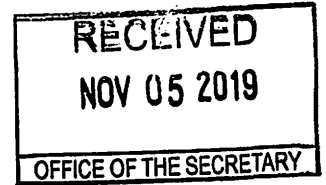


**UNITED STATES OF AMERICA**  
**Before the**  
**SECURITIES AND EXCHANGE COMMISSION**



**ADMINISTRATIVE PROCEEDING**  
**File No. 3-19270**

**In the Matter of**  
  
**Knowledgebroker, Inc., et al.**  
  
**Respondents.**

**DIVISION OF ENFORCEMENT'S MOTION FOR**  
**DEFAULT AND BRIEF IN SUPPORT**

The Division of Enforcement (“Division”), by counsel, pursuant to Commission Rules of Practice Rules 154(a) and 155(a)(2) respectfully moves the Securities and Exchange Commission (“Commission”) for an order entering a default against Knowledgebroker, Inc., (CIK No. 948280) (“Knowledgebroker”), Millers Mutual Fire Insurance Co. (n/k/a Millers American Group, Inc.) (CIK No. 1035978) (“Millers”), and Omega Orthodontics, Inc. (CIK No. 1032628) (“Omega”) (collectively “Respondents”) in this proceeding and ordering the revocation of the registration of each class of Respondents’ securities registered pursuant to Section 12 of the Securities Exchange Act of 1934 (“Exchange Act”).

**Argument**

On July 24, 2019, the Commission issued an Order Instituting Proceedings (“OIP”) against Respondents which have securities registered with the Commission under Section 12(g) of the Exchange Act. The OIP alleges the Respondents are delinquent in filing their mandated periodic reports. Because each of the Respondents failed to answer or otherwise

respond to the OIP, the Division now seeks entry of an order finding respondents Knowledgebroker, Millers and Omega to be in default in this proceeding.

Commission Rule of Practice 220(b) states that where an answer is required to be filed by rule or order, the respondent “shall do so within 20 days after service upon the respondent of the order instituting proceedings” unless a different period is provided by rule or order. Here, the OIP requires “an Answer [to be filed] to the allegations contained in this Order within ten (10) days after service of this Order.” OIP at IV. Commission Rule of Practice 160(a) provides that Saturdays, Sundays and Federal legal holidays are to be counted as part of the 10 day period, and Commission Rule of Practice 160(b) extends that time by three days if service is made by mail.

The Declaration of Gina Joyce to Assist Secretary with Record of Service (attached hereto as Exhibit A) (“Joyce Declaration”) establishes that on August 6, 2019, service upon Knowledgebroker of the OIP, along with a letter from the Commission’s Secretary, and a letter from the Division offering discovery pursuant to Rule of Practice 230 (collectively the “Service Documents”), was attempted by Express Mail delivery at the address provided in its last EDGAR filing with the Commission, in accordance with Commission Rule of Practice 141(a)(2)(ii). Knowledgebroker’s answer to the OIP was due by Monday, August 19, 2019. Knowledgebroker has not filed an answer or made any other response to the OIP in this proceeding.

The Joyce Declaration also establishes that on July 26, 2019, service upon Millers of the Service Documents was attempted by Express Mail delivery at the address provided in its last EDGAR filing with the Commission, in accordance with Commission Rule of Practice

141(a)(2)(ii). Miller's answer was due by Thursday, August 8, 2019. Millers has not filed an answer or made any other response to the OIP in this proceeding.

The Joyce Declaration additionally establishes that on July 29, 2019, service upon Omega of the Service Documents was attempted by Express Mail delivery at the address provided in its last EDGAR filing with the Commission, in accordance with Commission Rule of Practice 141(a)(2)(ii). Omega's answer was due by Monday, August 12, 2019. Omega has not filed an answer or made any other response to the OIP in this proceeding

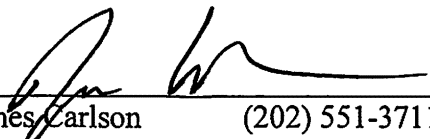
The Respondents at issue are delinquent in their filings with the Commission and have been delinquent for over two years. In addition, the Respondents' failure to answer supports revocation of the registration of each class of the Respondents' securities. Accordingly, the Division moves for an order, pursuant to Rule 155(a)(2), finding these Respondents to be in default in this proceeding and ordering that the registration of each class of their securities registered pursuant to Exchange Act Section 12 be revoked.

**Conclusion**

For the reasons set forth above, the Division respectfully requests that the Commission:  
1) grant the Division's Motion; 2) enter an order of default against Knowledgebroker, Millers,  
and Omega; and 3) revoke the registration of each class of their securities registered pursuant to  
Section 12 of the Exchange Act.

Dated: November 5, 2019

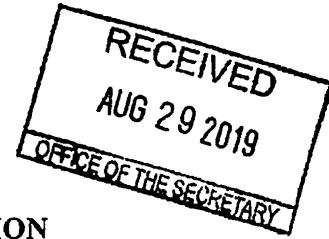
Respectfully submitted,

  
\_\_\_\_\_  
James Carlson (202) 551-3711  
Gina Joyce (202) 551-4850  
Securities and Exchange Commission  
100 F Street, N.E., Room 5120  
Washington, D.C. 20549-5010

COUNSEL FOR  
DIVISION OF ENFORCEMENT

# **EXHIBIT A**

UNITED STATES OF AMERICA  
Before the  
SECURITIES AND EXCHANGE COMMISSION



ADMINISTRATIVE PROCEEDING  
File No. 3-19270

In the Matter of  
  
Knowledgebroker, Inc., *et al.*,  
  
Respondents.

**DECLARATION OF GINA JOYCE  
TO ASSIST SECRETARY WITH RECORD OF SERVICE**

GINA JOYCE, pursuant to 28 U.S.C. § 1746, declares:

1. I am a Senior Counsel with the Division of Enforcement (“Division”) of the Securities and Exchange Commission, and co-counsel for the Division in the captioned administrative proceeding. I am submitting this Declaration to assist the Secretary in maintaining a record of service on the respondents in the captioned proceedings pursuant to Rule 141(a)(3).

2. Among other means, Securities and Exchange Commission (“Commission”) Rule of Practice 141(a)(2)(ii) permits service on a corporation or entity by delivering a copy of an Order Instituting Administrative Proceedings (“OIP”) to an agent authorized by appointment or law to receive such service or, in the case of an issuer with a class of securities registered with the Commission, by sending the OIP via U.S. Postal Service certified, registered, or Express Mail and obtaining a confirmation of attempted delivery on the most recent address shown on the entity’s most recent filing with the Commission.

Further, the OIP in this matter authorizes service of the OIP “by any means permitted by the Commission’s Rules of Practice.” Therefore, the Division asked the Commission’s Secretary to first attempt service on the Respondents via U.S. Priority Mail Express.

3. The Office of the Secretary provided me with the U.S. Priority Mail Express tracking numbers for the copies of the Order Instituting Proceedings (“OIP”)<sup>1</sup> that were mailed by the Secretary to the respondents in these proceedings. I input each of the tracking numbers into the U.S. Postal Service’s (“USPS’s”) package tracking system on its Internet website located at [www.usps.com](http://www.usps.com), and printed out the tracking confirmations in order to obtain confirmation of the delivery or attempted delivery of the OIP on each respondent. A true copy of the tracking confirmations for all of the respondents for whom express mail service was attempted is attached as Exhibit 1, hereto.

4. The Secretary mailed the OIP to respondent Knowledgebroker, Inc., CIK 948280 (“Knowledgebroker”), via Priority Mail Express, Tracking No. EF 200198581 US, to the address shown on its most recent EDGAR filing at 13295 Mira Loma Road, Reno, NV 89511. This address is taken from Knowledgebroker’s last filing with the Commission, which was a Form 8-K filed with the Commission on October 9, 2001. The USPS tracking system confirms that the package was forwarded to another address on August 5, 2019. Delivery was attempted, on August 6, 2019, but the package was marked return to sender . The package was returned to the SEC. *See* Exhibit 1 at pp. 2 - 3.

5. The Secretary mailed the OIP to respondent Millers American Group, Inc. a/k/a Millers Mutual Fire Insurance Co., CIK 1035978 (“Millers Mutual”), via Priority Mail

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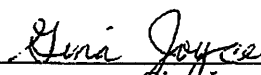
<sup>1</sup>Each service package included the OIP, a letter from the Commission’s Secretary, and a letter from the Division offering discovery pursuant to Rule of Practice 230.

Express, Tracking No. EF 200201192 US, to the address shown on its most recent EDGAR filing at 777 Main Street, Suite 1000, Fort Worth, TX 76102. This address is taken from Millers Mutual's last filing with the Commission, which was a Form 10-12G filed with the Commission on May 31, 2000. The USPS tracking system confirms that delivery was attempted on July 26, 2019. The addressee had moved and left no forwarding address. The package was returned to the SEC. *See Exhibit 1 at p. 7.*

6. The Secretary mailed the OIP to respondent Omega Orthodontics, Inc., CIK 1032628 ("Omega"), via Priority Mail Express, Tracking No. EF 200194240 US, to the address shown on its most recent EDGAR filing at 3621 Silver Spur Lane, Acton, CA 93510. This address is taken from Omega's last filing with the Commission, which was a Form 10-QSB filed with the Commission on May 17, 1999. The USPS tracking system confirms that delivery was attempted, on July 29, 2019, but the package was refused; the addressee was unknown. The package was returned to the SEC. *See Exhibit 1 at p. 10.*

I declare under penalty of perjury that the foregoing is true and correct.

Executed on August 29, 2019.

  
\_\_\_\_\_  
Gina Joyce



Track Another Package +

Tracking Number: EF200198581US

Remove X

Scheduled Delivery by

**MONDAY**

**5** AUGUST 2019 ⓘ by **12:00pm** ⓘ

 **Delivered**

August 8, 2019 at 10:52 am  
Delivered  
WASHINGTON, DC 20549

Get Updates ▾

Feedback

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Text & Email Updates ▾

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Proof of Delivery ▾

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Tracking History ▲

August 8, 2019, 10:52 am  
Delivered  
WASHINGTON, DC 20549

Your item was delivered at 10:52 am on August 8, 2019 in WASHINGTON, DC 20549 to SEC 20549 R26. The item was signed for by C HARRIS.

**August 8, 2019, 10:39 am**  
Out for Delivery  
WASHINGTON, DC 20018

**August 8, 2019, 10:21 am**  
Arrived at Post Office  
WASHINGTON, DC 20018

**August 8, 2019, 7:42 am**  
Arrived at USPS Regional Facility  
WASHINGTON DC V STREET DISTRIBUTION CENTER

**August 7, 2019, 4:40 pm**  
No Such Number  
RENO, NV 89510

**August 7, 2019, 3:22 pm**  
No Such Number  
RENO, NV 89510

**August 7, 2019, 12:54 pm**  
No Such Number  
RENO, NV 89510

**August 6, 2019, 11:05 pm**  
Return to Sender  
RENO, NV 89510

**August 6, 2019, 11:05 pm**  
Return to Sender  
RENO, NV 89510

**August 6, 2019, 10:13 am**  
Return to Sender  
RENO, NV 89511

Feedback

**August 6, 2019, 9:29 am**  
Arrived at Post Office  
RENO, NV 89511

**August 5, 2019, 4:51 pm**  
Forwarded  
RENO, NV

**August 5, 2019, 4:27 pm**  
Departed USPS Regional Facility  
RENO NV DISTRIBUTION CENTER

**August 5, 2019, 10:01 am**  
Forwarded  
RENO, NV

**August 5, 2019, 9:16 am**  
Arrived at Post Office  
RENO, NV 89510

**August 3, 2019, 2:04 pm**  
Arrived at USPS Regional Facility  
RENO NV DISTRIBUTION CENTER

**August 3, 2019, 10:52 am**  
Departed USPS Facility  
RENO, NV 89511

**August 3, 2019, 10:43 am**  
Arrived at USPS Facility  
RENO, NV 89511

**August 2, 2019, 9:38 pm**  
Departed USPS Regional Facility  
RENO NV DISTRIBUTION CENTER

Feedback

**August 2, 2019, 9:35 pm**  
Arrived at USPS Regional Facility  
RENO NV DISTRIBUTION CENTER

**August 2, 2019, 9:35 pm**  
USPS in possession of item  
RENO, NV 89510

**August 2, 2019, 10:28 am**  
Return to Sender  
RENO, NV 89511

**August 2, 2019, 10:14 am**  
Arrived at USPS Facility  
RENO, NV 89511

**August 2, 2019, 9:37 am**  
Arrived at Post Office  
RENO, NV 89511

**August 1, 2019, 9:45 pm**  
Departed USPS Regional Facility  
RENO NV DISTRIBUTION CENTER

**August 1, 2019, 9:12 pm**  
Arrived at USPS Regional Facility  
RENO NV DISTRIBUTION CENTER

**August 1, 2019**  
In Transit to Next Facility

**August 1, 2019, 10:51 am**  
Arrived at USPS Facility  
RENO, NV 89511

Feedback

August 1, 2019, 7:44 am  
Arrived at USPS Regional Facility  
RENO NV DISTRIBUTION CENTER

July 31, 2019, 10:43 pm  
Departed USPS Regional Facility  
LINTHICUM HEIGHTS MD DISTRIBUTION CENTER

July 31, 2019, 8:29 pm  
Arrived at USPS Regional Facility  
LINTHICUM HEIGHTS MD DISTRIBUTION CENTER

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Product Information



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See Less ^

Feedback

## Can't find what you're looking for?

Go to our FAQs section to find answers to your tracking questions.

FAQs (<https://www.usps.com/faqs/uspstracking-faqs.htm>)

**Track Another Package +**

**Tracking Number:** EF200201192US

Remove X

Your item was delivered at 7:44 am on July 29, 2019 in WASHINGTON, DC 20549 to SEC 20549 R26. The item was signed for by M BIGBE.

 **Delivered**

July 29, 2019 at 7:44 am  
Delivered  
WASHINGTON, DC 20549


Feedback

Get Updates 


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Text & Email Updates 

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Proof of Delivery 

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Tracking History 

**July 29, 2019, 7:44 am**

Delivered

WASHINGTON, DC 20549

Your item was delivered at 7:44 am on July 29, 2019 in WASHINGTON, DC 20549 to SEC 20549 R26. The item was signed for by M BIGBE.

July 27, 2019, 11:50 am  
Available for Pickup  
WASHINGTON, DC 20549

July 27, 2019, 11:08 am  
Arrived at Post Office  
WASHINGTON, DC 20018

July 27, 2019, 9:58 am  
Available for Pickup  
WASHINGTON, DC 20549

July 27, 2019, 8:23 am  
Arrived at USPS Regional Facility  
WASHINGTON DC V STREET DISTRIBUTION CENTER

July 26, 2019, 6:58 pm  
Arrived at USPS Regional Facility  
COPPELL TX DISTRIBUTION CENTER

July 26, 2019, 2:52 pm  
Arrived at USPS Facility  
FORT WORTH, TX 76102

July 26, 2019, 2:50 pm  
Moved, Left no Address  
FORT WORTH, TX 76102

July 26, 2019, 12:34 pm  
Insufficient Address  
FORT WORTH, TX 76102

July 26, 2019, 10:55 am  
Rescheduled to Next Delivery Day  
FORT WORTH, TX 76102

Feedback

July 26, 2019, 9:27 am  
Arrived at Post Office  
FORT WORTH, TX 76102

July 26, 2019, 7:10 am  
Arrived at USPS Regional Facility  
COPPELL TX DISTRIBUTION CENTER

July 25, 2019, 7:41 pm  
Departed USPS Regional Facility  
LINTHICUM HEIGHTS MD DISTRIBUTION CENTER

July 25, 2019, 7:32 pm  
Arrived at USPS Regional Facility  
LINTHICUM HEIGHTS MD DISTRIBUTION CENTER

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Product Information



Feedback

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See Less ^

## Can't find what you're looking for?

Go to our FAQs section to find answers to your tracking questions.

FAQs (<https://www.usps.com/faqs/uspstracking-faqs.htm>)



**Track Another Package** +

**Tracking Number:** EF200194240US

Remove X

Your item was delivered at 11:11 am on July 31, 2019 in WASHINGTON, DC 20549 to SEC 20549 R26. The item was signed for by C RIOS.

 **Delivered**

July 31, 2019 at 11:11 am  
Delivered  
WASHINGTON, DC 20549

Get Updates 

Feedback

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Text & Email Updates



---

Proof of Delivery



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Tracking History



July 31, 2019, 11:11 am  
Delivered  
WASHINGTON, DC 20549

Your item was delivered at 11:11 am on July 31, 2019 in WASHINGTON, DC 20549 to SEC 20549 R26. The item was signed for by C RIOS.

**July 31, 2019, 10:40 am**  
Arrived at Post Office  
WASHINGTON, DC 20018

**July 29, 2019, 11:57 am**  
Addressee Unknown  
ACTON, CA 93510

**July 29, 2019, 11:56 am**  
Refused  
ACTON, CA 93510

**July 27, 2019, 9:22 am**  
Arrived at Post Office  
ACTON, CA 93510

**July 27, 2019, 12:06 am**  
Departed USPS Facility  
TEHACHAPI, CA 93561

**July 26, 2019**  
In Transit to Next Facility

**July 26, 2019, 10:20 am**  
Arrived at USPS Facility  
TEHACHAPI, CA 93561

**July 26, 2019, 8:16 am**  
Arrived at USPS Regional Facility  
VAN NUYS CA DISTRIBUTION CENTER

**July 25, 2019, 7:50 pm**  
Departed USPS Regional Facility  
LINTHICUM HEIGHTS MD DISTRIBUTION CENTER

Feedback

July 25, 2019, 7:32 pm  
Arrived at USPS Regional Facility  
LINTHICUM HEIGHTS MD DISTRIBUTION CENTER

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Product Information

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See Less ^

## Can't find what you're looking for?

Go to our FAQs section to find answers to your tracking questions.

FAQs (<https://www.usps.com/faqs/uspstracking-faqs.htm>)

Feedback

**The easiest tracking number is the one you don't have to know.**

With Informed Delivery®, you never have to type in another tracking number. Sign up to:

**CERTIFICATE OF SERVICE**

I hereby certify that true copies of the Division of Enforcement's Motion for Default and Brief in Support were served on the following on this 5 day of November, 2019, in the manner indicated below:

By Hand:

Office of the Secretary  
Securities and Exchange Commission  
100 F Street, N.E.  
Washington, D.C. 20549-2557

By Certified Mail:

Knowledgebroker, Inc.  
13295 Mira Loma Road  
Reno, NV 89511

By Certified Mail:

Millers American Group, Inc. a/k/a Millers Mutual Fire Insurance Co.  
777 Main Street, Suite 1000  
Fort Worth, TX 76102

By Certified Mail:

Omega Orthodontics, Inc.  
3621 Silver Spur Lane  
Acton, CA 93510

  
James Carlson