

FILED

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Chief Hearing Officer
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November 11, 2010

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* see 11/19/10 memo
EMAIL Rcvd 11/12/10

Hearings Unit, DIC
Patricia D. Petersen
Chief Hearing Officer

Subject: Reconsideration Request under RCW 34.05.470
Reference: Docket No. 10-0013

As Licensee, Carlton Mark Williams, I am seeking reconsideration of the Order entered, November 2, 2010 upholding the revocation of my Insurance Producers License. I am also requesting an extension of time to surrender my Insurance Producers License from November 17, 2010 until the reconsideration request is considered and ruled upon.

I am seeking a lesser penalty such as a suspension of my license with conditions of compliance versus an outright revocation of my license.

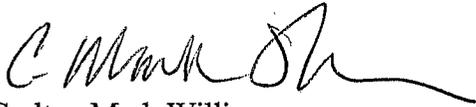
The motion for reconsideration is based upon the following factors:

- 1) Upon my felony conviction, I immediately notified my employer as well as the Office of the Insurance Commissioner.
- 2) I have complied with every court-ordered condition of my conviction
 - A) Completed 20 hours of Electronic Home-Detention
 - B) Completed State Certified Gambling Treatment
 - C) Continue to participate in Gambling Anonymous Meetings/Activities
 - D) Completed 240 hours of Community Service
 - E) Paid Full Restitution prior to being charged
 - F) Total compliance with Dept. of Correction
- 3) Additionally, I realize that the references to Title 48 RCW 48.17.530 (1)(h) stated in the "Conclusions of Law" statements listed in the Order allows for the most severe sanction. However, it was determined by the Prosecuting Attorney, and accepted by the Sentencing Judge that my actions that resulted in my being charged and convicted of a felony were the result of a gambling addiction for which I paid full restitution and sought treatment prior to ever being charged. Although the order continually refers to using fraudulent, coercive or dishonest practices implies that no underlying circumstances were contributing to my behavior. Obviously that was not the case. Also the reference to my "early point of recovery" suggests that there is a question as to the effectiveness of my treatment and my resolve not to re-offend. Completing my treatment and continuing to participate in Gamblers Anonymous has demonstrated to me that a person can fall, but recover to an improved quality of life after succumbing to the illness of gambling.

- 4) During my entire career as a Licensed Insurance Agent or now as an Insurance Producer, have I received any complaints while performing my duties. I have never misused my license and never posed a threat to public policy.
- 5) My employer continues to support me and values me as an asset to their business. Internal processing and financial controls provide constant visibility and failsafe against any fiduciary misconduct.

It is for the previously stated reasons that I request that I be allowed to retain my license with any appropriate conditions that I have to follow for a time certain.

Respectfully submitted,



Carlton Mark Williams
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