

HAMJE

JUN 04 2010

CONSUMER PROTECTION

May 20, 2010

John Hamje
Deputy Insurance Commissioner
Office of the Insurance Commissioner
P.O. Box 40257
Olympia, WA 98504-0257

Re: No. 10-0053

Mr. Hamje,

The intent of this communication is to request a hearing to contest the above referenced order. The reasons for my request are that:

(1) although it is within the authority of the Office of the Insurance Commissioner to revoke my license on the grounds that I have committed a felony, the felony had nothing whatsoever to do with my conduct relative to my being an insurance agent in the state of Washington, nor did it have anything to do with my conduct relating to my clients or any action concerning them, individually or collectively. As such, it is also within the Office's authority to choose to not revoke my license.

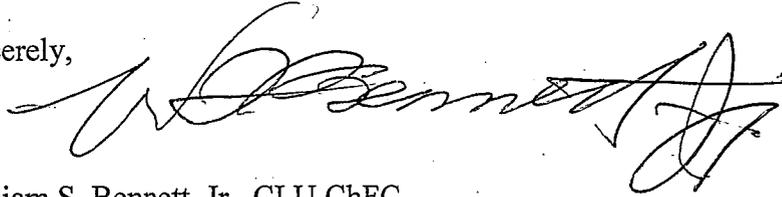
(2) My failing to notify the Office of the Insurance Commissioner of my change of office address was not intentional, but rather, heretofore, all actions pertaining to any licensing, etc. in this state or any other were previously taken care of by New York Life Insurance Company, with whom I was a career agent for over twenty years. During my twenty plus years with New York Life, my office address changed four times, but I was not aware that I needed to make the change personally with the Office of the Insurance Commissioner. I was automatically renewed every two years without any input on my part with regard to my life and health licenses in my state of domicile (Washington). Due to the fact that I was a registered representative for NYLIFE Securities, all documentation was handled for me by the compliance channels, with the exception of my U-4, which most recently showed my office address as: 914 140th Ave. N.E. Suite #202, Bellevue, WA 98005.

(3) The incident cited in the letter of revocation was not entirely accurate. Although, in error, I did initially indicate that there was no surrender charge on the replacement of the New York Life policy, after further review of the policy replacement, I discovered that I had not been accurate and informed the policy owner of the correct surrender charge before the delivery of the policy. Attached, is a letter from that client, Sam Baxter, with regard to that transaction.

Additionally, although submitted previous to the revocation order, I am again including letters from some of my most esteemed clients and peers regarding my personal integrity and character. Yes, I did make a mistake and committed a felony in the process. I have made full restitution of the money converted and am serving probation for three years and

providing 120 hours of community service for my crime. I have been terminated by New York Life as an agent with that company after over twenty years of unblemished service. My past and present record within the scope of the practice of insurance and securities and taking good care of my clients is without stain. It is for all of the reasons above that I request a hearing in the interest of regaining my ability to continue to take care of my clients. I have not requested a hearing with the Department of Securities because I no longer wish to work in that arena. However, I very much desire to resume my career in the insurance business.

Sincerely,

A handwritten signature in cursive script, appearing to read "W. S. Bennett, Jr.", written in dark ink.

William S. Bennett, Jr. CLU ChFC

May 20, 2010

John F. Hamje
Deputy Insurance Commissioner
Office of the Insurance Commissioner
P.O. Box 40257
Olympia, Washington 98504-0257

SUBJECT: No. 10-0053 (William S. Bennett, Jr.)

Dear Mr. Hamje,

I am writing this letter in the interest of clarifying a point of misunderstanding with regard to the replacement of New York Life policy # 62 738 333 with John Hancock policy # 94 754 702 for the same face amount of \$600,000.

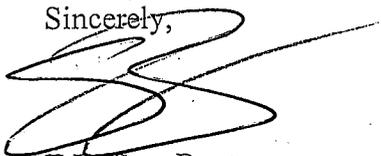
When the policy application was written, I was informed there would be no surrender charge associated with the replacement policy. After further review of the former policy and before delivering the new policy to me, William S. Bennett, Jr. (Bill Bennett) informed me he had failed to disclose there would be a \$3,000 surrender charge but assured me the \$3,000 surrender charge would more than be made up in future premium savings.

Bill emphasized the new policy was guaranteed to persist to age 100 at the proposed premium. The former policy would not have persisted at the current premium due to interest rate reductions over the years and was not guaranteed to persist to age 100 even at the new policy's premium.

It is important that you know Bill Bennett has been my friend for over thirty years and my insurance advisor for over twenty years. He has been forthcoming about his situation with your department and I trust him now as much as I did when I first took a policy with him over twenty years ago. There were no omissions that were not later corrected and he has put my family in a better position for having replaced the previous policy with a more current and appropriate policy.

Thank you for your attention in considering the above facts. If you have questions or desire further information, please feel free to contact me at (425) 688-5156 (work).

Sincerely,



T.D. Sam Baxter



Ash Brokerage Corporation
720 Olive Way, Suite 1050
Seattle, WA 98101

The Practice Enhancement Company™

Barry McCracken, CLU, ChFC, CFP
Managing Director

February 12, 2010

To Whom It May Concern :

I have worked closely with Bill Bennett for the past three years. During this time I have gotten to know him both as an insurance professional as well as a person.

On the professional side, I have found Bill to be extremely knowledgeable as well as very thorough. I have also noted that in every instance, he places the interest of his client first.

As a person, Bill is honest and ethical. He can be blunt at times, but I, for one, truly appreciate his candor. I would not hesitate to recommend Bill to a friend or family member, as I value his expertise as well as his integrity.

I would be happy to speak with anyone regarding Bill if I can be of assistance.

Sincerely,

Barry McCracken, CLU, ChFC, CFP

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March 1, 2010

Re: William S. Bennett, Jr.
Character Reference

To Whom It May Concern.

It has been my pleasure to know Bill Bennett for nearly twenty years in a rather wide variety of circumstances. For the last ten years or so, he has been my closest, personal friend. Aside from his wife, Janet I think I have gotten to know Bill better than almost anyone who may know him.

Perhaps it would be helpful to understand how our friendship grew over many years in one key aspect of our close relationship. I served for over six years as a bishop of our church congregation of more than 400 members. This was a very demanding 'lay' calling in our church. I worked with the members of my congregation with many moral, mental, marital, and even abuse issues. For all practical purposes, I was the pastor for our congregation. So I think I developed a pretty good perspective in determining people with great character, talent, abilities, as well as weaknesses.

Such is the case with Bill Bennett. Having known him for some time, I chose him to be one of my 'counselors' or assistants, where he faithfully served for about two years. This was a very demanding 'lay' calling for him as well. Only after many months did Bill confide in me that both of his kidneys were failing. Over time, I watched his health fail and he became more and more ill. Yet, through all of this, not once did he ever fail in his responsibilities. Not once did I ever observe him to be anything but a man of great integrity and honor, and he gave his whole heart in the service to other people. He also regularly gave me wise and valuable counsel and support in his role in his calling. He was a tremendous asset and confidant to me.

On an even more personal level, Bill and I have shared the most personal details of our lives with regards to our hopes, dreams, struggles and ambitions. I would say that he is the only person outside of my wife with whom I've had this type of personal relationship.

Nearly a couple of months ago, Bill requested that I meet with him as he had something to discuss with me. Through tremendous embarrassment and shame on his part, he disclosed the issue of how he had mishandled the funds of his mother's estate. He didn't hold anything back. This was particularly difficult for him, as I was his previous church leader, and close personal friend.

Now, by nature of my previous church calling, I've been through a multitude of so-called confessions. I know when one is thorough and a person is contrite. In this case, Bill wanted to be sure that I was fully aware of all the details. For him, it was all about his character. He was so concerned about my reaction to the news and how I'd view him and his character. I don't think there's anything more important to a man than his good name and standing.

Bill also disclosed all that he has done to make full restitution. He has not attempted to hide in any manner from his mistakes, nor seek the easy way out. Quite the contrary! He's accepted full responsibilities for his mistakes and has done everything he could do to put things in order. Based upon my many years in working with people through personal faults, Bill's actions are the epitome of a person who is pained by their mistakes and is striving in every way possible to right a wrong. Through his actions and efforts in handling this matter, he has reinforced to me his high integrity and maintains his good name.

Given the condition of Bill's failing health and how this affected his income, Bill fell victim to a way to temporarily bridge some income shortfall, and then repay those funds. He admits that this was way out of character for him and he calls it a 'stupid mistake.' Most mistakes are just that, stupid.

In spite of all of this, I know Bill to be a man of good character. He has handled sizeable financial investment transactions for me in the past. I have no reservations now, or in the future with Bill continuing to do so.

I am confident that I know Bill's heart regarding this matter. It's in the right place. He admits his wrong, has done everything possible to correct it. If only more people would step forward and handle such matters in this way! This does speak volumes about his character. I for one am more than willing to extend my hand to him and give him a second chance. I hope you would do the same. He's deserving of it.

Sincerely,



Clair L. Jenkins
6106 204th Dr. NE
Redmond, WA 98053
425-868-8296 (hm)
425-785-4687 (cell)

March 2, 2010

To Whom It May Concern:

I write this letter on behalf of William S. Bennett, Jr.

Bill Bennett has been my friend for thirty years and life insurance agent for over twenty years. In the years I have known Bill, he has been honest and of the highest character in all of our dealings, both personal and professional.

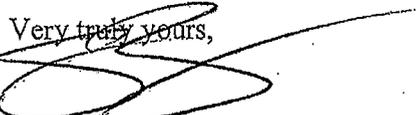
As my life insurance agent, Bill has acted in the most professional way. He provides me expert information and educational material about life insurance and related financial matters. He encourages me to explore and consider various insurance options, discuss them with my wife and other professionals, and make decisions based on what is in my best interests without any undue influence on his part. When I have sought services beyond his expertise or outside the scope of his licensure or qualifications, he has promptly disclosed such and encouraged me to seek appropriate professional consultation.

I believe one of the greatest demonstrations of Bill's character is that he informed me of his current circumstances with full disclosure, accepting responsibility for his actions, apologizing for any embarrassment he may have caused me (of which there is none) and informing me of the potential consequences. I admire Bill's honesty and desire to be responsible and accountable for his actions.

I trust Bill and hope he is allowed to continue providing the same high quality, professional life insurance services he has provided over the past many years.

Please feel free to contact me at any time to discuss the content of this letter or my personal or professional dealings with Bill Bennett.

Very truly yours,



T. D. Sam Baxter
14623 128th Avenue NE
Woodinville, Washington 98072
(425) 488-1835 (home)
(425) 688-5156 (work)

March 6, 2010
21420 NE 133rd Street
Woodinville, WA 98077
(425)260-3657

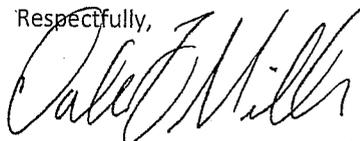
To whom it may concern;

I am writing a letter of reference on behalf of William Bennett of Redmond, Washington. I have known Bill for seven years, and have found him to be honest and always willing to serve others with his time and talents. Bill is also willing to admit mistakes and take whatever action necessary to correct them, a rare trait in general and rarer still in the financial world. I believe that he retains the trust of his clients in the financial services industry after a period of unprecedented volatility and uncertainty.

Bill has faced personal challenges in the past decade that would literally cripple most people, including life threatening illness that led to a kidney transplant, caring for an invalid parent for many years, and working with his children through some remarkably difficult conditions that they were diagnosed with. Through this time he has remained a positive influence in many people's lives throughout the community, and maintained a pleasant and positive demeanor. I consider him a personal example in overcoming and growing from personal challenges.

Please feel free to contact me if you would like to discuss Mr. Bennett's qualifications or character further. It would be my pleasure to do so.

Respectfully,



Dale T. Miller
Senior Vice President
Morgan Stanley Smith Barney LLC
Managing Partner, Pacific Wealth Management Group