

IN THE CIRCUIT COURT OF THE SECOND JUDICIAL CIRCUIT
IN AND FOR LEON COUNTY, STATE OF FLORIDA

Florida Department of Financial Services,
Division of Insurance Agent & Agency
Services

Plaintiff,

vs.

Case No.: 2019 CA 002792

Contender Claims Consultants,
Guillermo Saavedra, Nicola Faride Grados,
Miguel Angel Grados, Strems Law Firm,
Marin, Eljaiek, Lopez & Martinez, P.L., and
Pardo Law Firm

Respondents.

PETITION TO ENFORCE A STATE AGENCY INVESTIGATIVE SUBPOENA

The Florida Department of Financial Services, Division of Insurance Agent & Agency Services (“Department”) seeks an order pursuant to section 624.321(2), Florida Statutes,¹ directing Respondents to comply with several Department subpoenas for records related to a Department investigation of possible violations of the Florida Insurance Code,² specifically chapters 624 and 626, Florida Statutes.

I. JURISDICION AND VENUE

1. Section 626.112(1)(a), Florida Statutes, provides in relevant part, that “no person may be, act as, or advertise or hold himself or herself out to be an... insurance adjuster... unless he or she is currently licensed by the Department and appointed by an appropriate appointing entity or person.”

¹ Unless otherwise indicated, all statutory references are to the 2019 edition of the Florida Statutes.

² Chapters 624 through 632, 634, 635, 636, 641, 642, 648, and 651, Florida Statutes, constitute the “Florida Insurance Code.” See § 624.01, Fla. Stat.

2. Section 626.854(1) defines a public adjuster as:

any person, except a duly licensed attorney at law as exempted under s. 626.860, who, for money, commission, or any other thing of value, directly or indirectly prepares, completes, or files an insurance claim for an insured or third-party claimant or who, for money, commission, or any other thing of value, acts on behalf of, or aids an insured or third-party claimant in negotiating for or effecting the settlement of a claim or claims for loss or damage covered by an insurance contract [or] any person who, for money, commission, or any other thing of value, directly or indirectly solicits, investigates, or adjusts such claims on behalf of a public adjuster, an insured, or a third-party claimant.

3. The regulation of insurance adjusters falls under Parts I and VI of chapter 626, Florida Statutes. §§ 626.011-626.711 and 626.851-626.8797, Fla. Stat.

4. At all times material hereto, Respondent Guillermo Saavedra was licensed with the Department as a public adjuster-all lines (3-20) with a business address located at 2600 South Douglass Road, Suite 1004, Coral Gables, Florida 33134. [Exhibit 1]

5. Respondent Nicola Grados has been licensed as an all lines adjuster (6-20) since August 8, 2018, with a home and business address at 8315 NW 51st Manor. [Exhibit 2]

6. Respondent Miguel Grados has been licensed as an all lines adjuster (6-20) since August 14, 2018, with a home and business address at 8315 NW 51st Manor. [Exhibit 3]

7. Pursuant to Section 626.8695(1), Florida Statutes, each business location established by an adjuster, an adjusting firm, a corporation, or an association must designate a primary adjuster with the Department, who is licensed and appointed to adjust the insurance claims adjusted by the business location.

8. At all times material hereto, Mr. Saavedra was the primary adjuster on file with the Department for Contender Claims Consultants, Inc. (Contender Claims) located at 2600 South Douglass Road, Suite 1004, Coral Gables, Florida 33134. [Exhibit 4]

9. At all times material hereto, the Florida Division of Corporations lists Mr. Saavedra as the president and sole officer of Contender Claims.

10. Pursuant to section 626.561(2), Florida Statutes, Mr. Saavedra, Nicola Grados, and Miguel Grados, as licensees, are required to keep and make available to the Department or Office³ books, accounts, and records as will enable the Department or Office to determine whether such licensee is complying with the provisions of the Florida Insurance code.

11. Mr. Saavedra, Nicola Grados, and Miguel Grados, as licensed adjusters, must also comply with the requirements of section 626.875, Florida Statutes, which states, “Each appointed independent adjuster and licensed public adjuster must maintain a place of business in this state which is accessible to the public and keep therein the usual and customary records pertaining to transactions under the license.”

12. Pursuant to section 626.875(2), Florida Statutes, Mr. Saavedra, Nicola Grados, and Miguel Grados must keep adjusting records related to any particular claim or loss at their place of business for at least 5 years after completion of the adjustment.

13. Pursuant to section 624.317, Florida Statutes, if the Department has reason to believe that any person has violated or is violating any provision of the Florida Insurance Code, or upon the written complaint signed by any interested person indicating that any such violation may exist, the Department shall conduct an investigation as it deems necessary of the accounts, records, documents, and transactions pertaining to or affecting the insurance affairs of any general agent, surplus lines agent, adjuster, managing general agent, insurance agent, insurance agency, customer representative, service representative, or other person subject to its jurisdiction, subject to the requirements of section 626.601, Florida Statutes.

³ “Office” means the Office of Insurance Regulation, a separate and distinct Florida insurance regulatory agency.

14. Pursuant to section 624.307(3), Florida Statutes, the Department is authorized to conduct investigations of insurance matters, in addition to investigations expressly authorized, such as those investigations in section 624.317, Florida Statutes, as it may deem proper to determine whether any person has violated any provision of the Florida Insurance Code within its respective regulatory jurisdiction or to secure information useful in the lawful administration of any such provision.

15. Section 624.318(2), Florida Statutes, provides, in relevant part, that

[e]very person being examined or investigated, and its officers, attorneys, employees, agents, and representatives, shall make freely available to the department or office or its examiners or investigators the accounts, records, documents, files, information, assets, and matters in their possession or control relating to the subject of the examination or investigation.

16. Section 624.321(1)(b), Florida Statutes, authorizes the Department, during an investigation, to subpoena “books, papers, records, files, correspondence, documents, or other evidence which is relevant to the inquiry.”

17. Section 624.321(2), Florida Statutes states, with emphasis added:

If any person refuses to comply with any such subpoena or to testify as to any matter concerning which she or he may be lawfully interrogated, the Circuit Court of Leon County or of the county wherein such examination, investigation, or hearing is being conducted, or of the county wherein such person resides, may, on the application of the Department or Office, issue an order requiring such person to comply with the subpoena and to testify.

II. FACTS

18. On or about January 31, 2019, the Department’s Bureau of Investigation Deputy Chief, Matthew Guy, discussed ongoing cases and issues related to unlicensed public adjuster activity with the Department’s Division of Investigative and Forensic Services Law Enforcement Captain Erik Cruz.

19. Mr. Guy and Captain Erik Cruz discussed Strem's Law Firm, and complaints that Strem's Law Firm was using unlicensed individuals to adjust insurance claims.

20. During this conversation, Mr. Guy searched for the term "Strem's" within the Department's Automated Licensing Information Systems (ALIS).

21. According to ALIS, Nicola Grados was the only adjuster that Strem's appointed. [Exhibit 5].

22. According to ALIS, Strem's address was 8315 NW 51st Manor, Carol Springs, Florida 33067, the same address as Nicola Grados' business address. [Exhibit 6].

23. According to ALIS, Strem's listed its Federal Employer Identification Number (FEIN) as the same number as Nicola Grados' social security number. [Exhibit 6].

24. Strem's cannot use a social security number to substitute for an FEIN.

25. Strem's did not submit a primary adjuster form to the Department, as required by section 626.8695, Florida Statutes.

26. The Department initiated an investigation to determine the following: if Strem's was operating as an adjusting firm at Nicola Grados' address; if Nicola Grados was the primary adjuster for Strem's; why Strem's had not submitted a Primary Adjuster form; whether Strem's was using unlicensed people to adjust claims.

27. The Department has attached to this motion an affidavit by Insurance Agent & Agency Services Regional Administrator, Christopher G. McGuire. The affidavit describes the Department's efforts to obtain records from Contender Claims Consultants, Guillermo Saavedra, Nicola Faride Grados, and Miguel Angel Grados. [Exhibit 7].

1st Attempt – Initial Visit

28. On Friday, March 1, 2019, Department Investigators went to Nicola Grados'

registered business address.

29. The Investigators met with Nicola Grados at his business address.

30. The Investigators requested access to his books and records.

31. Nicola Grados refused Department access to his books and records.

32. Nicola Grados informed the Investigators that his adjusting contracts were located at Capital Abstract & Title in Coral Springs, Florida.

33. Nicola Grados informed the Investigators that he routinely enrolls his clients in legal services with Strems Law Firm.

34. Nicola Grados contacted his father Miguel Grados while the Investigators were at his business address.

35. Miguel Grados informed the Department that he and his son were represented by an attorney, Edward Tapanes, and that they would not cooperate with the Department's requests.

36. Based on Nicola Grados' assertions, the Investigators continued their inspection at Capital Abstract and Title in Coral Springs, Florida located at 10101 W Sample Road, Coral Springs, Florida 33065.

37. After speaking with the owner of Capital Abstract and Title, the Investigators determined that Contender Claims was renting office space at Capital Abstract and Title.

38. Yasmine Macan, an employee of Contender Claims, advised the Investigators that Contender Claims electronically stored Nicola Grados' adjusting contracts.

39. The Investigators advised Yasmine Macan of their authority to obtain the requested records.

40. Yasmine Macan informed the Investigators that pursuant to Miguel Grados' instructions, she would not provide the records to the Department.

41. Yasmine Macan informed the Investigators that she was represented by Edward Tapanes and would not be cooperating with the Department.

2nd Attempt – Subpoena served on Attorney

42. Based on Miguel Grados' conduct in preventing the Department from reviewing Nicola Grados' records, the Department had reason to believe that Miguel Grados may also have used unlicensed persons under his adjuster license.

43. On July 26, 2019, the Department filed an Investigative Subpoena which commanded Mr. Saavedra individually, and as the president of Contender Claims, and as the Records Custodian of Contender Claims, to produce the following:

1. All Contender Claims Consultants, Incorporated, agency papers and electronic records pertaining to insurance adjusting or the effectuating of insurance adjusting transactions by Mr. Nicola Faride Grados and Mr. Miguel Angle Grados, which have taken place at any location (including Coral Springs, Florida) within the period of August 1, 2017, to present. Such records include but are not limited to: public adjuster agreements, emails, contingent fee retainer agreements and statements of client's rights, receipts from insureds, claims files, computer transactions lists, insurance company communications, applications, declaration pages, however maintained, which are in the possession and control of, or maintained by Contender Claims Consultants, Incorporated or any other location (including Coral Springs, Florida) on the agency's behalf.
2. Any and all monthly bank statements for accounts which hold fiduciary funds for Contender Claims Consultants, Incorporated with the period August 1, 2017, to present.

[Exhibit 8].

44. On August 1, 2019, the Miami Dade County Police Department served Mr. Saavedra through his attorney Edward Tapanes at 990 Biscayne Boulevard, Suite 0-903, Miami, Florida 33132. [Exhibit 8].

3rd Attempt – Subpoena served on Contender Claims’ Custodian of Records

45. On August 29, 2019, the Department issued an Investigative Subpoena which commanded Contender Claims Consultants, Incorporated, and the Records Custodian of Contender Claims Consultants, Incorporated, to produce the same items described in paragraph 43. [Exhibit 9].

46. On September 10, 2019, the Department served its investigative subpoena on Contender Claims through its office manager, Michelle Valdes. [Exhibit 9].

4th Attempt – Agency Visit

47. On September 11, 2019, the Investigators attempted an agency inspection at Contender Claims.

48. The Investigators met with Michelle Valdes and receptionist Victoria Mora at Contender Claims.

49. The Investigators were informed that Mr. Saavedra was not present in the office.

50. Ms. Valdes and Ms. Mora denied access to Contender Claim records.

5th Attempt – New Subpoenas based on Response from Contender Claims

51. On or about September 17, 2019, Contender Claims sent a letter to the Department in response to either the investigative subpoena served on Contender Claims on August 1, 2019, or September 10, 2019. [Exhibit 10].

52. It is unclear whether Contender Claims’ response is directed to the investigative subpoena served on attorney Edward Tapanes on August 1, 2019, or the investigative subpoena served on Michelle Valdes on September 10, 2019.

53. Contender Claims stated “Contender is not in possession of any files or records from Mr. Nicola Faride Grados or Mr. Miguel Angel Grados that are pertaining to insurance

adjusting or effectuating of insurance adjusting.” [Exhibit 10].

54. Contender Claims further stated the Department would need to subpoena the requested records from Stremms Law Firm, Marin, Eljaiek, Lopez & Martinez, P.L., and the Pardo Law firm. [Exhibit 10].

55. On October 1, 2019, the Department issued an Investigative Subpoena which commanded the records custodian of the Pardo Law Firm, P.A. located at 770 North Kendall Drive, Suite 804, Miami, Florida 33156 to produce the same items described in paragraph 43. [Exhibit 11].

56. On October 3, 2019, the Department served its Investigative Subpoena on the Pardo Law Firm, P.A. [Exhibit 11].

57. On October 1, 2019, the Department issued an Investigative Subpoena which commanded the records custodian of Marin, Eljaiek, Lopez & Martinez, P.L. located at 2601 South Bayshore Drive, 18th Floor Coconut Grove, Florida 33133 to produce the same items described in paragraph 43. [Exhibit 12].

58. On October 3, 2019, the Department served its Investigative Subpoena on Marin, Eljaiek, Lopez & Martinez, P.L. [Exhibit 12].

59. On October 1, 2019, the Department issued an Investigative Subpoena which commanded the records custodian of the Stremms Law Firm, P.A., located at 2525 Ponce De Leon Boulevard, Suite 600, Coral Gables, Florida 33134, to produce the same items described in paragraph 43. [Exhibit 13].

60. On October 3, 2019, the Department served its Investigative Subpoena on the Stremms Law Firm, P.A. [Exhibit 13].

61. On October 14, 2019, Marin, Eljaiek, Lopez & Martinez, P.L. responded to the

Department's Investigative Subpoena. [Exhibit 14].

62. Marin, Eljaiek, Lopez & Martinez, P.L. stated that they did not have any of the records which the Department had requested. [Exhibit 14].

Current Situation

63. Contender Claims stated in its September 17, 2019 response that "the work performed by Nicola Faride Grados and Miguel Angel Grados has been as a consultant for attorneys. All files where Nicola Faride Grados and Miguel Angel Grados have acted as a consultants are protected under the Attorney Client and Work Product Privilege." [Exhibit 10].

64. As of the date of filing this Petition, the Department has not received a response to its investigative subpoenas served on Strems Law Firm or the Pardo Law Firm on October 3, 2019.

The Law— General Authority

65. The Department, "[s]hall have the power to subpoena witnesses, compel their attendance and testimony, and require by subpoena the production of books, papers, records, files, correspondence, documents, or other evidence which is relevant to the inquiry." § 624.321(1)(b), Fla. Stat.

66. The Department's investigative subpoenas requested Contender Claims papers and records related to Nicola Grados and Miguel Grados over an approximately two-year period.

67. The investigative subpoenas are neither overly broad nor overly burdensome.

68. It is well-settled that the Department has the authority to conduct investigations and enforce subpoenas to investigate whether violations of the Insurance Code have occurred. *See, e.g., Florida Dept. of Insurance v. Bankers Ins.*, 694 So.2d 70 (Fla. 1st DCA 1997); *Saviak v. Gunter*, 379 So.2d 450 (Fla. 3rd DCA 1980).

Attorney-Client Privilege

69. Respondents have claimed attorney-client privileges before the privileges were in fact established.

70. Pursuant to section 90.502, Florida Statutes, a communication between lawyer and client is 'confidential' if it is not intended to be disclosed to third persons other than 1. Those to whom disclosure is in furtherance of the rendition of legal services to the client. 2. Those reasonably necessary for the transmission of the communication.

71. Nicola Grados admitted that he "routinely enrolls his clients in legal services" to Regional Administrator Chris McGuire. *See* paragraph 33 and Exhibit 7.

72. Pursuant to section 624.321(1)(b), Florida Statutes, the Department is authorized to subpoena any "books, papers, records, files, *correspondence*, documents, or other evidence which is relevant to the inquiry."

73. The Department is entitled to all correspondence generated between the Grados Respondents and their clients prior to when the Grados Respondents enroll their clients in legal services.

74. Respondents have the burden of establishing any attorney-client privileges. *Burrow v. Forjas Taurus S.A.*, 334 F. Supp. 3d 1222, 1227 (S.D. Fla. 2018).

75. The Department asserts that the Respondents never established any attorney-client relationships with any of their clients.

76. The Department requests the Respondents comply with the investigative subpoenas.

77. In the alternative, the Department requests an in-camera review before this Court of all correspondence after August 1, 2017, between the Grados Respondents and their clients as well as all communications during the same timeframe between the Grados Respondents and the law firm Respondents in order to establish when any attorney-client privileges were established.

Work Product

78. Respondents are withholding papers and records from the Department, which the Department cannot obtain without undue hardship.

79. On September 16, 2019, Contender Claims stated,

All files where Nicola Faride Grados and Miguel Angel Grados has acted as a *consultant* are protected under the Attorney Client and Work Product Privilege. Such consulting work was done for attorneys' *in preparation for litigation* where Mr. Nicola Faride Grados or Miguel Angel Grados did not act as the attorneys' expert witness or Adjusters.

80. Pursuant to Florida Fla. R. Civ. P. 1.280(b)(3),

Subject to the provisions of subdivision (b)(4) of this rule, a party may obtain discovery of documents and tangible things otherwise discoverable under subdivision (b)(1) of this rule and prepared *in anticipation of litigation* or for trial by or for another party or by or for that party's representative, including that party's attorney, consultant, surety, indemnitor, insurer, or agent, only upon a showing that the party seeking discovery *has need of the materials* in the preparation of the case and *is unable without undue hardship to obtain the substantial equivalent of the materials by other means*.

(Emphasis added).

81. The Department needs the requested papers and records in order to evaluate whether the licensees have committed any violations of the Florida Insurance Code.

82. The Department is unable to obtain the subpoenaed papers and records by other means without undue hardship because the initial complaints against Nicola Grados and Stremms did not reveal which insurance companies the Respondents may have transacted with.

83. Pursuant to Fla. R. Civ. P. 1.280(b)(4)(B),

A party may discover facts known or opinions held by an expert who has been retained or specially employed by another party in anticipation of litigation or preparation for trial and who is not expected to be called as a witness at trial, only as provided in rule 1.360(b) *or upon a showing of exceptional circumstances under which it is impracticable for the party seeking discovery to obtain facts or opinions on the same subject by other means.*

(Emphasis added).

84. Nicola Grados and Miguel Grados were specially employed by Contender Claims in anticipation of litigation and the Gradoses are not expected to be called as witnesses at trial.

85. Due to the exceptional circumstance of the Department receiving a complaint without identification of the insurers involved, the Department may subpoena the papers and records related to the Gradoses.


86. As to any papers or records related to claims that have not yet been paid, the Department requests the Respondents immediately identify the parties involved and submit the papers and records to the Department within 10 days after the claims have been paid. *See Allstate Indem. Co. v. Ruiz*, 899 So. 2d 1121, 1130 (Fla. 2005) (Instructing courts to employ abatement actions and in-camera inspections when coverage and bad faith actions are initiated simultaneously.)

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CONCLUSION

WHEREFORE, the Department respectfully requests this Court issue an order directing all Respondents to fully comply with the investigative subpoenas by a specific date, failing of which contempt of court sanctions should be imposed against Respondents in accordance with Rules 1.410(c) and 1.570(c), *Florida Rules of Civil Procedure*, and such other sanctions and relief as this Court deems appropriate. However, as to any papers or records related to claims that have not yet been paid, the Department requests this Court order the Respondents to immediately identify the parties involved and submit the papers and records to the Department within 10 days after the claims have been paid. Alternatively, if this Court does not order certain communications between Respondents and clients be turned over, the Department requests this Court issue an order directing an in-camera review of all correspondence after August 1, 2017, between the Grados Respondents and their clients as well as all communications during the same timeframe between the Grados Respondents and the law firm Respondents.

Respectfully submitted this 28th day of November, 2019.


Chase E. Den Beste
Fla. Bar No. 126075
Senior Attorney
Florida Department of Financial Services
200 E. Gaines Street
Tallahassee, FL 32399-0333
Tel.: 850-413-4265
e-mail: chase.denbeste@myfloridacfo.com
Attorney for Plaintiff

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a copy of the foregoing was furnished to Contender Claims Consultants, Guillermo Saavedra, Nicola Faride Grados, and Miguel Angel Grados through their collective attorney by e-mail at et@tapaneslaw.com; the Strems Law Firm through e-mail at clientsupport@stremslaw.com; Marin, Eljaiek, Lopez & Martinez, P.L. by e-mail at MTP@mellawyers.com; and the Pardo Law Firm, P.A. by e-mail at erika@thepardolawfirm.com, on November 26th, 2019.



Chase E. Den Beste
Fla. Bar No. 126075
Senior Attorney
Florida Department of Financial Services
200 E. Gaines Street
Tallahassee, FL 32399-0333
Tel.: 850-413-4265
e-mail: chase.denbeste@myfloridacfo.com
Attorney for Plaintiff



Notes

LICENSEE RECORD

GUILLERMO SAAVEDRA; P150464

License

Status:

Types and Classes for Licenses

3-20 PUBLIC ADJUSTER-ALL LINES - ADJUSTER (VALID)

License Information

Qualifying Appointment?: Yes

Last Lost Active Appointment Date:

Bonded: YES

Collateral Security: NO

CE Compliant: YES

Bond Information

BOND NUMBER

AMOUNT (\$)

SURETY

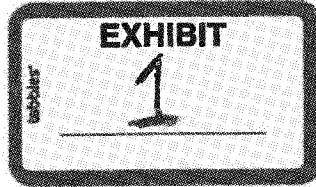
EFFECTIVE DATE

CANCEL DATE

STATUS

STATUS DATE

<u>3980623-2392</u>	50,000	(310501234) GREAT AMERICAN INSURANCE COMPANY	04/21/2008	05/17/2010	CANCELLED	05/17/2010
<u>95804807</u>	50,000	(382907623) GUARANTEE COMPANY OF NORTH AMERICA USA (THE)	06/14/2016		ACTIVE	07/25/2016
<u>3980623-2983</u>	50,000	(310501234) GREAT AMERICAN INSURANCE COMPANY	06/14/2010	06/13/2016	CANCELLED	06/13/2016



License History

RECORD ID	LICENSE STATUS	STATUS DATE	ORIGINAL ISSUE DATE	EXPIRATION DATE
1842105	VALID	06/12/2008	06/12/2008	
1842105	APPLICATION ONLY - APPLICATION - AUTHORIZED - FAIL	06/06/2008	06/12/2008	
1842105	APPLICATION ONLY - APPLICATION - AUTHORIZED - FAIL	05/23/2008	06/12/2008	
1842105	APPLICATION ONLY - APPLICATION - AUTHORIZED	04/30/2008	06/12/2008	
1842105	APPLICATION ONLY - APPLICATION - IN PROCESS - DEFICIENT	04/17/2008	06/12/2008	
1842105	APPLICATION ONLY - NEW	04/15/2008	06/12/2008	



LICENSEE RECORD

GUILLERMO SAAVEDRA,

P150464



Addresses

TYPE	STREET	CITY	COUNTY	STATE	ZIP CODE	DATE MAIL RETURNED	BAD ADDRESS
HOME	6481 SW 73 STREET	SOUTH MIAMI	Dade	Florida	33134		NO
BUSINESS	2600 S DOUGLAS RD SUITE 1004	CORAL GABLES	Dade	Florida	33134		NO
MAILING	2600 S DOUGLAS RD SUITE 1004	CORAL GABLES	Dade	Florida	33134		NO

Phone Numbers

TYPE	COUNTRY CODE	PHONE #	EXTENSION
HOME		1-7571	
BUSINESS		-8672	
MOBILE			

Email Addresses

TYPE	EMAIL ADDRESS	STATUS	LAST UPDATED
MAIN		CLEAR	9/24/2009 5:06:16 PM



Alerts Notes

LICENSEE RECORD

NICOLA FARIDE GRADOS, 591-93-9300, W504442

License

Status:

Types and Classes for Licenses

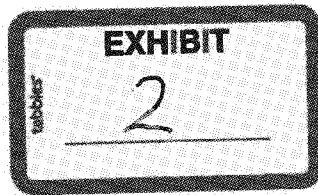
6-20 ADJUSTER - ALL LINES - ADJUSTER (VALID)

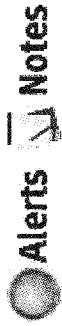
License Information

Qualifying Appointment?: Yes Last Lost Active Appointment Date: Bonded: NO Collateral Security: NO CE Compliant: YES

License History

RECORD ID	LICENSE STATUS	STATUS DATE	ORIGINAL ISSUE DATE	EXPIRATION DATE
3247729	VALID	08/08/2018	08/08/2018	
3247729	APPLICATION ONLY - NEW	08/07/2018	08/08/2018	





LICENSEE RECORD

NICOLA FARIDE GRADOS, 591-93-9300, W504442



Demographics Name History Addresses Address History

Addresses

TYPE	STREET	CITY	COUNTY	STATE	ZIP CODE	DATE MAIL RETURNED	BAD ADDRESS
HOME	8315 NW 51ST MANOR	CORAL SPRINGS	Broward	Florida	33067		NO
BUSINESS	8315 NW 51ST MANOR	CORAL SPRING	Broward	Florida	33067		NO
MAILING	8315 NW 51ST MANOR	CORAL SPRINGS	Broward	Florida	33067		NO

Phone Numbers

TYPE	COUNTRY CODE	PHONE #	EXTENSION
HOME			.5467
BUSINESS			.5467
MOBILE			

Email Addresses

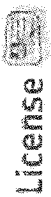
TYPE	EMAIL ADDRESS	STATUS	LAST UPDATED
MAIN		CLEAR	8/2/2018 11:47:53 AM



LICENSEE RECORD

MIGUEL ANGEL GRADOS,

, W371956



Status: ▼

Types and Classes for Licenses

3-20 PUBLIC ADJUSTER-ALL LINES - ADJUSTER (VALID)

License Information

Qualifying Appointment?: Yes

Last Lost Active Appointment Date:

Bonded: YES

Collateral Security: NO

CE Compliant: YES

Bond Information

BOND NUMBER

53487093

AMOUNT (\$)

50,000

SURETY

(460204900)
WESTERN SURETY COMPANY

EFFECTIVE DATE

01/17/2018

CANCEL DATE

ACTIVE

STATUS DATE

02/14/2018

License History

RECORD ID

LICENSE STATUS

STATUS DATE

ORIGINAL ISSUE DATE

EXPIRATION DATE

3150623

VALID

08/14/2018

08/14/2018

3150623

APPLICATION ONLY - APPLICATION - AUTHORIZED

02/14/2018

08/14/2018

3150623

APPLICATION ONLY - APPLICATION - IN PROCESS - DEFICIENT

01/11/2018

08/14/2018

3150623

APPLICATION ONLY - NEW

01/10/2018

08/14/2018





LICENSEE RECORD

MIGUEL ANGEL GRADOS,

W371956



Addresses

TYPE	STREET	CITY	COUNTY	STATE	ZIP CODE	DATE MAIL RETURNED	BAD ADDRESS
HOME	8315 NW 51ST MANOR	CORAL SPRINGS	Broward	Florida	33067		NO
BUSINESS	8315 NW 51ST MANOR	CORAL SPRINGS	Broward	Florida	33067		NO
MAILING	8315 NW 51ST MANOR	CORAL SPRINGS	Broward	Florida	33067		NO

Phone Numbers

TYPE	COUNTRY CODE	PHONE #	EXTENSION
HOME		-0747	
BUSINESS		-0747	
MOBILE			

Email Addresses

TYPE	EMAIL ADDRESS	STATUS	LAST UPDATED
MAIN		CLEAR	11/9/2016 3:13:34 PM



CONTENDER
Claims Consultants, Inc.

FAX COVER SHEET

To

Name: Lorna Noren
Organization Name/Dept: Department of Financial Services
Phone number: -5634
Fax number: 75951 and 3136

From

Sender's Name: Guillermo Saavedra
Sender's Title: Lic. Public Adjuster
Company: Contender Claims Consultants, Inc.

Date sent: January 2, 2012
Time sent: 10:26 AM
of pages including cover page: 4

Lorna,

Attached is the completed and executed designation of the primary adjuster form.

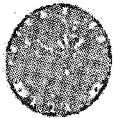
V/R,
Guillermo Saavedra
Lic. Public Adjuster

12950 SW 133rd Court, Miami, FL 33186
Office 8672 Cell: 7571 Fax: .8674
E-Mail: l



PROFORM

411826
Do



DEPARTMENT OF FINANCIAL SERVICES
 Division of Agent & Agency Services – Bureau of Licensing
 200 East Gaines Street, Larson Building Room 419
 Tallahassee, FL 32399-0319

**DESIGNATION/DELETION OF PRIMARY ADJUSTER FOR ADJUSTING FIRM
 And FILING OF FIRM, CORPORATION, OR BUSINESS NAME CHANGE**

This form must be filed with the Department of Financial Services within 30 days of the adjusting firm inception or change of primary adjuster designation, pursuant to 626.8695, Florida Statutes. NOTE: If changes occur regarding item #5 on the REVERSE SIDE, SUCH CHANGES MUST BE FILED, USING THIS FORM, WITH the department within 30 days.

NOTE: THIS FORM CANNOT BE USED AS A CHANGE OF ADDRESS FORM.

1. Owner's full name, license number, and resident address if not an incorporated agency or firm:

P150464			
License Number			
Guillermo Saavedra		8672	
Owner's Name		Resident Telephone Number	
6481 SW 73 Street	Miami	FL	33143
Resident Street Address	City	State	Zip Code

2. Business Name, Federal ID number, street address, and telephone number of the adjusting firm:

5040			
Federal ID Number			
Contender Claims Consultants, Inc.		8672	
Business Name		Business Telephone Number	
13301 SW 132 Ave, Suite 210	Miami	FL	33186
Business Street Address	City	State	Zip Code

3. Full name and license number of the individual who is the designated or deleted Primary Adjuster for the adjusting firm location given in section 2. (See instructions below)

Designate Delete

P150464	
License Number	
Guillermo Saavedra	
Name	

4. Are there additional business locations operating under the same business name given in section 2? Yes No. If "Yes" is marked, list the complete address for each of the additional locations. (Attach additional page if needed.)

Business Street Address	City	State	Zip Code
Business Street Address	City	State	Zip Code

5. Name and license number of the president, directors and other persons associated under the firm or corporate name listed in section 2 that are involved in adjusting or use of the business name:

P058229
License Number
Eileen Pimienta
Name

License Number
Name

License Number
Name

License Number
Name

I understand that if there is a change in the above information, that I must complete a new form and file it with the Department of Financial Services within thirty (30) days.


Signature of Primary Adjuster

12/30/2011

Date

Filing for Calendar Year 20 11

SPECIAL NOTE TO THE DESIGNATED PRIMARY ADJUSTER

When an updated form is filed designating another primary adjuster, the previous designee will no longer be considered the current primary adjuster for that designated location. If you should leave the adjusting firm you will still be considered the primary adjuster until the adjusting firm files a new form. If you will no longer be working at the adjusting firm location as the designated primary adjuster, you are advised to submit this form with item numbers two and three completed and the appropriate delete box checked with your signature in the space provided. Failure to remove yourself as the primary adjuster may result in you continuing to be held responsible for the activities of the adjusting firm until a new designation is made.

FAILURE TO FILE

An adjusting firm location may not conduct the business of insurance unless a primary adjuster is designated at all times. Failure to designate a primary adjuster within thirty (30) days after the inception of the adjusting firm or when there is a change in the primary adjuster designation as required by Florida Statutes shall constitute grounds for requiring the adjusting firm to obtain an adjusting firm license in accordance with section 626.8696, Florida Statutes.

INSTRUCTIONS FOR COMPLETING PRIMARY AGENT/PRIMARY ADJUSTER FORM

To be completed by each operating an adjusting firm and for each location of multiple adjusting firm (See definitions of adjusting firm shown below).

Each location of an adjusting firm shall file the name firm address of the primary adjuster. The primary adjuster may be the same person listed in section 1. If the adjusting firm listed in section 3 is not a corporation, then use the social security number of the individual owner in place of the Federal ID (See definitions of primary adjuster shown below).

One form is required for each designation or deletion. The same form **CANNOT** be used for both. The signature of the primary adjuster is required for each adjusting firm location in order for the designation or deletion to be valid.

DEFINITIONS

Section 626.8695, (2)(b), Florida Statutes: An Adjusting Firm is a location where an independent or public adjuster is engaged in the business of insurance.

Section 626.8695, (2)(a), Florida Statutes: Primary Adjuster is the licensed adjuster who is responsible for the hiring and supervision of all individuals within an adjusting firm location who deal with the public and who acts in the capacity of a public adjuster or independent adjuster. **Note:** An adjuster may be designated as a primary adjuster for only one adjusting firm location.

PLEASE RETURN THIS FORM TO:
Division of Agent & Agency Services
Bureau of Investigation
200 East Gaines Street
Larson Building, Tallahassee, FL 32399-0320
(850) 413-3136

APPOINTING ENTITY RECORD

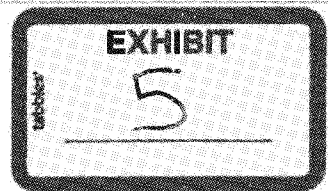
PROFILE
 FINANCIAL SERVICES
 STREMS, 59-1939300, 316821

STREMS, 59-1939300, 316821

Appointment
 Exchange of Business
 License # 5763255
 Licensee Name: ADJUSTER - ALL LINES
 Inactive: 0
 State: 1
 County: 0
 County: Apolka
 Click 'Show Counties' Button to see the counties.

MATCHES 1 - 1 of 1 DISPLAYED

Licensee	License Number	Typ	Receipt #	Status	Original Issue Date	Status Date	Expiration Date	Termination Date	Temporary Type	State / County
GRADUS, NICOLA FARIDE	W504442	0520	5763255 3621321	INACTIVE - CANCELLED - NO LONGER REPRESENTS THE COMPANY	10/26/2018	04/09/2019	05/31/2021		NO	STATE



APPOINTING ENTITY RECORD

STREMS, 59-1939300, 316821

Financial

DATE	DESCRIPTION	LICENSEE	FEES(\$)	PAYMENTS(\$)	REFUNDS(\$)
10/29/2018	Payment - Receipt #: 5763255				\$1.98
10/26/2018	State Appt - New - ADJUSTER-ADJUSTER - ALL LINES(Type Class - 0620)	GRADOS, NICOLA FARIDE		-\$60.00	
10/26/2018	State Appt - New - ADJUSTER-ADJUSTER - ALL LINES(Type Class - 0620)	GRADOS, NICOLA FARIDE		\$0.00	
GRAND TOTALS:				-\$60.00	\$2.00

A/C BALANCE: -\$58.00

Appointments*****
***** REVIEW SUBMISSION - New *****

----- Payment Transaction Details-----
-----Appointing Entity Name: STREMSSubmission ID:-----
-----25416664Confirmation Number: 7Z10NQZBM9Payment-----
----- ApprovedSubmitted By: GRADOS, NICOLA FDate Submitted:-----

0002761503Payment ID:-----
10-26-2018 12:40:46 PM-----
Fee Type with Amount-----
\$0.00Late Fees:-----
\$61.98-----
\$0.00Convenience Fees: \$1.98Total Fees:-----
-----Appointments Fees:-----

Supervising	Licensee Name/ID	Type	Date	Class	Type State /	County Name	Fee/Late Fee
	GRADOS, NICOLA		10/26/2018	0520	N S	Broward	\$60.00 /
	FARIDE / W504442						

Select 

Message for Document ID 30998047

FROM: Florida Department of Financial Services[eAppoint@fldfs.com]

TO: STREMSJ

Sent Date: 26-OCT-18

Status: SENT

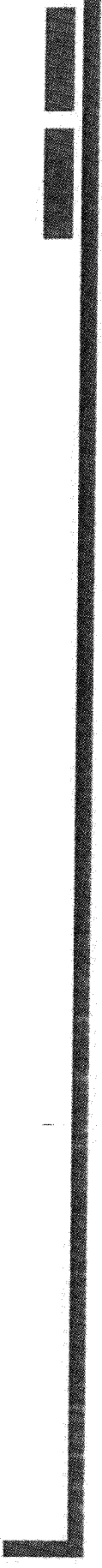
Subject: FLDFS Industry Portal Appointment Payment Summary

You have paid the Department for your appointments. You may view a list of the appointed licensees associated with this submission two hours after the submission has been sent to the department by logging onto eAppoint and clicking on "Review Submissions". If for any reason the submittal could not be approved it will be returned to the workbench so that you may resubmit it.

Total number of State & County Appointments: 1	
Fee Type	Amount
New Appointments Fees	\$60.00
Late Fees	\$0.00
Processing Fee	\$1.98
Total Fees	\$61.98

Payment Transaction Details	
Payment ID	25416664
Confirmation Number	7Z10NQZBM9

This e-mail is for informational purposes only. Please do NOT reply to this message as it is coming from an unmonitored e-mail address.



Select 

Message for Document ID 30998209

FROM: Florida Department of Financial Services[eAppoint@fldfs.com]

TO: STREMS[

Sent Date: 26-OCT-18

Status: SENT

Subject: eAppoint Filing Submitted Successfully

Congratulations, your eAppoint Filing has been submitted successfully.

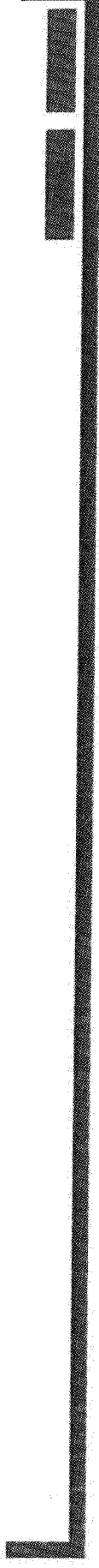
Filing Details:

Filing Type:New Appointments

Appointing Entity Name:STREMS

Date Created:10/26/2018

If you did not authorize this filing, someone has mistakenly filed using your email address. We regret the inconvenience. Please do **NOT** reply to this message as it is coming from an unmonitored email address. Please forward this email to AgentLicensing@MyFloridaCFO.com and advise of your request.



Select 

Message for Document ID 32191659

FROM: Florida Department of Financial Services[eAppoint@fldfs.com]

TO: STREMS[

Sent Date: 09-APR-19

Status: SENT

Subject: eAppoint Filing Submitted Successfully

Congratulations, your eAppoint Filing has been submitted successfully.

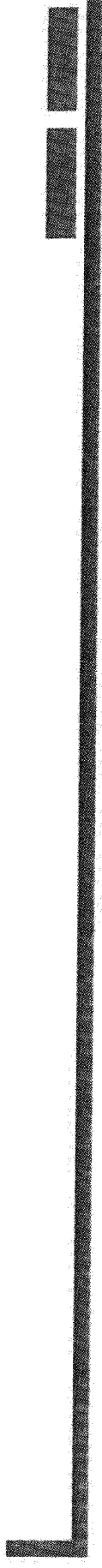
Filing Details:

Filing Type: Terminate Appointments

Appointing Entity Name: STREMS

Date Created: 04/09/2019

If you did not authorize this filing, someone has mistakenly filed using your email address. We regret the inconvenience. Please do **NOT** reply to this message as it is coming from an unmonitored email address. Please forward this email to AgentLicensing@MyFloridaCFO.com and advise of your request.



APPOINTING ENTITY RECORD

STREMS, 59-1939300, 316821



Addresses

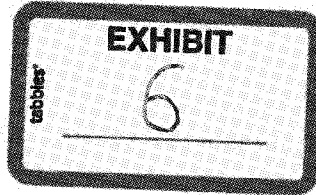
TYPE	STREET	CITY	COUNTY	STATE	ZIP CODE	DATE MAIL RETURNED	BAD ADDRESS
APPOINTMENT INVOICE	8315 NW 51ST MANOR	CORAL SPRINGS		Florida	33067		NO Delete

Phone Numbers

TYPE	COUNTRY CODE	PHONE #	EXTENSION
No Phone number found.			

Email Addresses

TYPE	EMAIL ADDRESS	STATUS	LAST UPDATED
MAIN			



APPOINTING ENTITY RECORD

STREMS, 59-1939300, 316821



Demographic Information for Appointing Entity

Name: STREMS
FEIN: 59-1939300
Branch #: CRGIGFRHJ
Activation Code: NO
Emergency Adjuster Eligibility: NO
Is Agency: NO

Appointing Entity #: 316821
Proprietary #:
Invoice E-Mail / E-Mail Indicator:



1 NAME: Christopher G. McGuire I AM A MALE DOB: 12/09/1963
2 Florida Driver's License: 449-0 OCCUPATION: Regional Administrator
3 BUSINESS ADDRESS: 1400 West Commercial Blvd., # 135, Fort Lauderdale, FL 33309
4 EMPLOYER: Dept. of Financial Services BUSINESS PHONE: / -5535
5 Email: r'

6

7 RE: All Lines Adjuster Nicola Grados (W504442) / Case # MC-3967635
8

9 I swear I have personal knowledge of the following facts and these facts are true and
10 correct to the best of my knowledge and belief:

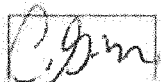
11 The undersigned Affiant is employed as an Administrator with the Department of Financial
12 Services with the State of Florida. On Friday, March 1, 2019, Special Investigators Eneida
13 Jaen, Glenn Chapter and I attempted an agency inspection of Mr. Nicola Grados' adjusting
14 agency. The inspection was precipitated by an allegation that All Lines Adjuster Nicola
15 Grados used unlicensed "loss consultants" to act as public adjusters. It was further alleged
16 that Mr. Grados had no Primary Adjuster form filed with our Department. Due to the fact
17 that Mr. Grados indicated in his licensing profile with our Bureau of Licensing that his
18 business address was in Coral Springs, Florida, we first went to that location. The address
19 was 8315 NW 51st Manor, Coral Springs, Florida 33067. Upon arrival, we were surprised to
20 discover that this was a residential, single-family home, and not a business as Mr. Grados
21 had represented to the Department. When we knocked on the door, we introduced
22 ourselves, and we were greeted by a young lady who resided there who identified herself
23 as Nicola Grados' mom. Nicola Grados then came to the door as well. We then conducted
24 a brief interview of Mr. Grados. During the course of the discussion, Mr. Grados informed



25 us he routinely enrolls his clients in legal services with Strems Law Firm, but he added that
26 his clients are well informed of this fact, and they acknowledge it when they sign his
27 adjusting agreement. We requested that he provide us with access to his books and
28 records, and he refused. I then provided him with copies of our statutes including 624.318,
29 Florida Statutes and 626.748, Florida Statutes, and I went through it and advised him of our
30 statutory authority to review his records to no avail. He then called his dad (Miguel Grados /
31 W371956). Mr. Miguel Grados told us that he and his son were represented by Strems
32 attorney Edward Tapanes, and they would not be cooperating with us any further.
33 However, just prior to his dad calling, Nicola Grados informed us that his adjusting
34 contracts were located in the custody of Capital Abstract & Title in Coral Springs, Florida.
35 Once our conversation with Nicola Grados and Miguel Grados ended, we then proceeded
36 to the Capital Abstract & Title office in Coral Springs, Florida. Upon arrival, we met with Ms.
37 Yasmine Macan who informed us she would not be providing us with any access to their
38 records. She did admit that they had Mr. Grados' adjusting contracts electronically stored,
39 but she advised that Miguel Grados had admonished her not to provide them to us. I then
40 provided her with copies of our statutes including 624.318, Florida Statutes and 626.748,
41 Florida Statutes, and I went through it and advised her of our statutory authority to review
42 their records to no avail. Ms. Macan told us she was represented by Strems attorney
43 Edward Tapanes, and she would not be cooperating with us any further. We later called
44 Attorney Paul Mandel at Capital Abstract & Title and asked who had custody of these
45 adjusting records. He advised that Miguel Grados and his son are merely tenants that rent
46 out a back office in his suite. He denied having any access to those records. Attorney



47 Mandel explained that the office signage on their door indicates, "Contender Claims
48 Consultants". On August 1, 2019, the Miami-Dade County Police Department served an
49 investigative subpoena to the attention of Contender Claims' primary adjuster Guillermo
50 Saavedra (P150464) on Attorney Edward Tapanes at his law office on behalf of Contender
51 Claims. On August 19, 2019, Special Investigator Glenn Chapter and I re-attempted an
52 agency inspection of Mr. Nicola Grados' adjusting agency in Coral Springs. However, we
53 were informed by Attorney Paul Mandel at Capital Abstract & Title that Contender Claims
54 moved out in July 2019. On August 21, 2019, staff then visited the Contender Claims
55 Consulting agency in Coral Gables and met with receptionist Ms. Victoria Mora and office
56 manager Michelle Valdes. Ms. Valdes stated Guillermo Saavedra was not in the office
57 today. Ms. Valdes also stated, they did not receive any notification about the subpoena
58 from their attorney Edward Tapanes. I then read them our statutes including 624.318,
59 Florida Statutes and 626.748, Florida Statutes, and I went through it and advised them of
60 our statutory authority to review their records to no avail. Because they denied receiving the
61 subpoena, a new subpoena was served to office manager Michelle Valdes of Contender
62 Claims as the records custodian of the agency on September 5, 2019. On September 11,
63 2019, Special Investigators Glenn Chapter, Ken Orzel and I re-attempted an agency
64 inspection of Mr. Nicola Grados' Contender Claims agency in Coral Gables. Just as before,
65 we met with receptionist Ms. Victoria Mora and office manager Michelle Valdes. Ms. Valdes
66 stated Guillermo Saavedra was not in the office. Both ladies again refused to grant us
67 access to records despite the service of the second subpoena. A copy of the subpoena
68 was then provided to them. Just as before, I then read them our statutes including 624.318,



69 Florida Statutes and 626.748, Florida Statutes, and I went through it and advised them of
70 our statutory authority to review their records to no avail. The inspection attempt was then
71 aborted at this point.

72 People who should always know how to contact me if my contact information should
73 change:

74
75 (Name, address, phone)

76 Under penalty of perjury, I, Christopher G. McGuire have read the above statement consisting of
77 4 page(s) and I declare at this time the events as stated are clear in my mind and that the
78 statements are true and correct to the best of my knowledge and belief.

79 I am willing to appear at a hearing.

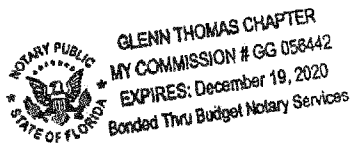
80
81 
82 (Signature)

83 The foregoing affidavit was sworn to and subscribed before me this 12th day of September,
84 2019, by CHRISTOPHER MCGUIRE, who is:

85 Personally known to me, OR
86 Produced _____ as identification.

87 SWORN TO AND SUBSCRIBED before me this 12th day of SEPTEMBER, 2019

88
89 
NOTARY PUBLIC

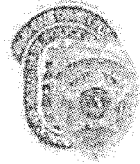




Miami-Dade Police Department

Court Services Section

Juan J. Perez
Director / Metropolitan Sheriff



STATE OF FLORIDA DEPARTMENT OF FINANCIAL SERVICES vs. INVESTIGATION AND INSPECTION OF RECORDS

Case Number
MC-3967635 /CA-31713

RETURN OF SERVICE

SUBPOENA - CIVIL

8/1/19 11:17 am	Served - Corporate Service	SERVED	RECORDS CUSTODIAN OF CONTENDER CLAIMS CONSULTANTS, INCORPORATED
-----------------	----------------------------	--------	---

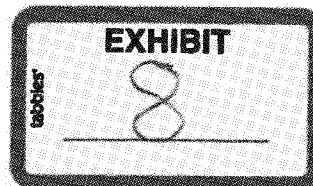
07/30/2019 Came this day into hand of the Sheriff

07/31/2019 04:30 PM - CSS1 DANIEL GOOD #8912, ATTEMPTED TO SERVE THE SUBPOENA TO RECORDS CUSTODIAN OF CONTENDER CLAIMS CONSULTANTS, INCORPORATED AT 2600 SOUTH DOUGLAS ROAD, SUITE 1004, CORAL GABLES, FL 33134. WINPER STAFF ATTIRNEY WILL ACCEPT AT NEW QTH

08/01/2019 11:17 AM - SERVED THE SUBPOENA UPON RECORDS CUSTODIAN OF CONTENDER CLAIMS CONSULTANTS, INCORPORATED AT 2600 SOUTH DOUGLAS ROAD, SUITE 1004, CORAL GABLES, FL 33134 BY DELIVERING A COPY TO SANDRA MOGOLON, AT 990 BISCAYNE BLVD, STE. 0-903, MIAMI, FL. IN ACCORDANCE WITH F.S. 48.081 AND F.S. 48.091. SERVICE AFFECTED BY: CSS1 CARCHAREL SMITH #8851, DEPUTY SHERIFF OF MIAMI-DADE COUNTY, FL.


CARCHAREL SMITH, CSS1, #8851

CHRISTOPHER McGUIRE
1400 W. COMMERCIAL BOULEVARD
SUITE #135
FORT LAUDERDALE, FL 33309



**STATE OF FLORIDA
DEPARTMENT OF FINANCIAL SERVICES**



Jimmy Patronis
Chief Financial Officer of Florida

IN THE MATTER OF:

Nicola Faride Grados
Case No.: MC-3967635 /CA-31713

**Investigation and
Inspection of Records**

INVESTIGATIVE SUBPOENA

TO: Mr. Guillermo Saavedra Individually
and as the President of Contender Claims Consultants, Incorporated and/or
Records Custodian of Contender Claims Consultants, Incorporated
2600 South Douglas Road, Suite 1004
Coral Gables, Florida 33134

Pursuant to the authority contained in Sections 624.307, 624.310, 624.317, 624.318, 624.321, 626.561, 626.601, 626.875, and 626.9561, Florida Statutes, The Florida Department of Financial Services is conducting an investigation and an examination in the above-styled matter to determine the existence of any violation of the Florida Insurance Code.

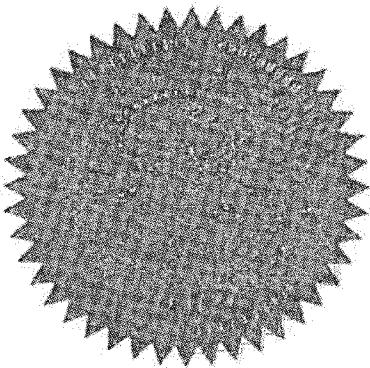
YOU ARE, THEREFORE, COMMANDED to produce to the Florida Department of Financial Services investigator for investigation, examination, inspection and photocopying the following:

1. All Contender Claims consultants, Incorporated, agency papers and electronic records pertaining to insurance adjusting or the effectuating of insurance adjusting transactions by Mr. Nicola Faride Grados and Mr. Miguel Angel Grados, which have taken place at any location (including Coral Springs, Florida) within the period August 1, 2017, to present. Such records include, but are not limited to: public adjuster agreements, emails, contingent fee retainer agreements and statements of client's right, receipts from insureds, claims files, computer transactions lists, insurance company communications, applications, declarations pages, however maintained, which are in the possession and control of, or maintained by Contender Claims Consultants, Incorporated or any other location (including Coral Springs, Florida) on the agency's behalf.
2. Any and all monthly bank statements for accounts which hold fiduciary funds for Contender Claims Consultants, Incorporated within the period August 1, 2017, to present.


You must comply with this subpoena by producing these materials **INSTANTER** to **Glenn Chapter, Special Investigator, Florida Department of Financial Services, Bureau of Investigation, 1400 West Commercial Boulevard, Suite 135, Fort Lauderdale, Florida 33309-3792, (954) 958-5533.**

Refusal to comply with this subpoena may result in the application to the Circuit Court to require compliance. (Section 624.321 (2), Florida Statutes)

PLEASE BE GOVERNED ACCORDINGLY.



WITNESS: Jimmy Patronis
Chief Financial Officer
The Capitol
Tallahassee, Florida 32399-0300

BY: 

Gregory Thomas
Director, Insurance Agent and Agency Services

DATE: July 26, 2019

VERIFIED RETURN OF SERVICE

State of Florida

County of

Court

Case Number: MC-3967635/CA-31713

Plaintiff:

STATE OF FLORIDA DEPARTMENT OF FINANCIAL SERVICES

vs.

Defendant:

IN THE MATER OF: NICOLA FARIDE GRADOS

For:

Chris McGuire

FLORIDA DEPARTMENT OF FINANCIAL SERVICES, INVESTIGATIVE

1400 W. Commercial Blvd.

Suite 135

Fort Lauderdale, FL 33309

Received by C. ZIRKLE on the 5th day of September, 2019 at 11:00 am to be served on **CONTENDER CLAIMS CONSULTANTS, INCORPORATED RECORDS CUSTODIAN OF CONTENDER CLAIMS CONSULTANTS, INCORPORATED, 2600 SOUTH DOUGLAS ROAD, SUITE 1004, CORAL GABLES, FL 33134.**

I, CHARLES ZIRKLE, do hereby affirm that on the 10th day of September, 2019 at 10:48 am, I:

SUBSTITUTE - BUSINESS OFFICE: served by delivering a true copy of the **INVESTIGATIVE SUBPOENA** with the date and hour of service endorsed thereon by me, to: **MICHELLE VALDES** as **OFFICE MANAGER**, a person employed therein and authorized to accept service for **CONTENDER CLAIMS CONSULTANTS, INCORPORATED** at the address of: **2600 SOUTH DOUGLAS ROAD, SUITE 1004, CORAL GABLES, FL 33134**, the within named person's usual place of business, in compliance with State Statutes 48.031.

Additional information pertaining to this Service:

AT THE TIME OF SERVICE, THE PROCESS SERVER WAS ADVISED THAT GUILLERMO SAAVEDRA, PRESIDENT/DIRECTOR (SOLE OFFICER) WAS NOT IN. SERVICE WAS MADE BY SERVING THE PERSON IN CHARGE.

I certify that I am over the age of 18, have no interest in the above action, and I am a Special Process Server, in good standing, in the judicial circuit in which the process was served. Under Penalties of perjury, I declare that I have read the foregoing document and that the facts stated in it are true.



CHARLES ZIRKLE
SPS #110

C. ZIRKLE
3408 N.W. 68TH CT
Ft. Lauderdale, FL 33309
(754) 422-9788

Our Job Serial Number: CZP-2019000194



**STATE OF FLORIDA
DEPARTMENT OF FINANCIAL SERVICES**



Jimmy Patronis
Chief Financial Officer of Florida

IN THE MATTER OF:

Nicola Faride Grados
Case No.: MC-3967635/CA-31713

**Investigation and
Inspection of Records**

INVESTIGATIVE SUBPOENA

TO: Contender Claims Consultants, Incorporated
Records Custodian of Contender Claims Consultants, Incorporated
2600 South Douglas Road, Suite 1004
Coral Gables, Florida 33134

*MICHELLE VALDES
OFFICE MANAGER
10:48AM
9/10/19*

Pursuant to the authority contained in Sections 624.307, 624.310, 624.317, 624.318, 624.321, 626.561, 626.601, 626.875, and 626.9561, Florida Statutes, The Florida Department of Financial Services is conducting an investigation and an examination in the above-styled matter to determine the existence of any violation of the Florida Insurance Code.

YOU ARE, THEREFORE, COMMANDED to produce to the Florida Department of Financial Services investigator for investigation, examination, inspection and photocopying the following:

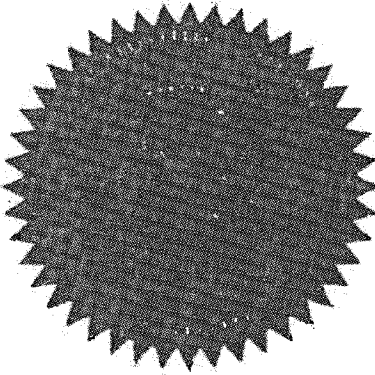
1. All Contender Claims Consultants, Incorporated, agency papers and electronic records pertaining to insurance adjusting or the effectuating of insurance adjusting transactions by Mr. Nicola Faride Grados and Mr. Miguel Angel Grados, which have taken place at any location (including Coral Springs, Florida) within the period August 1, 2017, to present in order to verify records are maintained in accordance with the Florida Statutes. Such records include, but are not limited to: public adjuster agreements, emails, contingent fee retainer agreements and statements of client's rights, receipts from insureds, claims files, computer transactions lists, insurance company communications, applications, Declarations pages, however maintained, which are in the possession and control or, or maintained by Contender Claims Consultants, Incorporated or at any other location (including Coral Springs, Florida) on the agency's behalf.
2. Any and all monthly bank statements for which accounts hold fiduciary funds for Contender Claims Consultants, Incorporated within the period August 1, 2017 to present.


You must comply with this subpoena by producing these materials **INSTANTER** to **Glenn Chapter, Special Investigator, Florida Department of Financial Services, Bureau of Investigation, or any other Department of Financial Services authorized representative.**

Refusal to comply with this subpoena may result in the application to the Circuit Court to require compliance. (Section 624.321 (2), Florida Statutes)

PLEASE BE GOVERNED ACCORDINGLY.

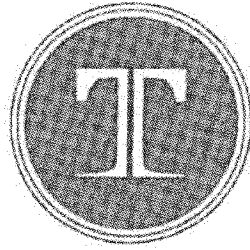
WITNESS: Jimmy Patronis
Chief Financial Officer
The Capitol
Tallahassee, Florida 32399-0300



BY: 

Gregory Thomas
Director, Insurance Agent and Agency Services

DATE: August 29, 2019



TAPANES LAW

September 16, 2019

Department of Financial Services
Bureau of Investigation
Attn: Special Investigator Glenn Chapter
1400 West Commercial Blvd. Suite 135
Fort Lauderdale, Florida 33309-3792

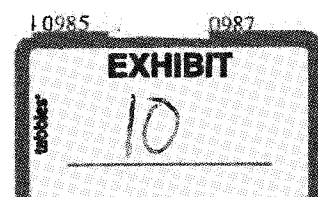
**Re: Guillermo Saavedra / Contender Claims Consultants, Inc.
Case# MC 3967635/CA 31713**

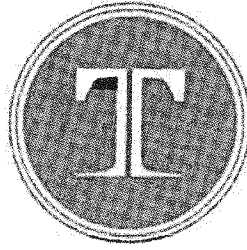
Dear Mr. Chapter:

This Firm represents Contender Claims Consultant, Inc., (“Contender”) and Guillermo Saavedra (Saavedra). Please refer all future communications to this Firm.

In regards to a subpoena issued by your Department for Contender Claims Consultants, Inc., and Guillermo Saavedra regarding the “All Contender Claims consultants, Incorporated, agency papers and electronic records pertaining to insurance adjusting or effectuating of insurance adjusting transactions by Mr. Nicola Faride Grados and Mr. Miguel Angel Grados which have taken place at any location (including Coral Springs, Florida) within the period August 1, 2017, to present.” [SIC] – Contender and Saavedra state as follows:

Contender is not in possession of any files or records from Mr. Nicola Faride Grados or Mr. Miguel Angel Grados that are pertaining to insurance adjusting or





TAPANES LAW

effectuating of insurance adjusting. The work performed by Nicola Faride Grados and Miguel Angel Grados has been as a consultant for attorneys. All files where Nicola Faride Grados and Miguel Angel Grados has acted as a consultant are protected under the Attorney Client and Work Product Privilege. Such consulting work was done for attorneys' in preparation for litigation where Mr. Nicola Faride Grados or Miguel Angel Grados did not act as the attorneys' expert witness or Adjusters. The following are the names of attorneys that Contender Claims work for during the time frame outlined in the subpoena:

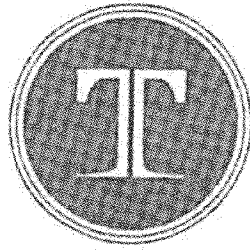
Strems Law Firm

Marin, Eljaiek, Lopez & Martinez, P.L.

Pardo Law Firm

You will need to subpoena those records directly from said attorneys. As stated above, Mr. Saavedra, as custodian of records, is not currently in possession of any adjusting records from Nicola Faride Grados or Miguel Angel Grados. Contender claims apologizes for the delay in response to the subpoena however, after careful review, Contender has determined that the requested information is considered privileged and confidential.

In regards to the second request of the subpoena related to Contender's fiduciary bank account statements from August 1, 2017 to present, please find enclosed the



TAPANES LAW

bank statements from Chase with account ending in 1592. If we can be of any further assistance, please do not hesitate to contact us

Accordingly,

/s/ Edward Tapanes

Edward Tapanes, Esq.
et@tapaneslaw.com

Enclosures:

**STATE OF FLORIDA
DEPARTMENT OF FINANCIAL SERVICES**



Jimmy Patronis
Chief Financial Officer of Florida

IN THE MATTER OF:

Nicola Faride Grados
Case No.: MC-3967635/CA-31713

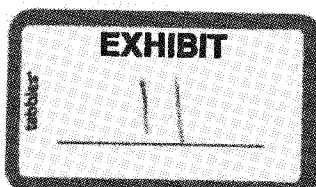
**Investigation and
Inspection of Records**

INVESTIGATIVE SUBPOENA

TO: The Pardo Law Firm, P.A.
Records Custodian and/or Person Most Knowledgeable
7700 North Kendall Drive, Suite 804
Miami, Florida 33156

Pursuant to the authority contained in Sections 624.307, 624.310, 624.317, 624.318, 624.321, 626.561, 626.601, 626.875, and 626.9561, Florida Statutes, The Florida Department of Financial Services is conducting an investigation and an examination in the above-styled matter to determine the existence of any violation of the Florida Insurance Code.

YOU ARE, THEREFORE, COMMANDED to produce to the Florida Department of Financial Services investigator for investigation, examination, inspection and photocopying the following:



1. All Contender Claims Consultants, Incorporated, agency papers and electronic records pertaining to insurance adjusting or the effectuating of insurance adjusting transactions by Mr. Nicola Faride Grados and Mr. Miguel Angel Grados, which have taken place at any location (including Coral Springs, Florida) within the period August 1, 2017, to present in order to verify records are maintained in accordance with the Florida Statutes. Such records include, but are not limited to: public adjuster agreements, emails, contingent fee retainer agreements and statements of client's rights, receipts from insureds, claims files, computer transactions lists, insurance company communications, applications, Declarations pages, however maintained, which are in the possession and control or, or maintained by Contender Claims Consultants, Incorporated or at any other location (including Coral Springs, Florida) on the agency's behalf.
2. Any and all monthly bank statements for which accounts hold fiduciary funds for Contender Claims Consultants, Incorporated within the period August 1, 2017 to present.


You must comply with this subpoena by producing these materials **INSTANTER** to **Glenn Chapter, Special Investigator, Florida Department of Financial Services, Bureau of Investigation, or any other Department of Financial Services authorized representative.**

Refusal to comply with this subpoena may result in the application to the Circuit Court to require compliance. (Section 624.321 (2), Florida Statutes)

PLEASE BE GOVERNED ACCORDINGLY.

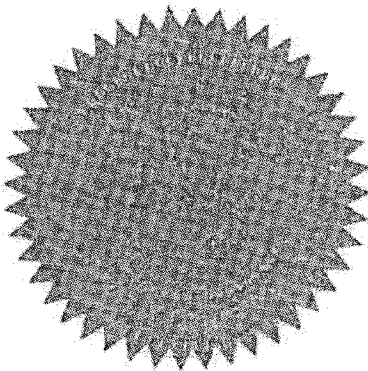
WITNESS: Jimmy Patronis
Chief Financial Officer
The Capitol
Tallahassee, Florida 32399-0300

BY: _____



Gregory Thomas
Director, Insurance Agent and Agency Services

DATE: October 1, 2019



Florida Elite Process Service, Inc.
P.O. Box 557403
Miami, FL 33255-7403
Phone .8755
Fax: -7711
77-0/19884

INVOICE

Invoice #FEP-2019000727
10/4/2019

CHRISTOPHER McGuire
FLORIDA DEPARTMENT OF FINANCIAL SERVICES
1400 COMMERCIAL BLVD.
SUITE 135
FT.LAUDERDALE, FL 33309-3792

Case Number: Miami-Dade MC-3967635-CA-31713

Plaintiff:
IN THE MATTER OF: NICOLA FARIDE GRADOS.,

Defendant:

Received: 10/2/2019 Served: 10/3/2019 12:25 pm CORPORATE - EMPLOYEE
To be served on: RC/ THE PARDO LAW FIRM, P.A., Attn: Person Most knowledgeable

ITEMIZED LISTING

Line Item	Quantity	Price	Amount
Service Fee (Local)	1.00	90.00	90.00
TOTAL CHARGED:			\$90.00
10/4/2019 CC **card Final Payment			90.00
BALANCE DUE:			\$0.00

Thank you for your business!

Please enclose a copy of this invoice with your payment. There will be a 3.5% fee per credit card transaction.
PAYMENT IS NOT CONTINGENT UPON REIMBURSEMENT FROM CLIENT.
PAYMENT DUE UPON RECEIPT. A late fee of \$40.00 will be charged for invoices that remain unpaid passed sixty (60) days. If Florida Elite Process Service, Inc. is forced to commence collection practices against client, client will be responsible for costs and attorney's fees incurred by FEPSI, and FEPSI will charge interest at the rate of 10% per annum on invoices outstanding passed ninety (90) days.

RETURN OF SERVICE

State of Florida

County of Miami-Dade

Circuit Court Court

Case Number: MC-3967635-CA-31713

Plaintiff:

IN THE MATTER OF: NICOLA FARIDE GRADOS.,

vs.

Defendant:

For:

CHRISTOPHER McGuire
FLORIDA DEPARTMENT OF FINANCIAL SERVICES
1400 COMMERCIAL BLVD.
SUITE 135
FT.LAUDERDALE, FL 33309-3792



Received by Florida Elite Process Service, Inc. on the 2nd day of October, 2019 at 1:03 pm to be served on **RC/ THE PARDO LAW FIRM, P.A., Attn: Person Most knowledgeable, 7700 NORTH KENDALL DRIVE, SUITE 804, MIAMI, FL 33156.**

I, Albert Arriera, do hereby affirm that on the **3rd day of October, 2019 at 12:25 pm, I:**

served a **CORPORATION** by delivering a true copy of the **INVESTIGATIVE SUBPOENA** with the date and hour of service endorsed thereon by me, to: **Ashley Redondo as Legal Assistant**, an employee who is authorized to accept service for **RC/ THE PARDO LAW FIRM, P.A., Attn: Person Most knowledgeable** in the absence of the Registered Agent, President, Vice President, Secretary, Treasurer, or any other corporate officer at the address of: **7700 NORTH KENDALL DRIVE, SUITE 804, MIAMI, FL 33156**, and informed said person of the contents therein, in compliance F.S. 48.081(3)(a).

Description of Person Served: Age: 27, Sex: F, Race/Skin Color: Hispanic, Height: 5'6", Weight: 125, Hair: Dark Blonde, Glasses: N

I certify that I am over the age of 18 and have no interest in the above action. Under penalty of perjury, I declare that I have read the foregoing and that the facts stated in it are true. **NO NOTARY REQUIRED PURSUANT TO F.S. 92.525 (2)**

A handwritten signature in black ink, appearing to read 'A. Arriera', written over a horizontal line.

Albert Arriera
Process Server

Florida Elite Process Service, Inc.
P.O. Box 557403
Miami, FL 33255-7403
.8755

Our Job Serial Number: FEP-2019000727

**STATE OF FLORIDA
DEPARTMENT OF FINANCIAL SERVICES**



Jimmy Patronis
Chief Financial Officer of Florida

IN THE MATTER OF:

Nicola Faride Grados
Case No.: MC-3967635/CA-31713

**Investigation and
Inspection of Records**

INVESTIGATIVE SUBPOENA

TO: Marin, Eljaiek, Lopez & Martinez, P.L.
Records Custodian and/or Person Most Knowledgeable
2601 South Bayshore Drive, 18th Floor
Coconut Grove, Florida 33133

Pursuant to the authority contained in Sections 624.307, 624.310, 624.317, 624.318, 624.321, 626.561, 626.601, 626.875, and 626.9561, Florida Statutes, The Florida Department of Financial Services is conducting an investigation and an examination in the above-styled matter to determine the existence of any violation of the Florida Insurance Code.

YOU ARE, THEREFORE, COMMANDED to produce to the Florida Department of Financial Services investigator for investigation, examination, inspection and photocopying the following:



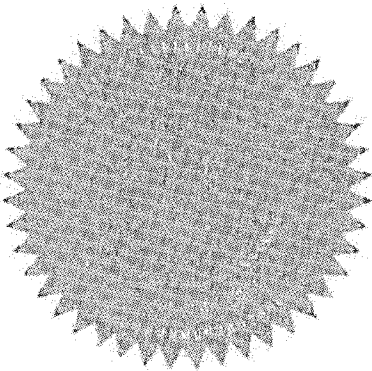
1. All Contender Claims Consultants, Incorporated, agency papers and electronic records pertaining to insurance adjusting or the effectuating of insurance adjusting transactions by Mr. Nicola Faride Grados and Mr. Miguel Angel Grados, which have taken place at any location (including Coral Springs, Florida) within the period August 1, 2017, to present in order to verify records are maintained in accordance with the Florida Statutes. Such records include, but are not limited to: public adjuster agreements, emails, contingent fee retainer agreements and statements of client's rights, receipts from insureds, claims files, computer transactions lists, insurance company communications, applications, Declarations pages, however maintained, which are in the possession and control or, or maintained by Contender Claims Consultants, Incorporated or at any other location (including Coral Springs, Florida) on the agency's behalf.
2. Any and all monthly bank statements for which accounts hold fiduciary funds for Contender Claims Consultants, Incorporated within the period August 1, 2017 to present.


You must comply with this subpoena by producing these materials **INSTANTER** to **Glenn Chapter, Special Investigator, Florida Department of Financial Services, Bureau of Investigation, or any other Department of Financial Services authorized representative.**

Refusal to comply with this subpoena may result in the application to the Circuit Court to require compliance. (Section 624.321 (2), Florida Statutes)

PLEASE BE GOVERNED ACCORDINGLY.

WITNESS: Jimmy Patronis
Chief Financial Officer
The Capitol
Tallahassee, Florida 32399-0300



BY: 

Gregory Thomas
Director, Insurance Agent and Agency Services

DATE: October 1, 2019

Florida Elite Process Service, Inc.
P.O. Box 557403
Miami, FL 33255-7403
Phone: 77-8755
Fax: 77-7711
77-0719884

INVOICE

Invoice #FEP-2019000729
10/4/2019

CHRISTOPHER McGuire
FLORIDA DEPARTMENT OF FINANCIAL SERVICES
1400 COMMERCIAL BLVD.
SUITE 135
FT.LAUDERDALE, FL 33309-3792

Case Number: Miami-Dade MC-3967635-CA-31713

Plaintiff:
IN THE MATTER OF: NICOLA FARIDE GRADOS.,

Defendant:

Received: 10/2/2019 Served: 10/3/2019 11:50 am CORPORATE - EMPLOYEE
To be served on: RC/ MARIN, ELJAIK, LOPEZ & MARTINEZ, P.L. Attn: Person Most knowledgeable

ITEMIZED LISTING

Line Item	Quantity	Price	Amount
Service Fee (Local)	1.00	90.00	90.00
TOTAL CHARGED:			\$90.00
10/4/2019 CC **card Final Payment			90.00
BALANCE DUE:			\$0.00

Thank you for your business!

Please enclose a copy of this invoice with your payment. There will be a 3.5% fee per credit card transaction.

PAYMENT IS NOT CONTINGENT UPON REIMBURSEMENT FROM CLIENT.

PAYMENT DUE UPON RECEIPT. A late fee of \$40.00 will be charged for invoices that remain unpaid passed sixty (60) days. If Florida Elite Process Service, Inc. is forced to commence collection practices against client, client will be responsible for costs and attorney's fees incurred by FEPSI, and FEPSI will charge interest at the rate of 10% per annum on invoices outstanding passed ninety (90) days.

RETURN OF SERVICE

State of Florida

County of Miami-Dade

Circuit Court Court

Case Number: MC-3967635-CA-31713

Plaintiff:

IN THE MATTER OF: NICOLA FARIDE GRADOS.,

vs.

Defendant:

For:

CHRISTOPHER McGuire
FLORIDA DEPARTMENT OF FINANCIAL SERVICES
1400 COMMERCIAL BLVD.
SUITE 135
FT.LAUDERDALE, FL 33309-3792



FEP2019000729

Received by Florida Elite Process Service, Inc. on the 2nd day of October, 2019 at 1:03 pm to be served on **RC/ MARIN, ELJAIK, LOPEZ & MARTINEZ, P.L. Attn: Person Most knowledgeable, 2601 SOUTH BAYSHORE DRIVE, 18TH FLOOR, COCONUT GROVE, FL 33133.**

I, Albert Arriera, do hereby affirm that on the **3rd day of October, 2019 at 11:50 am, I:**

served a **CORPORATION** by delivering a true copy of the **INVESTIGATIVE SUBPOENA** with the date and hour of service endorsed thereon by me, to: **Melissa Doe as Front Desk Receptionist**, an employee who is authorized to accept service for **RC/ MARIN, ELJAIK, LOPEZ & MARTINEZ, P.L. Attn: Person Most knowledgeable** in the absence of the Registered Agent, President, Vice President, Secretary, Treasurer, or any other corporate officer at the address of: **2601 SOUTH BAYSHORE DRIVE, 18TH FLOOR, COCONUT GROVE, FL 33133**, and informed said person of the contents therein, in compliance F.S. 48.081(3)(a).

Description of Person Served: Age: 25, Sex: F, Race/Skin Color: Hispanic, Height: 5'5", Weight: 125, Hair: Black, Glasses: n

I certify that I am over the age of 18 and have no interest in the above action. Under penalty of perjury, I declare that I have read the foregoing and that the facts stated in it are true. **NO NOTARY REQUIRED PURSUANT TO F.S. 92.525 (2)**

A handwritten signature in black ink, appearing to read 'Albert Arriera', written over a horizontal line.

Albert Arriera
Process Server

Florida Elite Process Service, Inc.
P.O. Box 557403
Miami, FL 33255-7403
8755

Our Job Serial Number: FEP-2019000729

**STATE OF FLORIDA
DEPARTMENT OF FINANCIAL SERVICES**



Jimmy Patronis
Chief Financial Officer of Florida

IN THE MATTER OF:

Nicola Faride Grados
Case No.: MC-3967635/CA-31713

**Investigation and
Inspection of Records**

INVESTIGATIVE SUBPOENA

TO: The Strem Law Firm, P.A.
Records Custodian and/or Person Most Knowledgeable
2525 Ponce De Leon Boulevard, Suite 600
Coral Gables, Florida 33134

Pursuant to the authority contained in Sections 624.307, 624.310, 624.317, 624.318, 624.321, 626.561, 626.601, 626.875, and 626.9561, Florida Statutes, The Florida Department of Financial Services is conducting an investigation and an examination in the above-styled matter to determine the existence of any violation of the Florida Insurance Code.

YOU ARE, THEREFORE, COMMANDED to produce to the Florida Department of Financial Services investigator for investigation, examination, inspection and photocopying the following:




1. All Contender Claims Consultants, Incorporated, agency papers and electronic records pertaining to insurance adjusting or the effectuating of insurance adjusting transactions by Mr. Nicola Faride Grados and Mr. Miguel Angel Grados, which have taken place at any location (including Coral Springs, Florida) within the period August 1, 2017, to present in order to verify records are maintained in accordance with the Florida Statutes. Such records include, but are not limited to: public adjuster agreements, emails, contingent fee retainer agreements and statements of client's rights, receipts from insureds, claims files, computer transactions lists, insurance company communications, applications, Declarations pages, however maintained, which are in the possession and control or, or maintained by Contender Claims Consultants, Incorporated or at any other location (including Coral Springs, Florida) on the agency's behalf.
2. Any and all monthly bank statements for which accounts hold fiduciary funds for Contender Claims Consultants, Incorporated within the period August 1, 2017 to present.

You must comply with this subpoena by producing these materials **INSTANTER** to **Glenn Chapter, Special Investigator, Florida Department of Financial Services, Bureau of Investigation, or any other Department of Financial Services authorized representative.**

Refusal to comply with this subpoena may result in the application to the Circuit Court to require compliance. (Section 624.321 (2), Florida Statutes)

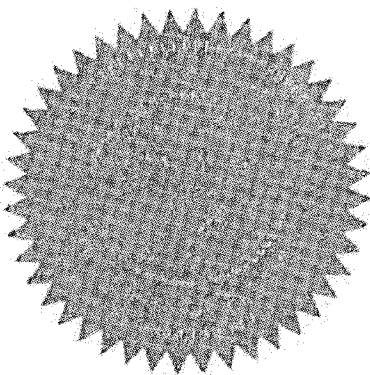
PLEASE BE GOVERNED ACCORDINGLY.

WITNESS: Jimmy Patronis
Chief Financial Officer
The Capitol
Tallahassee, Florida 32399-0300

BY: 

Gregory Thomas
Director, Insurance Agent and Agency Services

DATE: October 1, 2019



Florida Elite Process Service, Inc.
P.O. Box 557403
Miami, FL 33255-7403
Phone: 7-8755
Fax: (305) 771-7111
77-0719884

INVOICE

Invoice #FEP-2019000728
10/4/2019

CHRISTOPHER McGuire
FLORIDA DEPARTMENT OF FINANCIAL SERVICES
1400 COMMERCIAL BLVD.
SUITE 135
FT. LAUDERDALE, FL 33309-3792

Case Number: Miami-Dade MC-3967635-CA-31713

Plaintiff:
IN THE MATTER OF: NICOLA FARIDE GRADOS.,

Defendant:

Received: 10/2/2019 Served: 10/3/2019 11:24 am CORPORATE - EMPLOYEE
To be served on: RC/ THE STREMS LAW FIRM, P.A. Attn: Person Most knowledgeable

ITEMIZED LISTING

Line Item	Quantity	Price	Amount
Service Fee (Local)	1.00	90.00	90.00
TOTAL CHARGED:			\$90.00
10/4/2019 CC **card Final Payment			90.00
BALANCE DUE:			\$0.00

Thank you for your business!

Please enclose a copy of this invoice with your payment. There will be a 3.5% fee per credit card transaction.
PAYMENT IS NOT CONTINGENT UPON REIMBURSEMENT FROM CLIENT.
PAYMENT DUE UPON RECEIPT. A late fee of \$40.00 will be charged for invoices that remain unpaid passed sixty (60) days. If Florida Elite Process Service, Inc. is forced to commence collection practices against client, client will be responsible for costs and attorney's fees incurred by FEPSI, and FEPSI will charge interest at the rate of 10% per annum on invoices outstanding passed ninety (90) days.

RETURN OF SERVICE

State of Florida

County of Miami-Dade

Circuit Court Court

Case Number: MC-3967635-CA-31713

Plaintiff:

IN THE MATTER OF: NICOLA FARIDE GRADOS.,

vs.

Defendant:

For:

CHRISTOPHER McGuire
FLORIDA DEPARTMENT OF FINANCIAL SERVICES
1400 COMMERCIAL BLVD.
SUITE 135
FT.LAUDERDALE, FL 33309-3792



FEP2019000728

Received by Florida Elite Process Service, Inc. on the 2nd day of October, 2019 at 1:03 pm to be served on **RC/ THE STREMS LAW FIRM, P.A. Attn: Person Most knowledgeable, 2525 PONCE DE LEON BLVD., SUITE 600, CORAL GABLES, FL 33134.**

I, Albert Arriera, do hereby affirm that on the **3rd day of October, 2019 at 11:24 am, I:**

served a **CORPORATION** by delivering a true copy of the **INVESTIGATIVE SUBPOENA** with the date and hour of service endorsed thereon by me, to: **Cynthia Montoya as Chief Operating Officer**, an employee who is authorized to accept service for **RC/ THE STREMS LAW FIRM, P.A. Attn: Person Most knowledgeable** in the absence of the Registered Agent, President, Vice President, Secretary, Treasurer, or any other corporate officer at the address of: **2525 PONCE DE LEON BLVD., SUITE 600, CORAL GABLES, FL 33134**, and informed said person of the contents therein, in compliance F.S. 48.081(3)(a).

Description of Person Served: Age: 40, Sex: F, Race/Skin Color: Hispanic, Height: 5'8", Weight: 200, Hair: Dark Brown, Glasses: N

I certify that I am over the age of 18 and have no interest in the above action. Under penalty of perjury, I declare that I have read the foregoing and that the facts stated in it are true. **NO NOTARY REQUIRED PURSUANT TO F.S. 92.525 (2)**

A handwritten signature in black ink, appearing to read 'Albert Arriera', written over a horizontal line.

Albert Arriera
Process Server

Florida Elite Process Service, Inc.
P.O. Box 557403
Miami, FL 33255-7403
-8755

Our Job Serial Number: FEP-2019000728



MARIN ELJAIK | LOPEZ MARTINEZ

Anthony M. Lopez
AML@mellawyers.com

October 14, 2019

Via Certified Mail

#9590 9402 4676 8323 5629 49

Florida Department of Financial Services
200 East Gaines Street
Tallahassee, FL 32399

**Re: Nicola Faride Grados
Case No.: MC-3967635/CA-317-13
Response to Investigative Subpoena**

To Whom it May Concern:

In response to your request dated October 1, 2019 delivered to our firm on October 3, 2019 to produce the materials listed in paragraphs one and two, Marin, Eljaiek, Lopez & Martinez P.L. is not in possession of the following materials listed:

1. All Contender Claims Consultants, Incorporated, agency papers and electronic records pertaining to insurance adjusting or the effectuating of insurance adjusting transactions by Mr. Nicola Faride Grados and Mr. Miguel Angel Grados, which have taken place at any location (including Coral Springs, Florida) within the period August 1, 2017, to present in order to verify records are maintained in accordance with the Florida Statutes. Such records include, but are not limited to: public adjuster agreements, emails, contingent fee retainer agreements and statements of client's rights, receipts from insureds, claims files, computer transactions lists, insurance company communications, applications, Declaration pages, however maintained, which are in the possession and control or, or maintained by Contender Claims Consultants, Incorporated or at any other location (including Coral Springs, Florida) on the agency's behalf.

Answer: **None.**

2. Any and all monthly bank statements or which accounts hold fiduciary funds for Contender Claims Consultants, Incorporated within the period August 1, 2017 to present.

Answer: **None.**

Attached is the Investigation Subpoena for ease of reference. You may contact our office should you have any questions. Thank you for your attention to this matter.

Respectfully submitted,

Anthony M. Lopez

2019 OCT 30 AM 9:13



**STATE OF FLORIDA
DEPARTMENT OF FINANCIAL SERVICES**



Jimmy Patronis
Chief Financial Officer of Florida

10/3/19
11:50 AM
AR-

IN THE MATTER OF:

Nicola Faride Grados
Case No.: MC-3967635/CA-31713

**Investigation and
Inspection of Records**

INVESTIGATIVE SUBPOENA

TO: Marin, Eljaiek, Lopez & Martinez, P.L.
Records Custodian and/or Person Most Knowledgeable
2601 South Bayshore Drive, 18th Floor
Coconut Grove, Florida 33133

Pursuant to the authority contained in Sections 624.307, 624.310, 624.317, 624.318, 624.321, 626.561, 626.601, 626.875, and 626.9561, Florida Statutes, The Florida Department of Financial Services is conducting an investigation and an examination in the above-styled matter to determine the existence of any violation of the Florida Insurance Code.

YOU ARE, THEREFORE, COMMANDED to produce to the Florida Department of Financial Services investigator for investigation, examination, inspection and photocopying the following:

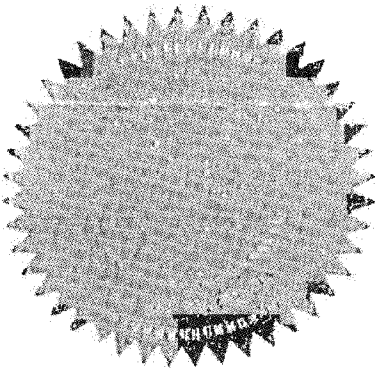
1. All Contender Claims Consultants, Incorporated, agency papers and electronic records pertaining to insurance adjusting or the effectuating of insurance adjusting transactions by Mr. Nicola Faride Grados and Mr. Miguel Angel Grados, which have taken place at any location (including Coral Springs, Florida) within the period August 1, 2017, to present in order to verify records are maintained in accordance with the Florida Statutes. Such records include, but are not limited to: public adjuster agreements, emails, contingent fee retainer agreements and statements of client's rights, receipts from insureds, claims files, computer transactions lists, insurance company communications, applications, Declarations pages, however maintained, which are in the possession and control or, or maintained by Contender Claims Consultants, Incorporated or at any other location (including Coral Springs, Florida) on the agency's behalf.
2. Any and all monthly bank statements for which accounts hold fiduciary funds for Contender Claims Consultants, Incorporated within the period August 1, 2017 to present.

You must comply with this subpoena by producing these materials **INSTANTER** to **Glenn Chapter, Special Investigator, Florida Department of Financial Services, Bureau of Investigation, or any other Department of Financial Services authorized representative.**

Refusal to comply with this subpoena may result in the application to the Circuit Court to require compliance. (Section 624.321 (2), Florida Statutes)

PLEASE BE GOVERNED ACCORDINGLY.

WITNESS: Jimmy Patronis
Chief Financial Officer
The Capitol
Tallahassee, Florida 32399-0300



BY: 

Gregory Thomas
Director, Insurance Agent and Agency Services

DATE: October 1, 2019