**STATE OF NORTH DAKOTA**

**BEFORE THE INSURANCE COMMISSIONER**

| | | |
|---|---|---|
| **In the Matter of** | ) | |
| | ) | **ORDER REVOKING LICENSE** |
| **David R. Bjork,** | ) | |
| **NPN 5740131,** | ) | **CASE NO. AG-15-558** |
| | ) | |
| **Respondent.** | ) | |

**TO: David R. Bjork, 433 Arabian Place, Bismarck, ND 58503**

Insurance Commissioner Adam Hamm ("Commissioner") has determined as follows:

1. The Commissioner has authority in this matter pursuant to N.D.C.C. § 26.1-26-15, which states:

> **License requirement - Character.** An applicant for any license under this chapter must be deemed by the commissioner to be competent, trustworthy, financially responsible, and of good personal and business reputation.

2. David R. Bjork, NPN 5740131 (hereinafter "Respondent"), holds a North Dakota resident insurance producer license issued under N.D.C.C. ch. 26.1-26.

3. N.D.C.C. § 26.1-26-42 states, in part:

> **26.1-26-42. License suspension, revocation, or refusal - Grounds.** The commissioner may suspend, revoke, place on probation, or refuse to continue or refuse to issue any license issued under this chapter if, after notice to the licensee and hearing, the commissioner finds as to the licensee any of the following conditions:
>
> . . .
>
> 6. In the conduct of affairs under the license, the licensee has used fraudulent, coercive, or dishonest practices, or has shown oneself to be

incompetent, untrustworthy, or financially irresponsible.

. . .

12. A violation of or noncompliance with any insurance laws of this state or a violation of or noncompliance with any lawful rules or orders of the commissioner or of a commissioner of another state.

. . .

14. The applicant or licensee has refused to respond within twenty days to a written request by the commissioner for information regarding any potential violation of this section. . . .

4. N.D. Admin. Code § 45-02-02-14.1 states:

> **45-02-02-14.1. Client loans to licensed producers and consultants prohibited - Exceptions**. A licensed insurance producer or consultant may not solicit or accept a loan from an individual with whom the insurance producer or consultant came into contact in the course of the person's insurance business, or sold an insurance policy to, within the past ten years. This does not prohibit a licensed insurance producer or consultant from accepting loans from financial institutions; immediate family members, which shall mean only a spouse, parents, siblings, and children; or other loans upon the prior written approval of the insurance commissioner.

5. On September 20, 2013, the North Dakota Insurance Department ("Department") received an application for reinstatement of Respondent's North Dakota resident insurance producer license.

6. Respondent's September 20, 2013, application required disclosure of any administrative actions regarding any professional or occupational license or registration, and Respondent failed to disclose on the application he had entered into a Consent Order with the North Dakota Securities Department in 1999. Additionally, a background check conducted by Department employees revealed Respondent had an outstanding judgment of approximately $11,150.82. Respondent's failure to disclose the 1999 Consent Order and his

$11,150.82 unpaid judgment were sufficient grounds to deny his September 20, 2013, application. Rather than deny Respondent's September 20, 2013, application, in a letter dated October 4, 2013, the Department offered Respondent the opportunity to agree to a conditional license.

7. On October 7, 2013, Respondent entered into a Conditional License Agreement with the Department, and Respondent was issued a conditional North Dakota insurance producer license on October 9, 2013. A copy of the signed Conditional License Agreement is attached to this Order as Exhibit 1.

8. The October 7, 2013, Conditional License Agreement stated in part:

> Notwithstanding the administrative action and financial history, The Department will agree to offer you a conditional license. In consideration of your execution of this agreement and in consideration for the Department agreeing not to deny a license to you, the Department will issue a resident individual insurance producer license with the Following conditions:
>
> 1. A conditional license will be issued with a probationary period to run 24 months from the date of issuance of the license. If, at the end of the probationary period, there is no cause to terminate the license, an unrestricted license will be issued.
>
> 2. You must during the time of this probation and at all times after that fully comply with all the laws of the state and lawful orders of the Insurance Commissioner . . . .
>
> 3. The Department can revoke, suspend, or take such further action against the license as may be deemed necessary in the Commissioner's discretion without notice of hearing or issuance of a complaint, if the Department receives information that you have had a collection action initiated against you or your have been charged with a crime or convicted of a crime at any time which resulted from a charge that was filed during the probationary period, or the Department receives a complaint from any source against you and after investigation of the

> merits of the charge, conviction, or complaint and after you have been afforded the opportunity to respond in writing, and after review of other factual information necessary, the commissioner concludes that you violated the laws of the State of North Dakota or used fraudulent, coercive, or dishonest practices or are incompetent, untrustworthy, or financially irresponsible.
>
> . . .
>
> 5. You may not handle funds in any insurance-related employment. During the time of your probation, you must notify the Department within three business days if you leave your current employment. . . .

9. On or about February 25, 2015, L. Bitz filed a complaint with the Department alleging the Respondent inappropriately advised her to make significant surrenders from two of her Transamerica Life Insurance Company annuities and purchase a Hartford life insurance policy.

10. On or about March 13, 2015, L. Bitz filed a complaint with the Department alleging the Respondent borrowed $7,500 from her and failed to pay it back. L. Bitz provided a copy of the $7,500 check negotiated by Respondent. A copy of the negotiated check is attached to this Order as Exhibit 2.

11. Employees of the North Dakota Insurance Department investigated the allegations made by L. Bitz and the Respondent's activities.

12. On October 16, 2014, a letter was mailed from the Department to the Respondent requesting information relating to L. Bitz's annuities and the loan of $7,500. Respondent failed to respond to the October 16, 2014, letter. A copy of the October 16, 2014, letter is attached to this Order as Exhibit 3.

13. On November 21, 2014, a letter was sent by U.S. Post, Certified Mail, to Respondent requesting information relating to L. Bitz's annuities, the loan of $7,500 and an

explanation as to his failure to respond to the October 16, 2014, letter. Respondent failed to respond to the November 21, 2014, letter. A copy of the November 21, 2014, letter is attached to this Order as Exhibit 4.

14. In an email dated January 6, 2015, the Department was notified that Respondent was suspended from work by his employer, Capital Financial Services, Inc. on January 1, 2014, and his employer was unable to contact Respondent. A copy of the January 6, 2015, email is attached to this Order as Exhibit 5.

15. Respondent's failure to respond to the Department's October 16, 2014, and November 21, 2014, letters are each individually violations of N.D.C.C. § 26.1-26-42(14), and are individual violations of his Conditional License Agreement.

16. Respondent's accepting a loan from his insurance client, L. Bitz, is a violation of N.D.C.C. § 26.1-26-42(12) and N.D. Admin. Rule § 45-02-02-14.1 and is a violation of his Conditional License Agreement.

17. Respondent's failure to cooperate with the Department's investigation into the allegations made against him, failure to respond to the Department's inquires and failing to repay the loan he accepted from his client, L. Bitz, show him to be untrustworthy and financially irresponsible, and are violations of N.D.C.C. §§ 26.1-26-15 and 26.1-26-42(6), and are violations of his Conditional License Agreement.

18. Respondent's failure to contact the Department within three days of being suspended from work at Capital Financial Services, Inc. is a violation of his Conditional License Agreement.

NOW, THEREFORE, IT IS HEREBY ORDERED that Respondent having agreed to revocation of his license in the discretion of the Commissioner without notice of hearing or issuance of a complaint if the Commissioner finds Respondent has not fully complied with the laws of the state or the terms of his Conditional License Agreement, or if the

Commissioner concludes, after investigation and opportunity to respond, a complaint against Respondent is meritorious and the Commissioner concludes that Respondent is incompetent, untrustworthy, and financially irresponsible; and the Commissioner having found that Respondent has not fully complied with the laws of the state and Respondent has violated the terms of his Conditional License Agreement, and the Commissioner, after investigation and opportunity to respond, having concluded a complaint filed against Respondent is meritorious and Respondent is incompetent, untrustworthy, and financially irresponsible; and in accordance with the terms of the Conditional License Agreement signed by Respondent, Respondent's North Dakota resident insurance producer license is hereby **REVOKED**.

This Order is effective this 18th day of August, 2015.

Adam Hamm
Commissioner
N.D. Insurance Department
600 East Boulevard Avenue
Bismarck, ND 58505
(701) 328-2440

North Dakota
Insurance Department
Adam Hamm, Commissioner

October 4, 2013

Mr. David Bjork
433 Arabian Place
Bismarck, ND 58503

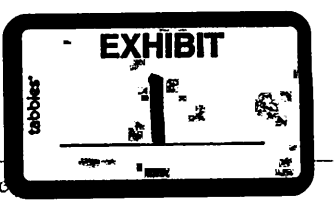
RE: Conditional License Agreement

Dear Mr. Bjork:

The North Dakota Insurance Department has recently concluded its evaluation of your application received on September 20, 2013, for reinstatement of a resident individual insurance producer license. In that application you answered "no" to background question two regarding whether you have ever been named or involved as a party in an administrative proceeding including FINRA sanction or arbitration proceedings regarding any professional or occupational license or registration. A check of records revealed that you entered into a Consent Order and paid a $5,000 fine for a North Dakota Securities regulatory action in 1999. A check of court records also revealed you have an outstanding judgment against you of approximately $11,150.82.

Your administrative action and financial history are grounds for denial of your application. State law provides that the Commissioner may deny a license if an applicant has been convicted of a felony or convicted of an offense determined by the Commissioner to have a direct bearing upon a person's ability to serve the public as an insurance producer. N.D.C.C. § 26.1-26-42(1), (2), (5). In addition, an applicant for an insurance producer license must be deemed by the Commissioner to be competent, trustworthy, financially responsible, and of good personal and business reputation. N.D.C.C. § 26.1-26-15. A violation of these laws is subject to a civil fine of up to $10,000. N.D.C.C. § 26.1-26-50.

Notwithstanding the administrative action and financial history, the Department will agree to offer you a conditional license. In consideration of your execution of this agreement and in consideration of the Department agreeing not to deny a license to you, the Department will issue a resident individual insurance producer license with the following conditions:

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1. A conditional license will be issued with a probationary period to run 24 months from the date of issuance of the license. If, at the end of the probationary period, there is no cause to terminate the license, an unrestricted license will be issued.

2. You must during the time of this probation and at all times after that fully comply with all the laws of the state and lawful orders of the Insurance Commissioner. You will be allowed to maintain this conditional license for 24 months if you have no collection actions initiated or judgments entered against you and no criminal charges or convictions filed during the conditional period that at any time lead to a criminal conviction. Sixty-one days after expiration of this probation, the license will still be conditional so that we can check court records to determine whether you completed probation successfully.

3. The Department can revoke, suspend, or take such further action against the license as may be deemed necessary in the Commissioner's discretion without notice of hearing or issuance of a complaint, if the Department receives information that you have had a collection action initiated against you or you have been charged with a crime or convicted of a crime at any time which resulted from a charge that was filed during the probationary period, or the Department receives a complaint from any source against you and after investigation of the merits of the charge, conviction, or complaint and after you have been afforded the opportunity to respond in writing, and after review of other factual information necessary, the Commissioner concludes that you violated the laws of the State of North Dakota or used fraudulent, coercive, or dishonest practices or are incompetent, untrustworthy, or financially irresponsible.

4. During the time of the probation, you shall report to the Department within three business days after an action to collect money or a criminal charge is filed, any further collection action, criminal charge, or criminal conviction in any jurisdiction except for minor traffic offenses.

5. You may not handle funds in any insurance-related employment. During the time of your probation, you must notify the Department within three business days if you leave your current employment.

6. You must notify the Department within three business days of any checks you write that are returned for insufficient funds, whether or not it results in a criminal charge.

7. The judgment must be paid in full by the end of the probationary period before an unrestricted license will be issued.

**Please be advised that the issuance of the conditional license will result in a report to the National Insurance Producer Registry (NIPR) Producer Database (PDB) as an administrative action.**

If you are in agreement with the conditions described above, please sign below, have your signature notarized, and return the agreement to the Department. After receipt of this signed and notarized agreement, the Department will then issue a conditional license. **This offer is valid for only 20 days from the date of this letter.** If we have not received your signature within that time frame, the application will be denied.

Sincerely,

Jeff Ubben
General Counsel

JU/njb

I voluntarily agree to the entirety of the conditions as set out in this License Agreement.

DATED this 7 day of October, 2013.

David Bjork

Subscribed and sworn to before me this 7th day of October, 2013.

Notary Public

State of North Dakota
County of Burleigh

My Commission Expires: Dec 8, 2016

KRISTEN BUTLER
Notary Public
State of North Dakota
My Commission Expires Dec. 8, 2016

LEONA M BITZ
339 VERSAILLES
BISMARCK, ND 58503
701-225-1417

9176
77-7813/2913

4-10-12
Date

Pay to the Order of David Bjork $ 7,500

Seven thousand 500 and no/100 Dollars

Security Features Details on back.

Capital Credit Union
204 West Thayer Avenue
P.O. Box 2096 Phone 255-0042
Bismarck, North Dakota 58502-2096
www.capcu.org

For

Leona M. Bitz

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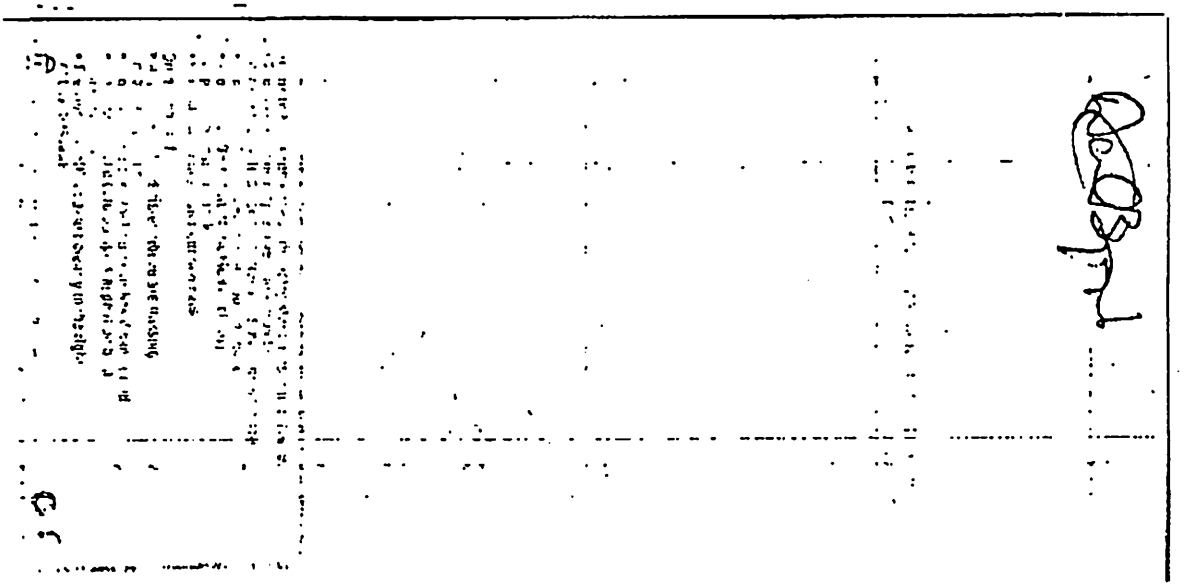

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DEC 31 2014
NORTH DAKOTA INSURANCE DEPARTMENT

EXHIBIT
2

North Dakota
Insurance Department
Adam Hamm, Commissioner

October 16, 2014

Mr. David Bjork
433 Arabian Place
Bismarck, ND 58503

RE: Leona Bitz Complaint
Policies: Transamerica 117076LK8; Hartford U01980179

Dear Mr. Bjork:

I am writing in regard to a complaint filed with the Insurance Department by Mrs. Leona Bitz dated February 25, 2014. I continue to work with Mrs. Bitz and her new accountant to get a better understanding of her complaint. At this time I have some follow up questions for you. Please provide **detailed** explanations to each and all of the following individual requests:

1. Mrs. Bitz informed the Department that she wrote you a check for $7,500 on April 10, 2012, related to a business venture, and this money has never been returned. Although this is not directly related to the initial complaint, the North Dakota insurance code has statutes concerning financial responsibility of producers.

   a. Please explain in detail the nature of this matter, including why you have not repaid Mrs. Bitz.

2. Accompanying this letter is a copy of your letter dated March 18, 2014, in response to Mrs. Bitz's complaint. In the letter you wrote:

   "At the end of 2010 & after Irv's passing, what his nursing home costs had been became a topic of concern for Leona and she speculated how it would impact her if she had to also be admitted to one. She said the thought of losing everything was very much a concern and even kept her up at night. She didn't believe she would qualify for any nursing home insurance as she had previously experienced some health issues (by-pass surgery), which also gave her concerns. I told her I could look into it if she wanted, which she said she wanted me to do. We reviewed her

EXHIBIT
3

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assets; some were providing a monthly income and others were designated for emergencies or expenses for the future, such as her VA. She told me she would like to see if she qualified, and if she did, getting nursing home insurance was now a priority she hadn't really considered before."

a. In your written responses, including the March 18 letter, you never mention the nursing care benefits (withdrawal option) included in the Transamerica annuity contracts that Mrs. Bitz already had in place prior to the sale of the Hartford UL policy. Accompanying this letter is the portion of the Transamerica contract defining the nursing care and terminal condition coverage withdrawal option. You may have been unaware or overlooked this coverage, but please provide a detailed explanation regarding why you did not discuss the Transamerica annuity nursing care and terminal condition withdrawal option with Mrs. Bitz or why it was overlooked?

b. As acknowledged in your March 18, 2014, letter, Mrs. Bitz's husband was admitted to a nursing home after the purchased of the Transamerica annuities. Please provide a detailed explanation of any withdrawals from Mrs. Bitz's Transamerica annuities to cover any of Mr. Bitz's nursing care expenses?

c. If no withdrawals were made from Mrs. Bitz's Transamerica annuities to cover any of Mr. Bitz's nursing care expenses, such as the "out of pocket" expenses referenced in your March 18, 2014, letter, please provide a detailed account of why Transamerica nursing care withdrawals were not made and other funds were used to cover Mr. Bitz's expenses?

3. Under the terms of the Transamerica annuity contract, the nursing care and terminal condition withdrawal option requires the owner to be confined for 30 days or diagnosed with a terminal condition in order to initiate the withdrawal option. However, the Hartford Lifeaccess Accelerated Benefit Rider requires the insured to be "certified by a licensed health care practitioner" as meeting certain thresholds for assistance with "activities for daily living" prior to qualify for the nursing care benefit. Additionally, the Hartford UL contract grants Hartford the right to periodically review the insured's medical condition and end the nursing care payments. When comparing the Transamerica contract terms to the Hartford rider terms, the threshold for meeting the nursing care benefits is lower for the Transamerica annuity than the terms of the Hartford rider. In other words, Mrs. Bitz's qualifying illness would need to be "certified" and present

obstacles to her daily living in order for her to qualify for the Hartford nursing care benefits, which are not requirements of the Transamerica annuity.

a. Provide a detailed explanation regarding how you determined the Transamerica annuity was not sufficient to meet Mrs. Bitz's nursing care needs.

b. Considering the Hartford Lifeaccess rider requires Mrs. Bitz to meet a higher threshold of need before becoming eligible for benefits, provide a detailed explanation of how you determined the Hartford rider benefits warranted an almost complete surrender of the Transamerica annuity that already offered nursing care benefits with a lower threshold of qualification, historically provided investment growth for Mrs. Bitz, and maintained her access to liquid assets in case of emergency.

4. The Hartford Lifeaccess Accelerated Benefit Rider terms limit the nursing care benefits to a maximum monthly benefit of 2% of the face amount, so initially $5,140.84 per month. Because of this limitation it would take Mrs. Bitz approximately six years to collect benefits equal to the $199,946.97 which she already had immediately available for nursing care under the terms of Transamerica annuity. This was not mentioned in your responses to the complaint or to Mrs. Bitz?

a. Please explain in detail why you did not explain the 2% Maximum Monthly benefit amount limitation of the Hartford rider to Mrs. Bitz.

b. Mrs. Bitz must continue to pay $5,000 per year in premium to maintain the full benefits of the Hartford rider nursing care coverage. When considering the maximum monthly benefit amount limitation of 2% of the face amount, Mrs. Bitz would be required to pay an additional $30,000 ($5,000 per year for six years) in premium to collect benefits equal to the nursing care benefits that were already available under the Transamerica annuity. Based on your response and Mrs. Bitz's recounting, this was never mentioned to Mrs. Bitz. Please explain in detail why you did not explain this to Mrs. Bitz.

5. Mrs. Bitz incurred surrender and tax penalties to purchase the Hartford policy. The July 25, 2011, $166,697.32 distribution resulted in an $11,697.32 surrender penalty and $19,091 in tax owed to the IRS—meaning over $32,000 in taxes and surrender penalties combined. In your March 18, 2014, letter in response to Mrs. Bitz's complaint you wrote "if

we were to fund this UL that way, there would be a partial surrender charge as well as taxes owed, but for the premium, she would receive a face amount for long-term care coverage or death benefit over $100,000 more than her premium."

a. When considering taxes and penalties of approximately $32,000 and the $30,000 in premium required to be paid over the six years of maximum distributions of 2% of the face amount of the Hartford policy, please explain in detail how you determined Mrs. Bitz gained a $100,000 long-term care coverage more than her premium? If you failed to consider the 2% of face amount maximum distribution, please explain why you failed to include this in your previous responses?

4. Mrs. Bitz's yearly gross income stated on the Hartford UL application is $36,000. At the time of the sale of the Hartford UL you were acting as Mrs. Bitz's financial advisor.

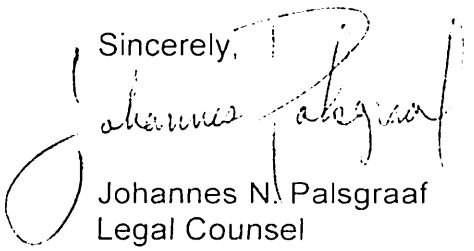
   a. Please explain how you determined Mrs. Bitz's gross income amounted to $36,000.

   b. Considering the $5,000 annual premium for the Hartford policy was approximately 13.9% of Mrs. Bitz's yearly income, please explain how you determined the Hartford policy was financially suitable for Mrs. Bitz.

5. Considering all of the benefits of the Transamerica annuity (including the availability of liquid assets) as compared to the Hartford policy, please explain how you determined that the Hartford policy was more suitable for Mrs. Bitz's needs.

Thank you for your cooperation. I anticipate receipt of your written reply within 20 days from your receipt of this letter, as required by North Dakota statute.

Sincerely,



Johannes N. Palsgraaf
Legal Counsel

JNP/njb

Enclosures

North Dakota
Insurance Department
Adam W. Hamm, Commissioner

**CERTIFIED MAIL**

November 21, 2014

Mr. David Bjork
433 Arabian Place
Bismarck, ND 58503

RE: Leona Bitz Complaint
Policies: Transamerica 117076LK8; Hartford U01980179

Dear Mr. Bjork:

On behalf of the North Dakota Insurance Commissioner, I have attempted to contact you at your address on file with the Department: 433 ARABIAN PL, BISMARCK, ND 58503. My correspondence expressed a response due within 20 business days of receipt of the letter, and the letter was sent by regular postal mail on October 16, 2014. To date we have not received your reply to the request for information. Please respond to my original letter immediately and provide an explanation as to why you have failed to respond within the appropriate time period. A copy of my October 16, 2014, letter with enclosures is included with this letter.

Please be aware that N.D.C.C. § 26.1-26-42 permits the Commissioner to take regulatory action against a licensee failing to respond within 20 days to a request regarding a potential violation. Additionally N.D.C.C. § 26.1-26-33 requires licensees to notify the Department of an address change within 30 days of the change. Failure to notify the Department of an address change with 30 days is also sufficient grounds to take action against a licensee. I have provided the applicable statutes below.

> **26.1-26-42. License suspension, revocation, or refusal—Grounds.** The commissioner may suspend, revoke, place on probation, or refuse to continue or refuse to issue any license issued under this chapter if, after notice to the licensee and hearing, the commissioner finds as to the licensee any of the following conditions:
>
> . . .

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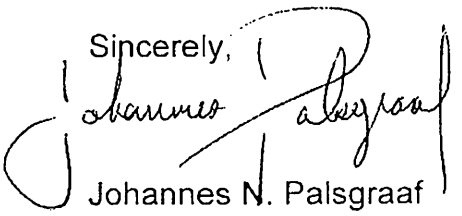
14. The applicant or licensee has refused to respond within twenty days to a written request by the commissioner for information regarding any potential violation of this section.

**26.1-26-33. Notification of address change--Duty of licensee.** Every licensee shall notify the commissioner of any change in the licensee's residential or business address or legal name within thirty days of the change. Any licensee who ceases to maintain residency in this state shall deliver the insurance license to the commissioner by personal delivery or by mail within thirty days after terminating residency.

Sincerely,



Johannes N. Palsgraaf
Legal Counsel

JNP/njb
Enclosures

## Palsgraaf, Johnny N.

**From:** John Carlson <jcarlson@cfsbd.com>
**Sent:** Tuesday, January 06, 2015 3:09 PM
**To:** Palsgraaf, Johnny N.
**Subject:** RE: David Bjork inquiry regarding Transamerica 117076LK8; Hartford U01980179

Mr. Palsgraaf,

After numerous attempts to contact Mr. Bjork, we received no reply. Mr. Bjork was suspended by the firm on January 1 for failing to complete his firm element continuing education for 2014.

John Carlson
Chief Compliance Officer

Securities and Investment Advice Offered Through
Capital Financial Services, Inc.
1 Main St. N, Minot, ND 58703 (701) 837-9600
Broker-Dealer / Investment Adviser
Member FINRA & SIPC

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**From:** Palsgraaf, Johnny N. [mailto:jpalsgraaf@nd.gov]
**Sent:** Tuesday, January 06, 2015 1:23 PM
**To:** John Carlson
**Subject:** FW: David Bjork inquiry regarding Transamerica 117076LK8; Hartford U01980179

Mr. Carlson,
Would you please give me an update regarding your efforts to contact Mr. Bjork regarding the attached letter? If you have been able to speak with Mr. Bjork or receive any response from him, would you please include that information in your response to this email.
Thanks again for your assistance in this matter.
Sincerely,

Johannes (Johnny) Palsgraaf
Legal Counsel
North Dakota Insurance Department
600 East Boulevard Avenue
State Capitol - Fifth Floor
Bismarck, ND 58505
Ph. (701) 328-2577
Fax (701) 328-4880
jpalsgraaf@nd.gov

**From:** Palsgraaf, Johnny N.
**Sent:** Tuesday, December 30, 2014 2:47 PM
**To:** 'jcarlson@cfsbd.com'
**Subject:** David Bjork inquiry regarding Transamerica 117076LK8; Hartford U01980179

Mr. Carlson,

Thank you for assisting me in this matter. Attached is a copy of the Department's November 21, 2014 letter to Mr. Bjork regarding his failure to respond to the Department's inquires. The Department did receive a receipt of delivery for the attached letter that appears to be signed my Mr. Bjork, but we still have not had any response. Please see if you can get in contact with Mr. Bjork and express the seriousness of this matter.

Sincerely,

Johannes (Johnny) Palsgraaf
Legal Counsel
North Dakota Insurance Department
600 East Boulevard Avenue
State Capitol - Fifth Floor
Bismarck, ND 58505
Ph. (701) 328-2577
Fax (701) 328-4880
jpalsgraaf@nd.gov