BEFORE THE STATE BOARD OF EMBALMERS AND FUNERAL DIRECTORS
STATE OF MISSOURI

ORDER ISSUING PROBATED PROVIDER LICENSE TO

OFFICER MORTUARY LLC

The State Board of Embalmers and Funeral Directors (the "Board") and pursuant to Section 324.038, RSMo[1], issues this order granting a **PROBATED PROVIDER LICENSE** to **OFFICER MORTUARY LLC** ("Officer Mortuary" or "Licensee") located at 1905 N. Union Blvd., St. Louis, Missouri 63113.

As set forth in Section 324.038, RSMo, Licensee may submit a written request for hearing to the Administrative Hearing Commission seeking review of the Board's decision set forth in this Order. Such written request must be filed with the Administrative Hearing Commission within 30 days of the date the Board mails this Order to Licensee. The written request should be addressed to the Administrative Hearing Commission, Room 640, Truman State Office Building, P.O. Box 1557, Jefferson City, Missouri 65102-1557. Any such request should set forth that the applicant is qualified for nonprobated licensure pursuant to the laws and administrative regulations relating to Licensee's profession. If such review is requested, a hearing shall be held pursuant to Chapter 621, RSMo. A Commissioner of the Administrative Hearing Commission will preside over the hearing. The hearing will be on the record and recorded by a court reporter. At the hearing, Licensee shall have the right to present testimony, call witnesses on its behalf, introduce evidence, cross-examine any witnesses called by the Board, and object to any evidence introduced by the Board and make legal argument to the

[1] All statutory references are to the Revised Statutes of Missouri (2000), as supplemented, unless otherwise indicated.

Commission. Following the hearing, the Administrative Hearing Commission will issue an order including findings of fact, conclusions of law and a decision based on the evidence admitted at the hearing. A copy of the Administrative Hearing Commission's order will be delivered to the parties. Chapter 536, RSMo, sets forth the procedures for review of the order of the Administrative Hearing Commission.

If no written request for review is filed with the Administrative Hearing Commission within the 30-day period, the right to seek review of the Board's decision shall be considered waived. Section 324.038.2, RSMo. Should Licensee make written request for review of this Order, the terms and conditions of this Order shall remain in full force and effect unless and until such time as the Administrative Hearing Commission or reviewing court orders otherwise.

Relevant Statutes and Regulations

1. Section 324.038, RSMo, authorizes the Board to issue a license subject to probation in lieu of denial and states:

> 1. Whenever a board within or assigned to the division of professional registration, including the division itself when so empowered, may refuse to issue a license for reasons which also serve as a basis for filing a complaint with the administrative hearing commission seeking disciplinary action against a holder of a license, the board, as an alternative to refusing to issue a license, may, at its discretion, issue to an applicant a license subject to probation.
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> 2. The board shall notify the applicant in writing of the terms of the probation imposed, the basis therefor, and the date such action shall become effective. The notice shall also advise the applicant of the right to a hearing before the administrative hearing commission, if the applicant files a complaint with the administrative hearing commission within thirty days of the date of delivery or mailing by certified mail of written notice of the probation. If the board issues a probated license, the applicant may file, within thirty days of the date of delivery or mailing by certified mail of written notice of the probation, a written complaint with the administrative hearing commission seeking review of the board's determination. Such complaint shall set forth that the applicant or licensee is

qualified for nonprobated licensure pursuant to the laws and administrative regulations relating to his or her profession. Upon receipt of such complaint the administrative hearing commission shall cause a copy of such complaint to be served upon the board by certified mail or by delivery of such copy to the office of the board, together with a notice of the place of and the date upon which the hearing on such complaint will be held. Hearings shall be held pursuant to chapter 621. The burden shall be on the board to demonstrate the existence of the basis for imposing probation on the licensee. If no written request for a hearing is received by the administrative hearing commission within the thirty-day period, the right to seek review of the board's decision shall be considered waived.

3. If the probation imposed includes restrictions or limitations on the scope of practice, the license issued shall plainly state such restriction or limitation. When such restriction or limitation is removed, a new license shall be issued.

2. Section 333.315, RSMo, requires a license to operate as a provider of preneed contracts and sets forth the requirements for licensure and states:

1. No person shall be designated as a provider or agree to perform the obligations of a provider under a preneed contract unless, at the time of such agreement or designation, such person is licensed as a preneed provider by the board. Nothing in this section shall exempt any person from meeting the licensure requirements for a funeral establishment as provided in this chapter. 2. An applicant for a preneed provider license shall:

(1) File an application on a form established by the board and pay an application fee in an amount established by the board by rule;

(2) Be authorized and registered with the Missouri secretary of state to conduct business in Missouri;

(3) Identify the name and address of a custodian of records responsible for maintaining the books and records of the provider relating to preneed contracts;

(4) Identify the name and address of each seller authorized by the provider to sell preneed contracts in which the provider is designated or obligated as the provider;

(5) File with the state board a written consent authorizing the state board to inspect or order an investigation, examination, or audit of the provider's books and records which contain information concerning preneed

contracts sold for or on behalf of a seller or in which the applicant is named as a provider; and

(6) If the applicant is a corporation, each officer, director, manager, or controlling shareholder shall be eligible for licensure if they were applying for licensure as an individual.

3. Each preneed provider shall apply to renew his or her license on or before October thirty-first of each year or a date established by the division of professional registration pursuant to section 324.001. A license which has not been renewed prior to the renewal date shall expire. Applicants for renewal shall:

(1) File an application for renewal on a form established by the board by rule;

(2) Pay a renewal fee in an amount established by the board by rule, however no renewal fee shall be required for any funeral establishment whose Missouri license is current and active;

(3) Be authorized and registered with the Missouri secretary of state to conduct business in Missouri;

(4) File an annual report with the state board which shall contain:

(a) The name and address of a custodian of records responsible for maintaining the books and records of the provider relating to preneed contracts;

(b) The business name or names used by the provider and all addresses from which it engages in the practice of its business;

(c) The name and address of each seller with whom it has entered into a written agreement since last filing an annual report with the board authorizing the seller to designate or obligate the licensee as the provider in a preneed contract; and

(d) Any information required by any other applicable statute or regulation enacted pursuant to state or federal law.

4. A license which has not been renewed as provided by this section shall expire. A licensee who fails to apply for renewal may apply for reinstatement within two years of the renewal date by satisfying the requirements of subsection 3 of this section and paying a delinquent fee as established by the board by rule.

3. Section 333.320, RSMo, requires a license to be a seller and states:

1. No person shall sell, perform, or agree to perform the seller's obligations under, or be designated as the seller of, any preneed contract unless, at the time of the sale, performance, agreement, or designation, such person is licensed by the board as a seller and authorized and registered with the Missouri secretary of state to conduct business in Missouri.

4. Section 333.061, RSMo, requires a license to operate as a funeral establishment in Missouri and states:

1. No funeral establishment shall be operated in this state unless the owner or operator thereof has a license issued by the board.

2. A license for the operation of a funeral establishment shall be issued by the board, if the board finds:

(1) That the establishment is under the general management and the supervision of a duly licensed funeral director;

(2) That all embalming performed therein is performed by or under the direct supervision of a duly licensed embalmer;

(3) That any place in the funeral establishment where embalming is conducted contains a preparation room with a sanitary floor, walls and ceiling, and adequate sanitary drainage and disposal facilities including running water, and complies with the sanitary standard prescribed by the department of health and senior services for the prevention of the spread of contagious, infectious or communicable diseases;

(4) Each funeral establishment shall have available in the preparation or embalming room a register book or log which shall be available at all times in full view for the board's inspector and the name of each body embalmed, place, if other than at the establishment, the date and time that the embalming took place, the name and signature of the embalmer and the embalmer's license number shall be noted in the book; and

(5) The establishment complies with all applicable state, county or municipal zoning ordinances and regulations.

3. The board shall grant or deny each application for a license pursuant to this section within thirty days after it is filed. The applicant may request in writing up to two thirty-day extensions of the application, provided the request for an extension is received by the board prior to the expiration of the thirty-day application or extension period.

4. Licenses shall be issued pursuant to this section upon application and the payment of a funeral establishment fee and shall be renewed at the end of the licensing period on the establishment's renewal date.

5. Section 333.330, RSMo, authorizes the Board to deny an application for a provider license and states, in relevant portion:

> 1. The board may refuse to issue any certificate of registration or authority, permit, or license required under this chapter for one or any combination of causes stated in subsection 2 of this section. The board shall notify the applicant in writing of the reasons for the refusal and shall advise the applicant of his or her right to file a complaint with the administrative hearing commission as provided by chapter 621.
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> 2. The board may cause a complaint to be filed with the administrative hearing commission as provided by chapter 621 against any holder of any certificate of registration or authority, permit, or license required by this chapter, or any person who has failed to renew or has surrendered his or her certificate of registration or authority, permit, or license for any one or any combination of the following causes:
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> (4) Obtaining or attempting to obtain any fee, charge, tuition, or other compensation by fraud, deception, or misrepresentation;
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> (5) Incompetency, misconduct, gross negligence, fraud, misrepresentation, or dishonesty in the performance of the functions or duties of any profession licensed or regulated by this chapter;
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> (6) Violation of, or assisting or enabling any person to violate, any provision of this chapter, or of any lawful rule or regulation adopted pursuant thereto;
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> (7) Impersonation of any person holding a certificate of registration or authority, permit, or license or allowing any person to use his or her certificate of registration or authority, permit, license, or diploma from any school;
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(11) Assisting or enabling any person to practice or offer to practice any profession licensed or regulated by this chapter regulating preneed who is not licensed or registered and currently eligible to practice thereunder;

* * *

(14) Violation of any professional trust or confidence;

6. Relevant portions of 20 CSR 2120-2.070 state as follows:

(9) The establishment license issued by the board is effective for a fixed place or establishment and for a specific name of a person or entity authorized to conduct business in Missouri and may include one (1) "doing business as" name. The license issued by the board shall be displayed in a conspicuous location accessible to the general public at that location. Whenever the ownership, location, or name of the Missouri licensed establishment is changed, a new license shall be obtained. If the Missouri licensed funeral establishment maintains a chapel, preparation room, or other facility in a building or portion physically separated from and located at a place designated by an address differing from the office, chapel, or other facilities of the applicant, the chapel, preparation room, or other funeral facility otherwise located shall be deemed to be a separate funeral establishment. Nothing contained in this rule shall be construed or interpreted to require a separate registration for a building if it is joined or connected by a private passage, walk or driveway existing between the registered establishment and the other building.

(A) If a change of ownership is caused by the elimination of one (1) or more owners, for whatever reason (death, sale of interest, divorce, etc.) without the addition of any new owner(s), it is not necessary to obtain a new establishment license. However, a new application for an establishment license form shall be filed as an amended application within thirty (30) days after the change of ownership. This form shall be filled out completely with correct, current information.

(B) A corporation is considered by law to be a separate person. If a corporation owns a Missouri licensed funeral establishment, it is not necessary to obtain a new establishment license or to file an amended application for an establishment license if the owners of the stock change. However, as a separate person, if a corporation begins ownership of a Missouri licensed funeral establishment or ceases ownership of a Missouri licensed funeral establishment, a new establishment license shall be obtained regardless of the relationship of the previous or subsequent owner to the corporation.

(10) The professional business and practice of funeral directing shall be conducted only from a fixed place or establishment that has been licensed by the board except as permitted by section 333.071, RSMo. The Missouri licensed

funeral establishment physical facility shall be under the general management and supervision of the Missouri licensed funeral director-in-charge. Every Missouri licensed funeral establishment shall provide and allow access to any member or duly authorized agent of the board for the purpose of inspection as provided by sections 333.061 and 333.101, RSMo. If any representative of the Missouri licensed funeral establishment fails or refuses to provide or allow access, it shall be considered a violation of this rule by the Missouri licensed funeral establishment and by the Missouri licensed funeral director-in-charge of the Missouri licensed funeral establishment. Additionally, if the Missouri licensed funeral establishment representative who fails or refuses to provide or allow access holds any license or registration issued by this board, that person shall be in violation of this rule.

(11) No one licensed by this board may be employed in any capacity by an unlicensed funeral establishment. Violation of this section will be deemed misconduct in the practice of embalming or funeral directing.

(12) Only one (1) license will be issued by this board for any physical facility that is considered to be a Missouri licensed funeral establishment as defined by statute and rule. If a Missouri funeral establishment licensed by this board is destroyed by fire or some other disaster or act of God, the board, in its discretion, for a period of not more than six (6) months, may allow the Missouri licensed funeral establishment to continue its operation from another Missouri licensed funeral establishment or from a facility that has not been licensed as a funeral establishment if the facility meets the minimum requirements for the functions outlined in section (2) of this rule.

(13) A Missouri licensed funeral establishment may use only its registered name in any advertisement or holding out to the public.

(A) All signs, stationery and any advertising in newspapers, publications or otherwise, shall include the name(s) of the Missouri licensed funeral establishment registered with the board. Advertisements that do not comply with this section shall be deemed misleading for the purposes of section 333.121, RSMo.

(B) It shall not be deemed to be misleading if a listing appears in a telephone directory or national directory if the name of the Missouri licensed funeral establishment changes after the listing has been placed, but before a new directory is published.

Parties and Application for Licensure

7. The Board is an agency of the State of Missouri created and established pursuant to Section 333.151, RSMo, and vested with the authority to execute and enforce the provisions of Chapter 333 and portions of Chapter 436, RSMo.

8. Officer Mortuary, LLC is a Missouri limited liability company in good standing with its principal place of business at 1905 Union Boulevard, St. Louis, Missouri 63113.

9. Officer Mortuary signed on December 6, 2010 its "Provider Application" (the "Application") and the Board received the Application on December 7, 2010[2]. Marion E. Officer, Jr. signed the Application on behalf of Officer Mortuary. The Application was not completed until December 1, 2011 when Officer Mortuary completed their Application by meeting all requirements for the Board to consider it for licensure.

10. The Application listed Marion E. Officer, Jr. as the sole officer, director, manager, shareholder or owner of Officer Mortuary.

Basis for Probation

Operating Without an Establishment License

11. The Board conducted an investigation to determine whether Officer Mortuary operated as a funeral establishment without a funeral establishment license.

12. On August 11, 2011, the Board's investigator visited the location of Officer Mortuary and found the following violations:

a. The funeral home was open for business;

b. No funeral establishment license was posted;

[2] Officer Mortuary provided the Board with its application for funeral establishment, seller and provider in the same packet with the same accompanying documents to be used for each application

c. Mr. Officer was present and informed the Board that the funeral home was operating under a license issued to Officer Mortuary, Inc., a business that had been operated at that location by his sister, but provided the Board with no documentation so show a valid funeral establishment license;

d. A body was present in the preparation room that was being prepared for final disposition;

e. The register book in the preparation room showed the first entry to reflect a body was embalmed on December 15, 2010 and the 2011 register book contained 44 entries with the first dated January 1, 2011 and the last dated August 16, 2011. The log appeared to be missing 9 entries when compared against the written statements of goods and services provided to the Board's investigators;

f. Records from the City of St. Louis indicated that the business had closed on June 15, 2011 and no new city business license had issued;

g. Officer Mortuary produced no valid city business license;

h. Officer Mortuary, in correspondence with the Board and others, used letterhead in at least August and September, 2011, with the name of "Officer Mortuary, L.L.C. Ellis Chapel" that listed the officers of the company and the "professional services manager" including Marion E. Officer, Jr. as president;

i. The business card of the funeral director in charge listed the business as "Officer Mortuary L.L.C. Ellis Chapel";

j. Officer Mortuary provided funeral service brochures to families and those in attendance at funeral services listed "Services Entrusted to: Officer Mortuary, LLC Ellis Chapel" on at least 4 occasions;

k. The written statements of goods and services provided to families for goods and services provided to families showed the name of the business to be "Officer Mortuary, L.L.C." and listed Marion E. Officer, Jr. as President.

l. Officer Mortuary provided 46 funeral services to families, as evidenced by the written statements of goods and services for persons who died between December 13, 2010 and August 27, 2011.

m. Between the dates of November 10, 2010 and September 8, 2011, Officer Mortuary submitted 46 death certificates to the Division of Vital Records using the name of Officer Funeral Home, Inc.

13. On September 29, 2011, Officer Mortuary appeared, by its attorney and Marion E. Officer, Jr., before the Board to respond to inquiries of the Board regarding its unlicensed practice and the pending applications for licensure.

14. The location at which Officer Mortuary seeks licensure, 1905 N. Union Blvd., St. Louis, Missouri 63113, had previously been a licensed funeral establishment operated by Officer Funeral Home, Inc.

15. On November 29, 2010, the Board received notice from Officer Funeral Home, Inc. that it would be ceasing business and would no longer operate a funeral establishment at 1905 N. Union Blvd, St. Louis, Missouri. Officer Funeral Home, Inc. subsequently notified the Board that its funeral establishment ceased operation on November 18, 2010.

16. Between November 19, 2010 and until approximately September 20, 2011, Officer Mortuary operated as a funeral establishment at 1905 North Union Boulevard, St. Louis, Missouri when it had no valid funeral establishment license.

17. Officer Mortuary held out to the public that it was a duly licensed funeral establishment when it held no such license.

18. Officer Mortuary provided services for at least 46 decedents during the time when it was not licensed.

19. Officer Mortuary filed documents with the State of Missouri, Department of Health and Senior Services, Division of Vital Records holding out as Officer Funeral Home, Inc. when it had no such authority to do so and when, in fact, Officer Mortuary provided the final disposition services and not Officer Funeral Home, Inc.

Acting as Provider Without a License

20. Officer Mortuary provided the Board with 2 preneed funeral contracts listing Officer Funeral as the Provider – one contract was issued on July 13, 2011 to T.D. with a face value of $5,335 and one contract was issued on July 5, 2011 to M.C. with a face value of $700.60.

21. On the contract for T.D., sold to the consumer by an employee of Officer Mortuary, Marion E. Officer, Jr., signed on behalf of Officer Mortuary acknowledging it would serve as the provider for life insurance funded preneed contract.

22. On the contract for M.C., Officer Mortuary is listed as the provider and the contract was sold to the consumer by an employer of Officer Mortuary.

23. Officer Mortuary acted as a provider when it held no such license.

Disclosure of Discipline

24. On the Application, Officer Mortuary checked the "yes" box in response to the following question:

3. Have you ever had any professional license, certification, registration or permit revoked, suspended, placed on probation, censured, reprimanded, fined or otherwise subjected to any type of disciplinary action? If yes, attach a full explanation.

25. In explanation for the "yes" answer on the Application, Marion E. Officer, Jr. ("Mr. Officer") provided the Board with a letter of explanation.

26. Mr. Officer disclosed in his letter attached to his Application: "In late 1989 the Officer Funeral Home of East St. Louis Illinois was reprimanded for the mishandling of a deceased human infant remains."

Discipline on License by State of Illinois

27. Records obtained from the Illinois Department of Financial and Professional Regulation show the following discipline on Mr. Officer's Illinois funeral director and embalmer license:

a. On March 3, 1992, The State of Illinois Department of Professional Regulation ("State of Illinois") entered into a consent order with Mr. Officer placing his funeral director and embalmer license on probation for a period of one year and imposing a $5,000 fine in settlement of allegations that Mr. Officer received dead human remains in November, 1988, but the requested cremation was not performed and the embalmed dead human remains were found abandoned at the former site of a funeral home operated by Mr. Officer.

b. On August 24, 2004, the State of Illinois and Mr. Officer entered into a Consent Order reprimanding the embalmer and funeral director license held by Mr. Officer and imposing a $100 fine in settlement of allegations that Mr. Officer's office manager falsified three funeral claim forms in the amount of $2,000.

c. On March 26, 2010, the State of Illinois and Mr. Officer entered into a consent order (the "2010 Consent Order") in settlement of allegations of misconduct including providing substandard funeral services and agreeing to refund monies to consumers, but not honoring his commitment to do so. The 2010 Consent Order included orders that Mr. Officer's funeral director and embalmer license be indefinitely suspended for a period of six months; a fine of $5,000 be imposed; Mr. Officer must complete continuing education coursework of 6 credit hours on regulations dealing with funeral directing and embalming and 6 credit hours of expanding funeral ethics; correct a death certificate to show burial instead of cremation; that Mr. Officer issue refunds totaling $5,500 to two families; and provide to the State of Illinois a written business plan containing protocols for submitting accurate insurance forms and authorizations, maintaining correct records and providing funeral services as requested. The 2010 Consent Order also stated that if a petition for restoration of license was granted, the license would be on probation.

d. On March 28, 2011, the State of Illinois issued a "Suspension Order" due to unpaid tax liability or failure to file tax returns and suspended Mr. Officer's funeral director and embalmer license.

28. Mr. Officer's funeral director and embalmer license remains suspended in Illinois.

Statutory Basis for Denial

29. Officer Mortuary's conduct provides basis for the Board to deny its Application pursuant to cause set forth in Sections 333.330.2(4), (5), (6), (7), (11), and (14), RSMo.

30. The Board finds that issuance of a probated provider license, subject to certain terms and conditions, in lieu of denial, will ensure protection of the public.

Issuance of Probated License Subject to Terms and Conditions

The Board, in lieu of denial, hereby issues a provider license to Officer Mortuary, LLC, located at 1905 North Union Boulevard, St. Louis, Missouri 63113, on **PROBATION** for a period of **FIVE YEARS** (the "Disciplinary Period") subject to the terms and conditions contained in this Order and set forth below.

Terms and Conditions of Probation

31. Licensee shall comply with the following terms and conditions of probation during the Disciplinary Period:

a. Licensee shall keep the Board informed of Licensee's current telephone numbers and addresses. Licensee shall notify the Board in writing within ten (10) business days of any change in this information. If Licensee utilizes e-mail, Licensee shall provide the Board with its current and active e-mail address;

b. Licensee shall comply with all applicable provisions of Chapters 194, 333 and 436, RSMo, all Board regulations and all federal, state and local laws and regulations related to business operations in the funeral and death care industry including all insurance and security laws applicable to any insurance or annuity used to fund preneed funeral contracts;

c. Licensee shall engage in no conduct that would give the Board cause to seek authority to discipline from the Administrative Hearing Commission;

d. Licensee shall meet in person with the Board or any Board representative at any such time and place as required by the Board or its representative upon reasonable notice. Any such meetings shall be at the Board's discretion;

e. Licensee shall submit written compliance reports to the Board no later than January 1 and July 1 of each year, but no compliance report shall be filed more than 14 days before it is due. Each of these compliance reports shall state truthfully whether there has been full compliance with the terms and conditions of this Order for the previous six month period and shall fully explain any non-compliance. These compliance reports shall contain all other information required by this Order. Compliance reports may be submitted on a form provided by the Board, but failure to receive such a form from the Board shall not excuse the timely filing of any compliance report;

f. Upon the request by the Board or its representative, Licensee shall immediately submit any and all records requested to show compliance with these terms and conditions;

g. Licensee shall renew timely all licenses and/or registrations, shall pay timely all fees required for licensure/registration and shall meet all other requirements necessary to maintain all licenses and registrations issued by the Board current and active; and

h. Licensee shall accept and cooperate with unannounced visits from the Board, or its representatives, to monitor compliance with the terms and conditions of probation; and

i. Licensee shall designate a manager in charge and shall notify the Board within 10 days of the date of this Order as to the name, address, phone and e-mail (if applicable) of the manager in charge of the provider. Licensee shall provide the Board with written notice of any change of the manager in charge no later than 5 days after the change occurs. Marion E. Officer, Jr. shall not serve as the manager in charge without the written consent of the Board.

32. Upon the expiration of the Disciplinary Period and successful completion of the probation, Licensee's license shall be fully restored if all other requirements of the law have been satisfied; provided however, that in the event the Board determines that Licensee has violated any term or condition of this Order, the Board may, in its discretion, after an evidentiary hearing, vacate and set aside the discipline imposed herein and may suspend, revoke, or otherwise lawfully discipline Licensee's license.

33. The Board shall enter no order imposing further discipline on Licensee's license without notice and an opportunity for hearing before the Board in accordance with the provisions of Chapter 536, RSMo.

34. If the Board determines that Licensee has violated a term or condition of this Order, and that violation would also be actionable in a proceeding before the Administrative Hearing Commission or in a circuit court, the Board may elect to pursue any lawful remedies or procedures afforded to it and is not bound by this Order in its determination of appropriate legal actions concerning such violation(s).

35. If any alleged violation of this Order occurs during the Disciplinary Period, the Board may choose to conduct a hearing on the alleged violation either during the Disciplinary Period, or as soon thereafter as a hearing can be held, to determine whether a violation of the

terms and conditions of probation occurred and, if so, may impose further discipline on the provider license of Licensee. The Board has continuing jurisdiction to hold a hearing determine if a violation of the terms and conditions of probation occurred.

36. This Order of the Board shall be maintained as an open and public record of the Board as provided in Chapters 333, 610 and 324, RSMo.

IT IS SO ORDERED.

Dated: 12.13.11

Sandy Sebastian

Sandy Sebastian
Executive Director
State Board of Embalmers and Funeral Directors