02/12/2025 by Michael Fowler.



Lydia Morales



HH521893

05/04/2028

Personally Known OR Produced Identification

Type of Identification Produced Driver's license