

**IN THE MATTER OF THE
MARYLAND INSURANCE
ADMINISTRATION**

v.

**YOUN-FAA OLIVER MYLES
3855 Route 97
Glenwood, MD 21738**

and

**CONCEPTS RESPONSE LLC
P.O. Box 3,
Glenwood, MD 21738**

*** BEFORE THE MARYLAND
* INSURANCE COMMISSIONER

CASE NO.: MIA-2026-03-025

CASE NO.: MIA-2026-03-026

Fraud Division File No.: T-2025-317291

ORDER

This Order is issue by the Maryland Insurance Administration (the “Administration”) against Youn-faa Oliver Myles (“Myles”) and Concepts Response LLC (“C.R.”) (collectively “Respondents”) pursuant to Md. Code Ann., Ins. Art. §§ 2-108, 2-201, 2-204, and 2-405 of the Insurance Article, Md. Code Ann. (2017 Repl. Vol. & Supp.) ¹(“Insurance Article”).

I. FACTS

1. A public adjuster is defined in the Insurance Article to include a person who, for compensation, acts for or assists a policyholder in assessing the value of, negotiating for, or effecting the settlement of a first property insurance claim under a property and casualty policy that insures the policyholder’s real or personal property. *See* § 10-401(g)(1). A person is required to be licensed to act as a public adjuster in the State. *See* § 10-403(a).

2. Myles is a resident of Maryland with an address of 3855 Route 97, Glenwood, MD 21738. On July 1, 2011, Myles became licensed as a public adjuster. By consent, Myles’s license was sanctioned on February 14, 2013 because, *inter alia*, he falsely advertised on the internet that his

¹ Unless otherwise indicated, all statutory references in this order are to the Insurance Article of the Maryland Code.

company, C.R., was “an extended arm of the Administration to uphold insurance industry integrity....” *See MIA v. Myles*, Case No.: MIA-2013-02-018. On December 31, 2023, Myles’s license expired.

3. C.R. is a Maryland LLC owned by Myles. Its business address of record is 3855 Route 97, Glenwood, MD 21738. C.R. was never licensed by the Administration.²

4. On March 5, 2024, Myles emailed the Administration and requested confirmation that a lawyer may conduct business as a public adjuster without being licensed as such. In his email, Myles represented: “I am a former licensed Public Adjuster, but now have become a lawyer.” By email dated March 6, 2024, the Administration provided Myles with the applicable law (Ins. Art. §§ 10-401, 10-402, and 10-403) and informed Myles that there are limited licensing exceptions for licensed attorneys to conduct business as public adjusters.

5. By email dated March 7, 2024, Myles claimed that he is not subject to Maryland jurisdiction and Maryland law does not apply to him. In a follow-up email to Myles dated March 8, 2024, the Administration wrote:

Hello Mr. Myles,

In Maryland, a person must obtain a Public Adjuster license, issued by the Maryland Insurance Administration, before the person acts as a public adjuster in the State. There are certain license exemptions for attorneys who do not regularly act as public adjusters and represent to the public by sign, advertisement, or otherwise that the attorney at law acts as a public adjuster.

6. In September of 2025, Myles contacted the Administration and requested a review of the website of his company, C.R. to ensure compliance with applicable laws and licensure. The

² Myles is also linked to C.R. through a Howard County Civil Court Contract- Large Claims case in September of 2022, listing Myles and C.R. as defendants in a lawsuit filed by American Express National Bank.

website Myles provided—www.conceptsresponse.com (“C.R. Website” or “Website”)—claims on the homepage that customers “Have a **Free*** Review of your Insurance Company Claim Report and Potentially Improve the factors of your Offered Claim Award by a Counselor-at-Law Service.”

7. Additionally the C.R. Website offers the following services:

[C]R offers a straight-forward pathway means whereby a project Client and Client-selected Contractor may use CR (intermediary) escrow service to soon temporarily hold agreed upon project funds for timely Contractor payments via (Maryland) Atlantic Union Bank [tentative]; Have CR review project contract for unforeseen [sic] short-comings; and provide Legal and Engineering recommendations for the project. ...

These services fall within the job functions of a public adjuster, and therefore require proper licensing through the State of Maryland.

8. On September 23, 2025, following Myles’s request for a review of the Website, the Administration sent a letter of warning to Myles indicating that the services described on the Website fall under the definition of public adjuster set forth in § 10-401(g)(1)(i) and require proper licensing through the State of Maryland. Myles was advised to stop advertising and/or providing the services listed on the Website within 30 days of the letter to avoid civil penalties or potential criminal investigation.

9. On October 7, 2025, Myles sent an email to the Administration indicating that the C.R. Website contains several linked documents contending that he is not subject to applicable Maryland laws pertaining to licensure.

10. Rather than deactivating the C.R. Website, on October 28, 2025, Myles added a notation to the top of the C.R. Website stating: “Form Operational, Yet Still Under Final Construction and Testing.”

11. On October 28, 2025, the Administration advised Myles as follows via email:

Mr. Myles,

Your website <https://conceptsresponse.com/> is still active and visible to the public. This is to advise you that if the site remains active on Monday, November 3, 2025, I will open a fraud investigation that could leave you susceptible to administrative and/or criminal penalties.

- 12.** Also on October 28, 2025, the Administration advised Myles as follows via email:

Mr. Myles,

If the site remains active on Monday, November 3, 2025, I will open a fraud investigation that could leave you susceptible to administrative and/or criminal penalties. This is your final warning. I am not going to discuss this issue further.

- 13.** Based on the information provided by Myles, including the document he titled: “Lord Attorney: Related Laws and Perspectives,” it appears that Myles acknowledges that he is not an attorney and that he is not licensed to practice law. Regardless, Myles is not licensed to practice law in Maryland and is not listed as an attorney on the website of the Maryland Courts (<https://www.mdcourts.gov/attysearch>).

- 14.** The C.R. Website was reviewed as part of the Administration’s investigation. As of November 20, 2025, all parts of the C.R. Website remain active and available for public view and usage. This includes links to an Insurance Contract Interface, which allows consumers to register as new clients and access and complete the Concepts Response contract.

- 15.** The “Concepts Response DYBES Contract” available on the C.R. Website lists costs for services rendered by C.R. The cost portion of the contract states:

The sought structure of the above business system process is for the client (if CR accepted) to basically incur no out-of-pocket cost but that the client's “expected” claim award improvement amount is subject to financial transactional costs among parties, (IOLTA+) escrow CR service fee, prior client-email approval for any unique or special circumstantial "outside expert/professional" service cost, and conventional contingency attorney-level service fee (defaulted at 30%, but circumstantially ranging 25% to 40%).

These fees indicate services are being conducted in the area of claims management and negotiation by Respondents in exchange for monetary funds from the insured, in violation of §§ 10-403 and 27-405.

II. LEGAL AUTHORITY

16. In addition to all relevant sections of the Insurance Article, the Administration relies on the following pertinent sections in finding that Respondents violated Maryland's insurance laws:

§ 10-403 provides in pertinent part:

(a) Except as otherwise provided in this subtitle, a person must obtain a license before the person acts as a public adjuster in the State.

§ 27-405 provides in pertinent part:

(a) It is a fraudulent insurance act for a person to act as or represent to the public that the person is:

(1) an insurance producer or a public adjuster in the State if the person has not received the appropriate license under or otherwise complied with Title 10 of this article;

III. CONCLUSIONS OF LAW

17. By the conduct set forth above, Respondents violated the Insurance Article §§ 10-403(a) and 27-405(a) by acting as public adjusters without the requisite licenses to do so, in particular:

- Advertising the services of business Concepts Resolution as a Counselor-At-Law Service with authority to negotiate and transact insurance claims on behalf of insured parties;
- Listing fee schedules for payment of services for claims negotiations with insurance carriers;

18. The public justifiably expects the Administration to ensure that only licensed, competent, and trustworthy public adjusters are permitted to conduct the business of insurance in Maryland. Respondents' conduct violated §§ 10-403 and 27-405(a)(1) of the Insurance Article. Respondents

did not have licenses as required under § 10-403 to act as public adjusters and Myles does not fall within any of the exceptions to the licensure requirement.

IV. SANCTIONS

19. In consideration of the factors set forth in § 27-408(c)(2), the Administration imposes an administrative penalty in the amount of \$1,500.00 against Respondents.

20. Monetary penalties shall be made payable to the Maryland Insurance Administration and shall identify the case by number (T-2025-317291) and name (Youn-Faa Myles and Concepts Response). Payment of the monetary penalty shall be sent to the attention of: Danielle Harris, Fiscal Division, Maryland Insurance Administration, 200 St. Paul Place, Suite 2700, Baltimore, Maryland 21202. This penalty can also be paid by credit card or e-check (ACH) by following this link: <https://insurance.maryland.gov/Pages/Electronic-Administrative-Penalty-Payment.aspx>. If online credit card or e-check (ACH) payment is made, include the case number referred to in this paragraph and select the unit name “Fraud.” Unpaid penalties will be referred to the Central Collections Unit for collection.

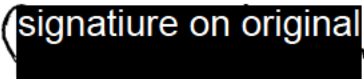
21. This Order does not preclude any potential or pending action by any other person, entity or government authority, regarding any conduct by the Respondent including the conduct that is the subject of this Order.

WHEREFORE, for the reasons set forth above, it is this 27th day of March 2026,
ORDERED that:

- A.** Respondents, jointly and severally, shall pay an administrative penalty of One Thousand Five Hundred Dollars (\$1,500.00) within 30 days of the date of this Order;
- B.** Respondents shall immediately **DISCONTINUE** all business activities in Maryland that fall within the scope of public adjusting activities defined in § 10-401;

- C. Myles shall not operate or maintain a website that holds him or C.R. out as offering services for which a public adjuster license is required;
- D. Respondents shall not make any written agreement or authorization for Respondents to negotiate with an insurance company regarding the value of damages sustained by insured property or insurance coverage in connection with a first-party insurance claim.; and
- E. Respondents shall immediately **DISCONTINUE** holding themselves out as persons or entities qualified to act on behalf of Maryland policyholders' in the facilitating and/or negotiation of insurance coverage.

MARIE GRANT
Insurance Commissioner

BY:  (signature on original)

ROBERT GUYNN
Associate Commissioner
Fraud & Enforcement Division

RIGHT TO REQUEST A HEARING

Pursuant to § 2-210 of the Insurance Article and Code of Maryland Regulations (“COMAR”) 31.02.01.03, an aggrieved person may request a hearing on this Order. This request must be in writing and received by the Commissioner within thirty (30) days of the date of the letter accompanying this Order. However, pursuant to § 2-212 of the Article, the Order shall be stayed pending a hearing only if a demand for hearing is received by the Commissioner within ten (10) days after the Order is served. The request shall include the following information:

- (1) the action or non-action of the Commissioner causing the person requesting the hearing to be aggrieved;
- (2) the facts related to the incident or incidents about which the person requests the Commissioner to act or not act; and
- (3) the ultimate relief requested.

The failure to request a hearing timely or to appear at a scheduled hearing will result in a waiver of your rights to contest this Order and the Order shall be final on its effective date. Please note that if a hearing is requested on this initial Order, the Commissioner may affirm, modify, or nullify an action taken or impose any penalty or remedy authorized by the Insurance Article against the Respondent in a Final Order after hearing.

The written request for hearing must be addressed to the Maryland Insurance Administration, 200 St. Paul Place, Suite 2700, Baltimore, Maryland 21202, Attn: Clerk – Office of Hearings.
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