STATE OF OREGON
DEPARTMENT OF CONSUMER AND BUSINESS SERVICES
DIVISION OF FINANCIAL REGULATION

In the Matter of: LAUREN E. WOODBROOK, Respondent.	DCBS Case No. INS-23-0012 OAH Case No. 2023-ABC-06047 FINAL ORDER TO CEASE AND DESIST AND ORDERS DENYING LICENSE APPLICATION AND ASSESSING CIVIL PENALTIES

HISTORY OF THE CASE

On February 28, 2023, the Department of Consumer & Business Services, Division of Financial Regulation (Division) issued an Order to Cease and Desist, Proposed Orders Denying License Application and Assessing Civil Penalties, and Notice of Right to a Hearing (Notice Order) to Lauren E. Woodbrook. On March 27, 2023, Ms. Woodbrook requested a hearing.

On June 21, 2023, the Division referred the matter to the Office of Administrative Hearings (OAH). The OAH assigned Senior Administrative Law Judge (ALJ) Dove Gutman to preside at the hearing.

On July 20, 2023, ALJ Gutman held a prehearing conference by telephone. Ms. Woodbrook appeared without counsel. Assistant Attorney General (AAG) Jacob Gill represented the Division, and Noah Olson and Jason Flanagan appeared for the Division. ALJ Gutman scheduled a hearing for November 9, 2023, and set various filing deadlines.

On September 28, 2023, the Division issued a First Amended Notice Order, which included additional statutory bases for denying Ms. Woodbrook's license applications.

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On October 19, 2023, the OAH reassigned the matter to ALJ Joe Allen. Also on October 19, 2023, the Division requested a change of ALJ. On October 23, 2023, the OAH granted the Division's request and reassigned the matter to ALJ Elizabeth Jarry.

On November 2, 2023, the Division issued a Second Amended Notice Order, which included minor changes.

ALJ Jarry convened a videoconference hearing on November 9, 2023. Ms. Woodbrook appeared without counsel and testified. AAG Nathan Karman and AAG Gill represented the Division. Mr. Flanagan appeared for the Division and testified. Mr. Olson also appeared for the Division. The record remained open for receipt of the parties' written closing arguments. On December 1, 2023, the record closed after the parties filed their closing arguments.

On December 28, 2023, ALJ Jarry issued a Proposed Order and provided notice to the parties of their right to file exceptions to the Proposed Order within 30 days of its issuance. Neither party filed exceptions within the 30-day deadline; however, on January 29, 2024 Woodbrook sent an email to ALJ Jarry, with a copy to the Division, requesting that the Civil Penalties included in the Proposed Order be removed.

Although it was not timely filed, the Division has considered Woodbrook's email. The email raised issues that are immaterial and irrelevant. Moreover, the email inaccurately characterized evidence in the record. For those reasons, the Division finds Woodbrook's January 29, 2024 email unpersuasive.

Having considered the record in this matter, the Proposed Order, and the arguments raised in Woodbrook's January 29, 2024 email, the Division adopts the Proposed Order as the Final Order in this case.

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ISSUES

1. Whether Ms. Woodbrook provided incorrect, misleading, incomplete, or materially untrue information on her March 2022 application for an Oregon resident insurance producer license. ORS 744.074(1)(a).

2. Whether Ms. Woodbrook violated the insurance laws of another state. ORS 744.074(1)(b).

3. Whether Ms. Woodbrook used fraudulent, coercive, or dishonest practices, or demonstrated incompetence, untrustworthiness, or financial irresponsibility in the conduct of business in Louisiana. ORS 744.074(1)(h).

4. Whether Ms. Woodbrook's insurance producer license was suspended in another state. ORS 744.074(1)(i).

5. Whether Ms. Woodbrook's applications for an Oregon resident insurance producer license should be denied. ORS 744.074(1)(a), (b), (h), and (i).

6. Whether the Director may order Ms. Woodbrook to cease and desist from violating ORS 744.074(1)(a). ORS 731.252(1).

7. Whether the Director should assess a civil penalty of $500 against Ms. Woodbrook for violating ORS 744.074(1)(a). ORS 731.988(1).

EVIDENTIARY RULINGS

Exhibits A1 through A6, offered by the Division, and Exhibits R1, R3, R4a through R4c, R5 through R12, R13a and b, and R14 through R17, offered by Ms. Woodbrook, were admitted into the record without objection.[1]

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[1] The ALJ and the Division did not receive Exhibit R2 from Ms. Woodbrook. At the hearing, the ALJ determined that Exhibit R2 was duplicative of an exhibit submitted by the Division.

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FINDINGS OF FACT

1. From the late 1990s to 2004, Ms. Woodbrook was employed by Henry Powell, Jr., an insurance producer in Louisiana. (Exs. R16 at 1; A1 at 1.) She and Mr. Powell also engaged in a romantic relationship from approximately 1999 to 2005. (Ex. R16 at 1.)

2. The Louisiana Department of Insurance licensed Ms. Woodbrook, under the name Laura E. Watkins, beginning in 1999. (Exs. A1 at 1-3; R5 at 1.) Her National Producer Number is 4704968. (Ex. A2 at 1.)

3. Ms. Woodbrook managed Mr. Powell's office, and her duties included paying bills and commissions to other brokers. Mr. Powell authorized her to write her own pay and commission checks from a bank account in which the business deposited commission payments. (Ex. R16 at 1-2.) From the same bank account, Ms. Woodbrook also took additional money without authorization from Mr. Powell during the period 1999 to 2004. (Exs. R5 at 1; R16 at 1-2.)

4. On December 29, 2004, Ms. Woodbrook was arrested in the State of Louisiana for multiple counts of Bank Fraud, Forgery, and Theft. (Exs. A4 at 64-72; R10 at 1.)

5. On March 3, 2005, the District Attorney for the Parish of Tangipahoa, State of Louisiana, filed 50 charges of Theft against Ms. Woodbrook.[2] For each charge, the District Attorney alleged that she misappropriated or took property valued over $500 belonging to Mr. Powell. (Ex. A4 at 59-63.)

6. On April 27, 2005, Ms. Woodbrook entered a guilty plea for the charges of Theft. (Ex. A4 at 16-17.) The court ordered Ms. Woodbrook to pay restitution and placed her on supervised probation. (*Id*. at 52.) On August 2, 2005, the court held a restitution hearing during which it made a judicial finding that Ms. Woodbrook stole $277,000 from Mr. Powell. (*Id*. at 58.)

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[2] The Bank Fraud and Forgery charges were dismissed. (Ex. A4 at 6-27.)

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7. On May 24, 2005, the Louisiana Department of Insurance issued Cease and Desist Order Number 5-9, Summary Suspension Order ("Summary Suspension Order") to Ms. Woodbrook. (Ex. A1.) The Summary Suspension Order includes the following advisement, in part:

> THE LOUISIANA DEPARTMENT OF INSURANCE has obtained documentation indicating the District Attorney for the Parish of Tangipahoa recently filed a Bill of Information against you alleging approximately 50 counts of felony theft (each count in excess of $500.00) arising from your employment with Henry Powell Jr., an insurance producer in Ponchatoula, LA. Additional document reflects that you subsequently pleaded guilty to each of the 50 counts.
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> The Louisiana Insurance Code, Title 22: R.S.22:1 et seq, @ §2 states:
>
> §2. Insurance regulated in the public interest
>
> A.(1) Insurance is an industry affected with the public interest and it is the purpose of this Code to regulate that industry in all its phases… [I]t shall be the duty of the commissioner of insurance to administer the provisions of this Code.
>
> 1142. License denial, nonrenewal, or revocation
>
> A. The commissioner of insurance may place on probation, **suspend, revoke**, or refuse to issue, renew, or reinstate an insurance producer license, or may levy a fine not to exceed five hundred dollars for each violation occurring, up to ten thousand dollars aggregate for all violations in a calendar year per applicant or licensee, or any combination of actions, **for any one or more of the following causes:**
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> (4) Using fraudulent, coercive, or dishonest practices or misrepresentation, or demonstrating incompetence, **untrustworthiness,** or financial irresponsibility in the conduct of business such as might endanger the public.
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> (7) **The conviction or nolo contendere plea to any felony,** participation in a pretrial diversion program pursuant to a felony

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> charge, or conviction of any misdemeanor involving moral turpitude or public corruption.
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> In light of the foregoing, the Louisiana Commissioner of Insurance has determined that the public health, safety or welfare of the citizens of this state would be endangered by your continued involvement in the business of insurance and that the situation imperatively requires that emergency action be taken on the license of **LAURA E. WATKINS, license number 253037.**

(*Id*. at 1-2; emphasis in original.)

The Louisiana Commissioner of Insurance suspended all insurance licenses held by Ms. Woodbrook and ordered her to cease and desist from all activity in the insurance business in Louisiana, effective May 24, 2005. Ms. Woodbrook was served with the Summary Suspension Order on May 24, 2005. (*Id*. at 2-3.)

8. Ms. Woodbrook completed her criminal sentence on October 11, 2005. Pursuant to Louisiana law, she was classified as a first felony offender and received an automatic first offender pardon. The first offender pardon did not restore Ms. Woodbrook "to a state of innocence." (Ex. A4 at 73.) After the resolution of her criminal case in Louisiana, Ms. Woodbrook's attorney discussed the first offender pardon with her. She believed that he informed her that she did not need to report the criminal convictions when applying for jobs. Ms. Woodbrook underwent multiple background checks, which did not show her felony convictions, when subsequently applying for different jobs. As a result, she believed that her criminal convictions had been expunged. (Test. of Woodbrook.)

9. Ms. Woodbrook's suspended Louisiana insurance producer license expired on April 20, 2006. (Ex. R11 at 1.)

10. On March 29, 2022, the Division received an insurance producer license application from Ms. Woodbrook. (Ex. A2.)

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11. On the March 2022 application, Ms. Woodbrook answered, "No," to the following question:

> 1b. Have you ever been convicted of a felony, had a judgment withheld or deferred, or are you currently charged with committing a felony?

(Ex. A2 at 2.) The application included the following explanation:

> **NOTE**: For Questions 1a, 1b, and 1c, **"Convicted"** includes, but is not limited to, having been found guilty by verdict of a judge or jury, having entered a plea of guilty or nolo contendere or no contest, or having been given probation, a suspended sentence, or a fine.

(*Id*.; emphasis in original.)

12. On the March 2022 application, Ms. Woodbrook answered, "No," to the following question:

> 2. Have you ever been named or involved as a party in an administrative proceeding, including FINRA sanction or arbitration proceeding regarding any professional or occupational license or registration?

(Ex. A2 at 2.) The application included the following explanation:

> "Involved" means having a license censured, suspended, revoked, canceled, terminated; or, being assessed a fine, a cease and desist order, a prohibition order, a compliance order, placed on probation, sanctioned or surrendering a license to resolve an administrative action[.]"

(*Id*.)

13. On March 30, 2022, Christine McClellan, Division Compliance Specialist, emailed Ms. Woodbrook to inform her that she "failed to provide complete and accurate information" in her response to question 1b on the insurance producer license application. (Ex. A5 at 5-6.) Ms. McClellan also informed Ms. Woodbrook that the background check

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showed she had felony convictions from 2004 that involved dishonesty or breach of trust and as a result, she would need to complete a "1033 application."[3] (*Id*. at 6.)

14. Ms. Woodbrook failed to submit a 1033 application to the Division. On or about May 26, 2022, the Division determined that her March 2022 application was incomplete. (Ex. A2 at 3-4; test. of Flanagan.)

15. After discussions with Ms. McClellan, Ms. Woodbrook decided to seek an expungement of her convictions. Her employer paid the legal expenses on her behalf. (Test. of Woodbrook; Exs. R4a; R4b; R8.)

16. An Order of Expungement of Arrest/Conviction Record, signed in the 21st Judicial District Court for the Parish of Tangipahoa, State of Louisiana, on September 19, 2022, granted Ms. Woodbrook's Motion for Expungement. Her arrest record for Bank Fraud and Forgery and her felony convictions for Theft were expunged. (Ex. A4 at 1-33.)

17. On September 26, 2022, the Division received a second insurance producer license application ("September 2022 application") from Ms. Woodbrook. (Ex. A3.)

18. On the September 2022 application, Ms. Woodbrook answered, "Yes," to questions 1b and 2.[4] (Ex. A3 at 2.)

19. The Division did not discover the 2005 Louisiana regulatory action against Ms. Woodbrook and/or the existence of the Summary Suspension Order when reviewing the March 2022 application. (Ex. A5 at 9; test. of Flanagan.) The Division typically performs a search for regulatory actions during the application review process, but it did not complete that portion of the review once it discovered that Ms. Woodbrook had disqualifying felony convictions. The Division first discovered the Louisiana regulatory action and Summary Suspension Order when it reviewed her answers on the September 2022 application. (Test. of Flanagan.)

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[3] This is a requirement of 18 USC § 1033.
[4] The questions were the same as those on the March 2022 application. (Exs. A2 at 2; A2 at 2.)

CONCLUSIONS OF LAW

1. Ms. Woodbrook provided incorrect and materially untrue information on her March 2022 application for an Oregon resident insurance producer license.

2. Ms. Woodbrook violated the insurance laws of another state.

3. Ms. Woodbrook used dishonest practices and demonstrated untrustworthiness in the conduct of business in Louisiana.

4. Ms. Woodbrook's insurance producer license was suspended in Louisiana.

5. Ms. Woodbrook's applications for an Oregon resident insurance producer license should be denied pursuant to ORS 744.074(1)(a), (b), (h), and (i).

6. The Director may order Ms. Woodbrook to cease and desist from violating ORS 744.074(1)(a).

7. The Director should assess a civil penalty of $500 against Ms. Woodbrook for violating ORS 744.074(1)(a).

OPINION

The Division contends that Ms. Woodbrook committed acts that are grounds to deny her applications for an insurance producer license and proposes to discipline Ms. Woodbrook by imposing a civil penalty and issuing an order to cease and desist. As the proponent of the allegations, the Division has the burden of establishing by a preponderance of the evidence that the violations occurred and that the proposed sanctions are appropriate. *See* ORS 183.450(2) ("The burden of presenting evidence to support a fact or position in a contested case rests on the proponent of the fact or position"); *Harris v. SAIF*, 292 Or 683, 690 (1982) (general rule regarding allocation of burden of proof is that the burden is on the proponent of the fact or position); *Dixon v. Board of Nursing,* 291 Or App 207, 213 (2018) (the standard of proof that generally applies in agency proceedings is the preponderance standard). Proof by a preponderance of the evidence means that the

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fact finder is persuaded that the facts asserted are more likely true than false. *Riley Hill General Contractor v. Tandy Corp*., 303 Or 390, 402 (1987).

The Oregon Insurance Code is intended to protect "the insurance-buying public" and grants the Director of the Department of Consumer and Business Services the authority to enforce "the provisions of the Insurance Code for the public good[.]" ORS 731.008 and ORS 731.236(1).

ORS 744.074, titled, "Authority of director to place licensee on probation or to suspend, revoke or refuse to issue or renew license," provides, in pertinent part:

> (1) The Director of the Department of Consumer and Business Services may place a licensee on probation or suspend, revoke or refuse to issue or renew an insurance producer license and may take other actions authorized by the Insurance Code in lieu thereof or in addition thereto, for any one or more of the following causes:
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> (a) Providing incorrect, misleading, incomplete or materially untrue information in the license application.
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> (b) Violating any insurance laws, or violating any rule, subpoena or order of the director or of the insurance commissioner of another state or Mexico or Canada.
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> * * * * *
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> (h) Using fraudulent, coercive or dishonest practices, or demonstrating incompetence, untrustworthiness or financial irresponsibility in the conduct of business in this state or elsewhere.
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> (i) Cancellation, revocation, suspension or refusal to renew by any state of a license or other evidence of authority to act as an adjuster or an insurance producer or consultant. The record of the cancellation, revocation, suspension or refusal to renew shall be conclusive evidence of the action taken.

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ORS 744.074(1)(a)

The Division contends that Ms. Woodbrook provided incorrect, misleading, incomplete or materially untrue information on her March 2022 application in violation of ORS 744.074(1)(a) by failing to disclose her theft convictions and the suspension of her Louisiana insurance producer license. In the March 2022 application, Ms. Woodbrook answered, "No," to question 1b: "Have you ever been convicted of a felony, had a judgment withheld or deferred, or are you currently charged with committing a felony?" Additionally, she answered, "No," to question 2: "Have you ever been named or involved as a party in an administrative proceeding, including FINRA sanction or arbitration proceeding regarding any professional or occupational license or registration?" At the time of the March 2022 application, Ms. Woodbrook's felony convictions for theft had not yet been expunged. Furthermore, the Louisiana Department of Insurance's suspended her insurance license in 2005, which qualified as an administrative proceeding regarding a professional or occupational license. Accordingly, her answers to questions 1b and 2 were incorrect and materially untrue.

Ms. Woodbrook contends that her failure to accurately answer questions 1b and 2 were the result of misunderstanding rather than intent. The text of ORS 744.074(1)(a) does not include reference to any mental state. The Oregon Legislature's omission of a mental state in the statute is evidence of its intent to not to require a culpable mental state. *See Topaz v. Oregon Bd. of Examiners for Engineering*, 255 Or App 138 (2013), *rev den*, 353 Or 714 (2013); *Pierce v. Dept. of Public Safety Standards*, 196 Or App 190 (2004). Furthermore, as the court noted in *Pierce*, the legislature often gives agencies the authority to impose sanctions or regulatory consequences (such as the denial of licensure) based simply on false statements in an application, as opposed to statements made knowingly, intentionally, deliberately or with any other specified mental state. *Pierce*, 196 Or App at 195. An applicant, such as Ms. Woodbrook, can violate ORS 744.074(1)(a) by

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unintentionally or mistakenly providing incorrect or materially untrue information on an insurance producer license application. Accordingly, the Division established that it may refuse to issue an insurance producer license to Ms. Woodbrook pursuant to ORS 744.074(1)(a).

ORS 744.074(1)(b)

The Division also proposes to deny Ms. Woodbrook's license applications pursuant to ORS 744.074(1)(b) because she violated the insurance laws of another state. In the Summary Suspension Order, the Louisiana Department of Insurance imposed sanctions on Ms. Woodbrook for violating two provisions of the Louisiana Insurance Code, Title 22: R.S.22:1142(A)(4) and (7). Exhibit A1 at 1-2. Accordingly, the Division established that it may refuse to issue an insurance producer license to Ms. Woodbrook pursuant to ORS 744.074(1)(b).

ORS 744.074(1)(h)

The Division further contends that Ms. Woodbrook's license applications should be denied pursuant to ORS 744.074(1)(h) because she used dishonest practices, demonstrated incompetence, untrustworthiness, or financial irresponsibility in the conduct of business in Louisiana by misappropriating or taking property belonging to her employer, Mr. Powell. Although Ms. Woodbrook's now expunged convictions cannot be used as a basis to deny her license application, the underlying conduct related to her employment in the insurance industry may be considered. *See Leong's, Inc. v. Oregon State Lottery Commission*, 142 Or App 460, 467 (1996) (finding that the Commission could deny petitioner's application based on conduct underlying an "expunged" conviction because the Commission did not surreptitiously obtain information concerning the conduct from sealed official records.)

At the hearing, Ms. Woodbrook contended that she took money only from Mr. Powell's personal checking account and that her actions did not harm any insurance

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customers. To the extent that she is arguing that her conduct was unrelated to the conduct of business, her argument is unpersuasive. The Louisiana Department of Insurance found that the theft arose from her employment with Mr. Powell. Furthermore, in her position as Mr. Powell's office manager, her duties included paying bills and commissions from that account. Although she and Mr. Powell were also engaged in a personal relationship for a significant period of her employment, ALJ Jarry found that more likely than not, Ms. Woodbrook took the money from Mr. Powell's bank account while acting as the office manager. The taking or misappropriation of money from her employer was related to the conduct of business regardless of whether her actions affected insurance customers.

The Division established that Ms. Woodbrook used dishonest practices and demonstrated untrustworthiness in the conduct of business in Louisiana by misappropriating money from her employer in the insurance industry. Accordingly, the Division established that it may refuse to issue an insurance producer license to Ms. Woodbrook pursuant to ORS 744.074(1)(h).

ORS 744.074(1)(i)

Finally, the Division proposes to deny Ms. Woodbrook's license applications pursuant to ORS 744.074(1)(i) because her insurance producer license was suspended in Louisiana. In the Summary Suspension Order, the Louisiana Commissioner of Insurance suspended all insurance licenses held by Ms. Woodbrook and ordered her to cease and desist from all activity in the insurance business, effective May 24, 2005. The Summary Suspension Order is conclusive evidence of the action taken. *See* ORS 744.074(1)(i). Accordingly, the Division established that it may refuse to issue an insurance producer license to Ms. Woodbrook pursuant to ORS 744.074(1)(i).

License Application Denial

As previously discussed, the Division established four separate grounds under ORS 744.074(1) for refusing to issue an insurance producer license to Ms. Woodbrook:

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providing inaccurate and materially untrue information on her March 2022 application; violating the insurance laws in Louisiana; demonstrating untrustworthiness in the conduct of business in Louisiana; and the suspension of her insurance producer license in Louisiana.

Ms. Woodbrook contends that she should be given a "second chance" in the insurance industry based on changes she has made in her life and the amount of time that has passed since she engaged in the conduct underlying her now expunged criminal convictions and license suspension in Louisiana.[5] *See* Woodbrook Closing Argument. Although substantial time has passed since the underlying conduct and license suspension occurred, the conduct was serious in nature. The purpose of the Insurance Code is to protect "the insurance-buying public." ORS 731.008. Ms. Woodbrook's theft of $277,000 from her employer occurred over the course of multiple years and raises significant concerns regarding her present ability to conform her conduct to requirements of the Insurance Code. Although Ms. Woodbrook appears to have made improvements in her life since 2005 (when her Louisiana insurance producer license was suspended and she completed her criminal sentence), she more recently failed to provide accurate information on her March 2022 application regarding her criminal history and Louisiana license suspension. In light of the multiple violations, the serious nature of the underlying conduct, and the more recent grounds for denial, the Division's determination to deny Ms. Woodbrook's license applications is reasonable and well within the bounds of agency discretion.

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[5] Ms. Woodbrook also contends that the Division misled her regarding her eligibility for an insurance producer license if she obtained an expungement of her convictions. The Division did not base its denial of her license applications on ORS 744.074(1)(f), which provides that the Director may refuse to issue an insurance producer license for "[h]aving been convicted of a felony * * *." While it is unfortunate that Ms. Woodbrook's employer incurred the legal expense, the expungement of her felony convictions does not negate any other grounds under ORS 744.074(1) the Division found for denying the license applications.

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Cease and Desist

Pursuant to ORS 731.252(1), if the Director "has reason to believe that any person has been engaged or is engaging or is about to engage in any violation of the Insurance Code, the director may issue an order, directed to such person, to discontinue or desist from such violation or threatened violation." In this case, the evidence demonstrates that the Director has reason to believe that Ms. Woodbrook violated ORS 744.074(1)(a). Accordingly, the Director is authorized to order Ms. Woodbrook to cease and desist from violating ORS 744.074(1)(a).

Civil Penalty

ORS 731.988(1) provides:

> A person that violates any provision of the Insurance Code, any lawful rule or final order of the Director of the Department of Consumer and Business Services or any judgment that a court makes in response to the director's application, shall forfeit and pay to the General Fund of the State Treasury a civil penalty in an amount determined by the director that does not exceed $10,000 for each offense. The civil penalty for individual insurance producers, adjusters or insurance consultants may not exceed $1,000 for each offense. Each violation is a separate offense.

The Division proposes to assess a civil penalty of $500 for Ms. Woodbrook's violation of ORS 744.074(1)(a). The amount of the proposed civil penalty is less than the maximum allowable amount under ORS 731.988(1) and is reasonable given Ms. Woodbrook's provision of incorrect and materially untrue information in response to two questions on the March 2022 application. Those responses impeded the Director's ability to properly assess her qualifications for a resident insurance producer license. *See* ORS 744.059(1). Accordingly, the Division's proposed imposition of a $500 civil penalty on Ms. Woodbrook for her violation of ORS 744.074(1)(a) is reasonable and appropriate.

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ORDER

Now, therefore, the Director issues the following Orders:

1. Pursuant to ORS 744.074(1)(a), (b), (h), and (i), Lauren E. Woodbrook's applications for a resident insurance producer license are denied.

2. Pursuant to ORS 731.252(1), Lauren E. Woodbrook shall cease and desist from violating ORS 744.074(1)(a).

3. Pursuant ORS 731.988(1), Lauren E. Woodbrook is assessed a civil penalty of $500 for violating ORS 744.074(1)(a).

SO ORDERED this 12th day of March, 2024.

Andrew R. Stolfi, Director
Department of Consumer and Business Services

/s/ Dorothy Bean
Dorothy Bean, Chief of Enforcement
Division of Financial Regulation

NOTICE OF RIGHT TO JUDICIAL APPEAL

You are entitled to judicial review of this order in accordance with ORS 183.482. You may request judicial review by filing a petition with the Court of Appeals in Salem, Oregon, within 60 days from the date this order is served.

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