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BEFORE THE OFFICE OF THE INSURANCE COMMISSIONER

2012.07.06 -b A 11:20

In the Matter of

WALLS INSURANCE AND SECURITIES SCHOOL,

Insurance Education Provider

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Order No. 12-0035

Heidi S. ...  
Palmer D. ...  
Chief Hearing Officer

OIC HEARING MEMORANDUM

FACTS

M. Scott Reilly is the owner of an approved continuing insurance education provider, Walls Insurance and Securities School #24961 ("Walls") in Bellevue. Mr. Reilly is also a licensed producer.

Education providers are required to maintain a course roster, consisting of sign-in and sign-out registers, for lecture (classroom) courses, and a purchase-and-complete roster for self-study courses. The education provider is required to electronically submit the roster for the course to the OIC within 10 days after completion of the course. Failure to do so violates WAC 284-17-272(1)(h).

Several insurance education providers have been identified by the Licensing and Education office of the OIC as habitually violating the regulation requiring on-line rosters within 10 days. Walls is not only one of those providers, but was the worst late roster submitters in the state of Washington in 2011 (Exhibit 1). The investigation for the period between January 2011 to October 2011 is complete and past violations are not part of this enforcement action. By way of background, it should be noted that as early as 2008, Walls was informed of problems with their online submissions (Exhibit 2). The OIC's insurance education provider procedures have been posted on our web site for many years (Exhibit 3).

The OIC's Joe Mendoza conducted CE Surveys in 2009 and 2010 and several letters and e-mails were sent to Walls requesting course information and reminding Mr. Reilly about late rosters (Exhibit 4). On July 25, 2011, Joe sent out a e-mail to all insurance education providers titled, "New Provider Web Pages for PLE & CE"(Exhibit 5). This provided notification that procedures were posted on our web site. Although Walls complained that the OIC's online submission system was defective, Mr. Mendoza determined that it was Walls' system that was causing some of the problems (Exhibit 6).

Despite these notices and warnings of potential enforcement action, Walls submitted 113 tardy rosters during the period of the 2011 investigation (Exhibit 7). Mr. Mendoza will further explain the list of late rosters at hearing.

On February 8, 2012, Walls was offered a Consent Order Levying a Fine of \$8,475, with \$6,475

suspended for two years pending no further violations, to settle the matter (Exhibit 8). On February 9, 2012, Mr. Reilly sent a harshly worded complaint to the OIC's "Ask Mike" website (Exhibit 9). Rather than take responsibility for being by far the worst offender in the state for late rosters, he lashed out at the OIOC, calling it "increasingly hostile, arbitrary, and petty." He went on to say that his insurance continuing education students "are all going to hear about this."

The total fine was calculated at \$75 per violation, but most of the fine was suspended. Had Walls agreed to the Consent Order, however, a payment of \$2,000 only would have been due within thirty days of the entry of the Order, not \$8,400, as Mr. Reilly suggests. It may well be that Mr. Reilly knows that his ability to keep Walls in compliance with regulations is so doubtful that it is only a matter of time until Walls again violates WAC 284-17-272 and causes the entire fine to become due and payable.

Despite all of the follow up and notices from Mr. Mendoza, Walls claimed to have been compliant with all requirements and complains that he was blindsided by the Consent Order (Exhibit 10). Mr. Mendoza refuted Mr. Reilly's contentions, again referencing past communications between himself and Walls concerning late rosters (Exhibit 11). Walls declined to enter into the Consent Order and requested a hearing on March 7, 2012 (Exhibit 10).

## **ARGUMENT AND AUTHORITY**

### **I. Grounds for A Fine**

WAC 284-17-272(1)(h) requires that an approved continuing insurance education provider must file course student rosters electronically within ten days after completion of the course.

WAC 284-17-302 states that a fine may be imposed for failing to comply with any rule pertaining to continuing insurance education providers.

RCW 48.17.560 permits the Commissioner to fine an insurance education provider up to \$1,000 per violation of the insurance code, in addition to or in lieu of revocation of its approval.

### **II. Argument**

It is ludicrous for Walls to contend that it was compliant and there was never notice that its continued violations could result in enforcement action. No notice is required, of course, but Mr. Mendoza repeatedly warned Walls of the consequences of failure to comply. The figures speak for themselves in Exhibit 1—Walls is far and above the most egregious violator in the State.

Walls and Mr. Reilly have abdicated their responsibility to comply with the requirements that other education providers have been able to complete regularly and compliantly. Mr. Mendoza was more than patient with Walls, but every time something went wrong, it was always Mr. Mendoza, the OIC's website, or "clerical errors and teething problems associated with a new program" he blames for the extent and duration of Walls' roster problems.

The fine actually imposed, barring future violations, is \$2,000. Each of the 113 violations has a

maximum fine available to the OIC of \$1,000 per violation, for a total of \$113,000. \$2,000 is only 0.17% of the maximum fine possible. Given the lack of cooperation and responsibility demonstrated by Walls and Mr. Reilly, the fine should be much higher. When the undersigned returned a call from Mr. Reilly, even Mrs. Reilly was hostile and aggressive, again blaming Mr. Mendoza for their problems. Their attitude is seen throughout this case and should be considered when a fine is determined.

### III. Exhibits to be Presented

- Exhibit 1 OIC Graph Showing Late Roster Filings 1-1-11 to 10-30-11. (1 pg.)
- Exhibit 2 OIC Letters dated June 26, 2008 and October 8, 2008 to Walls. (5 pgs.)
- Exhibit 3 OIC Instructions for CE Providers from [www.insurance.wa.gov](http://www.insurance.wa.gov). (4 pgs.)
- Exhibit 4 OIC Email to Walls dated December 16, 2009, OIC Email to Walls dated January 28, 2010, OIC Letter to Walls dated August 16, 2010, OIC Email to Walls dated August 25, 2010, OIC Email to Walls dated April 25, 2011, OIC Email to Walls dated May 18, 2011, and OIC Email to Walls dated November 16, 2011. (17 pgs.)
- Exhibit 5 Email of OIC Introduction to OIC Web-based Assistance to CE Providers dated July 25, 2011. (3 pgs.)
- Exhibit 6 Declaration of Joe Mendoza with attachments. (48 pgs.)
- Exhibit 7 List of Walls Late Roster Submissions with explanatory email dated March 6, 2012. (13 pgs.)
- Exhibit 8 Proposed Consent Order Sent to Walls on February 8, 2012. (3 pgs.)
- Exhibit 9 Complaint from Walls to the "Ask Mike" website dated February 9, 2012. (2 pgs.)
- Exhibit 10 Emails from Walls dated March 7, 2012 requesting a hearing. (1pg.)

Respectfully Submitted this 5<sup>th</sup> day of April 2012.



Marcia G. Stickler

Legal Affairs Division

Office of the Insurance Commissioner

(360) 725-7048 or [MarciaS@oic.wa.gov](mailto:MarciaS@oic.wa.gov)

**Verified Late Rosters**

January 1, 2011 to October 30, 2011

	Walls	Pro Training Ctr	Intellipass	All Others
125				
	113			
100				
		84		
75				
			56	
50				
				19
25				
0				

June 26, 2008

WALLS INSURANCE AND SECURITIES SCHOOL  
M SCOTT REILLY  
555 116<sup>TH</sup> AVE NE STE 125  
BELLEVUE WA 98004

RE: Non-Compliance, On-line Roster Requirement

Dear Mr. Reilly,

OIC has become aware that you have not registered to submit continuing education (CE) course rosters on our web site. Furthermore, several CE courses reported by attendees are not verified by your organization as required under WAC 284-17-212 (8) and WAC 284-17-298.

Several weeks ago when we spoke of this matter you indicated you had thrown away the on-line registration letter because you did not believe the requirement applied to self study courses. I informed you that it applies to all CE courses offered by Walls Insurance School. I sent you a new registration letter on May 28, 2008, yet our records indicate you still have not registered and submitted CE course rosters.

Failure to comply with these requirements can result in a fine pursuant to WAC 284-17-302 (5). Also, provider approval can be suspended or revoked pursuant to WAC 284-17-304.

We have received notice from 21 attendees of CE courses completed with Walls Insurance School since April 30, 2008. You are requested to enter all CE course rosters for courses completed since April 30, 2008. Please complete the roster submissions by July 11, 2008. Please contact us to verify you have complied with this request.

If you need assistance with the on-line registration process please contact me.

Sincerely,

Joe Mendoza  
Insurance Analyst - Education  
Office of Insurance Commissioner  
(360) 725-7146  
fax (360) 586-2019

EXHIBIT 2 PAGE 1

STATE OF WASHINGTON



OFFICE OF  
INSURANCE COMMISSIONER

October 9, 2008

RE: Continuing Education Provider: Walls Insurance School #24961  
CE course reported by agent but not verified by the CE provider

Dear CE Provider:

The attached report indicates CE courses reported by agents but have not been verified by your organization through the on-line roster submission process. As you are aware, rosters must be submitted on-line within 10 days of course completion.  
WAC 284-17-272 and WAC 284-17-298.

The report includes the WAOIC number of the agent and the course number and completion date reported by the agent. Please review the course number and completion date for each course to verify the information is correct.

If correct, write the same completion date in the last column on the form (Actual completion date) and submit the roster on-line immediately. Initial the "verified by" column once the roster is submitted.

If the completion date is incorrect, please write-in the correct completion date in the last column and initial the "verified by" column.

If your record does not confirm the agent completed the course indicate "no record" in the last column and initial.

**All persons that initial the report must sign their name at the end of the report.**

Once you complete the report return it to Insurance Analyst Joe Mendoza, no later than **October 20, 2008.**

Sincerely,

JOE MENDOZA  
Insurance Analyst  
Licensing and Education  
P.O. Box 40257  
Olympia WA 98504-0257  
(360)725-7146

EXHIBIT 2 PAGE 2

WALLS

Home repairs

Provider

NAOC #	Course #	Provider #	Completion Date	Submission Date	Provider Name	Verified by	Actual Completion date
167733	172701	24961	05/03/2008	05/07/2008	Walls		
266917	172701	24961	05/07/2008	05/07/2008			
167733	169664	24961	05/02/2008	05/07/2008			
167733	177430	24961	05/05/2008	05/07/2008			
228210	177430	24961	05/08/2008	05/09/2008			
228210	169664	24961	05/07/2008	05/09/2008			
228210	298188	24961	05/09/2008	05/09/2008			
228210	171171	24961	05/09/2008	05/09/2008			
197922	171182	24961	05/11/2008	05/14/2008			
236319	298188	24961	05/08/2008	05/19/2008			
236319	255189	24961	05/11/2008	05/19/2008			
236319	172701	24961	05/19/2008	05/19/2008			
236319	171193	24961	05/12/2008	05/19/2008			
168197	171182	24961	05/06/2008	05/20/2008			
234591	171182	24961	05/19/2008	05/27/2008			
230570	171182	24961	05/22/2008	05/27/2008			
234591	172738	24961	05/19/2008	05/27/2008			
230570	172756	24961	05/24/2008	05/27/2008			
234591	255189	24961	05/15/2008	05/27/2008			
197645	172729	24961	05/12/2008	05/27/2008			
234591	172729	24961	05/20/2008	05/27/2008			
230570	169664	24961	05/23/2008	05/27/2008			
240234	177430	24961	05/26/2008	05/27/2008			
240234	172701	24961	05/22/2008	05/27/2008			
240234	169664	24961	05/23/2008	05/27/2008			
234591	169664	24961	05/14/2008	05/27/2008			
258940	177430	24961	05/21/2008	05/28/2008			
258940	171193	24961	05/22/2008	05/28/2008			
258940	172729	24961	05/27/2008	05/28/2008			
258940	171182	24961	05/27/2008	05/28/2008			
268926	177430	24961	05/20/2008	05/29/2008			
268926	169664	24961	05/21/2008	05/29/2008			
268926	172701	24961	05/23/2008	05/29/2008			
149265	177430	24961	06/11/2008	06/12/2008			
149265	172701	24961	06/05/2008	06/12/2008			
149265	169664	24961	06/07/2008	06/12/2008			
706150	169664	24961	06/10/2008	06/13/2008			
706150	172701	24961	06/08/2008	06/13/2008			
706150	177430	24961	06/12/2008	06/13/2008			
143759	172729	24961	06/16/2008	06/17/2008			
240572	169664	24961	06/14/2008	06/18/2008			
240572	177430	24961	06/18/2008	06/18/2008			
240572	172701	24961	06/15/2008	06/18/2008			

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Received back incomplete  
10-2008  
SM

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98235	255189	24961	05/30/2008	06/20/2008		
198035	172701	24961	06/04/2008	06/20/2008		
198035	169664	24961	06/08/2008	06/20/2008		
198035	177430	24961	06/06/2008	06/20/2008		
98235	171193	24961	06/06/2008	06/20/2008		
706292	172710	24961	06/12/2008	06/30/2008		
178994	177430	24961	05/27/2008	06/30/2008		
238338	177430	24961	07/02/2008	07/03/2008		
238338	172701	24961	07/03/2008	07/03/2008		
238338	169664	24961	06/30/2008	07/03/2008		
103198	255189	24961	07/04/2008	07/14/2008		
103198	172738	24961	07/02/2008	07/14/2008		
103198	171171	24961	07/07/2008	07/14/2008		
103198	172747	24961	07/05/2008	07/14/2008		
200450	169664	24961	07/07/2008	07/14/2008		
200450	172701	24961	07/08/2008	07/14/2008		
200450	177430	24961	07/10/2008	07/14/2008		
103198	171193	24961	07/01/2008	07/14/2008		
702899	172701	24961	07/14/2008	07/17/2008		
702899	169664	24961	07/16/2008	07/17/2008		
702899	169675	24961	07/15/2008	07/17/2008		
125207	169664	24961	07/11/2008	07/25/2008		
125207	171171	24961	07/13/2008	07/25/2008		
125207	255189	24961	07/15/2008	07/25/2008		
125207	298188	24961	07/10/2008	07/25/2008		
125207	171182	24961	07/13/2008	07/25/2008		
241951	171171	24961	07/17/2008	07/28/2008		
241951	171182	24961	07/24/2008	07/28/2008		
241951	172756	24961	07/17/2008	07/28/2008		
241951	255189	24961	06/30/2008	07/28/2008		
241951	298188	24961	07/22/2008	07/28/2008		
241951	171193	24961	07/25/2008	07/28/2008		
129808	177430	24961	06/02/2008	07/30/2008		
241598	298188	24961	08/04/2008	08/07/2008		
241598	172729	24961	08/04/2008	08/07/2008		
241598	171193	24961	08/06/2008	08/07/2008		
241598	177430	24961	08/05/2008	08/07/2008		
153899	171193	24961	05/22/2008	08/12/2008		
263986	172710	24961	08/12/2008	08/15/2008		
706497	169675	24961	08/14/2008	08/15/2008		
238503	172701	24961	06/25/2008	08/22/2008		
238503	169664	24961	06/24/2008	08/22/2008		
265091	171182	24961	08/29/2008	09/03/2008		
268783	169675	24961	09/09/2008	09/17/2008		
705710	172701	24961	08/21/2008	09/19/2008		
705710	177430	24961	08/26/2008	09/19/2008		

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705710	169664	24961	09/02/2008	09/19/2008			
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Complete and  
return by  
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# Instructions

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## CE Provider Quick Tips

### How to access the insurance commissioner's new online licensing service

#### CE Provider registration/login instructions

##### CE Provider registration

To register go to [www.insurance.wa.gov](http://www.insurance.wa.gov)

1. Click on the Agent/Broker tab at the top of the page, select *Online Services* and select the "Continuing Education Providers" link. This takes you to the *Online Licensing Services* registration/login page.
2. Go to the "New User?" **Register** hyperlink. This takes you to the *User Registration* page.
3. Type your User ID and temporary password as printed in your registration letter. All passwords are case sensitive. From the Business Type drop-down list, select "Provider."
4. Click on the "Next" button at the bottom of the page. This takes you to the "Update Provider Contact Information" page.
5. Complete the licensing profile information. **Make sure that e-mail address is correct.** We will use this address information for all future licensing communication including your appointment renewal notification.
6. Click on the "Register" button at the bottom of the page. This will take you to the *Registration Confirmation* page. **You will receive a confirmation e-mail at the e-mail address you entered.**
7. You have now completed the registration process
8. Click on the "Home" button to go to the *Online Licensing Services* home page.

##### CE Provider Login (after initial registration)

To login go to [www.insurance.wa.gov](http://www.insurance.wa.gov)

1. Click on the Agent/Broker tab at the top of the page
2. Select *Online Services* and select "Continuing Education Provider" link. This takes you to the *Online Licensing Services* registration/login page.
3. The User Login section is located in the upper left corner of the page.
4. Enter your User ID and password and select the "Go" button. This takes you to the *Online Licensing Services* home page
5. If you forget your password, click on Forgot Password? Link. This takes you to the *Forgot Password* page.

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6. Enter your insurer's WAOIC number, your e-mail address and select if you are an Administrator or Secondary user. You will receive an e-mail with your new login credentials.

### **CE Provider Online Licensing Home Page Services Change Password**

1. Choose the "Change Password" button located on the left side of the page.
2. Type your current password
3. Type your new password. You must use between 8 -16 characters and it must contain at least two numbers and one letter.
4. Confirm your password by typing it again.
5. Click on the "Submit" button, which takes you to the 'Change Password Confirmation' page.
6. You have now completed changing your password.
7. Click on the "Home" button to return to the Online Licensing home page.

### **Create a Secondary User (an additional person who is allowed to act on behalf of the insurer)**

1. Choose the "Create Secondary User" button located on the left side of the home page.
2. As the administrator, you type the secondary user's e-mail address for the Login Name in the User ID box.
3. Module Code is "Licensing." Status should appear as "Active."
4. Type the secondary user's name
5. Determine what functionality to give to the secondary user
  - a. Select "CE course roster" if you want the secondary user to submit course rosters.
  - b. Select "Change Secondary User Password" if you want to give the secondary user permission to change their password.
  - c. Selecting the box in the blue banner will select all functions.
6. Click on the "Save" button. This takes you to Confirmation page. The secondary user will receive an e-mail about their login credentials.
7. You have now completed creating a secondary user.
8. Click on "Home" button to return to the Online Licensing Services home page.

### **Modify a Secondary User**

1. Choose the "Modify Secondary User" button located on the left side of the home page.
2. As the administrator, you enter the secondary user's e-mail address for the login name in the User ID box.
3. The current secondary user information will display. Only the administrator can change or correct any information or change the status to active or inactive.
4. The administrator can reset the functionality of the secondary user by clicking on a blank box to add functionality or clicking on the checked box to remove functionality.

5. Click on the "Save" button at the bottom of the page. This takes you to Confirmation page for successful modifications of a secondary user. If you modify the login name, the secondary user will receive an e-mail about their new login credentials.
6. You have now completed modifying a secondary user.
7. Click on "Home" button to return to the Online Licensing Services home page

### **Submit a CE course roster**

1. Choose the "CE Course Roster" button located on the left side of the home page.
2. Your provider number and name will automatically display.
3. Enter the course number and click out of the text box. The course name, credit hours, and ethics hours will automatically display. If any of this information is incorrect, verify you have entered the correct course number. For incorrect information, please contact Joe Mendoza at 360-725-7146, or email [joem@oic.wa.gov](mailto:joem@oic.wa.gov).
4. Select the instruction method for which the course was approved. A course may be lecture, self-study, or both. However, you can only have one instruction method per roster.
5. Enter the course completion date. This date cannot have occurred prior to the approval date of the course nor can it be a future date.
6. You should complete the course location for all lecture courses.
7. For lecture courses, you must add the instructor(s) by completing the Instructor Information.
  - a. If the instructor is a licensee, enter the instructor's WAOIC number. The name will automatically display. The "Licensee Lookup" feature is available to search for the number if you do not know it or it is incorrect. This link is located in the first block under "Attendees."
  - b. If the instructor is not a licensee, enter the instructor's name.
  - c. If there is more than one instructor, click on the "Add" function at the left side of the bar labeled "Instructor Information." This adds another row to enter the second instructor's information.
  - d. You may also delete an entered instructor prior to submitting the roster. Click on the check box to the right of the instructor's name, and then click on the "Delete" function at the left side of the bar labeled "Instructor Information."
8. For Self-Study courses, the Instructor section will not display.
9. Complete the Attendee section for both lecture and self-study courses.
  - a. Click on the "Add" function at the left side of the bar labeled 'Attendee.'

- b. Enter the licensee's WAOIC number in the row created. The licensee's name will display. Please verify the name is correct. The "Licensee Lookup" feature is available to search for the number if you do not know it or it is incorrect. This link is located in the first block under "Attendees."
  - c. Click on the 'Add' function again to add additional rows to enter WAOIC numbers for more attendees.
  - d. You may also delete an entered attendee prior to submitting the roster. Click on the check box to the right of the attendee's name, then click on the "Delete" function at the left side of the bar labeled "Attendees."
  - e. If a course is repeated within a three-year period, the system will not accept the licensee as an attendee.
  - f. The attendee must have a current license or previous license record. If not, the Online Services will not accept the course attendance information.
  - g. After you enter all the attendees, click on the "Submit" button at the bottom of the page. This takes you to the Confirmation page.
10. You have now completed submitting a course roster. You have the option to print a copy of the submitted roster
  11. If at a later date, you need to add an attendee to a course roster, log on to the Online Services and select the "CE Course Roster" button. Enter the same course name, completion date, and instruction method as previously submitted. The current course roster information will appear. You will have the ability to add additional attendees and submit the appended roster. You may also print the corrected roster when finished.

For questions about this new service, please call 360-725-9633 and select the "Licensing" option or send an e-mail to [onlinelicense@oic.wa.gov](mailto:onlinelicense@oic.wa.gov)



**Mendoza, Joe (OIC)**

**Subject:** FW: Provider 24961 Course Verification October & November

**Importance:** High

2009 Survey

**From:** Mendoza, Joe  
**Sent:** Wednesday, December 16, 2009 11:37 AM  
**To:** 'mulsgroup@aol.com'  
**Cc:** Baughman, Jeff (OIC)  
**Subject:** Provider 24961 Course Verification October & November  
**Importance:** High

**Subject:** Provider 24961

RETURN WITHIN 15 Days of the date of this e-mail.

Please verify the completion dates for these courses reported by producers.

If the completion date is correct, please submit the roster immediately. It is late.

If the completion date is incorrect, please write down the actual completion date.

If you cannot verify the course, write "Not verified"

WAOIC #	Course #	Provider #	Reported Completion Date	Actual Completion Date
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October

724775	604237	24961	10/05/2009	
724775	603552	24961	10/06/2009	
229117	603548	24961	10/07/2009	
229117	604786	24961	10/05/2009	
716005	169675	24961	10/11/2009	
716005	604237	24961	10/11/2009	
725319	603551	24961	10/13/2009	
725319	169675	24961	10/13/2009	
725319	169664	24961	10/13/2009	
725319	604237	24961	10/10/2009	
725319	604592	24961	10/10/2009	
251350	298188	24961	10/01/2009	
260471	171193	24961	10/28/2009	
260471	604592	24961	10/25/2009	
241020	171193	24961	10/28/2009	
217146	604237	24961	10/30/2009	

217146	169664	961	10/31/2009	
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November

258693	604237	24961	11/07/2009	
260471	604237	24961	11/01/2009	
260471	169664	24961	11/08/2009	
720969	171193	24961	11/09/2009	
720969	604237	24961	11/07/2009	
720969	169675	24961	11/07/2009	
720969	169664	24961	11/03/2009	
720969	603549	24961	11/11/2009	
229116	604237	24961	11/12/2009	
229116	169675	24961	11/12/2009	
229116	171193	24961	11/12/2009	
732519	603552	24961	11/13/2009	
732519	604786	24961	11/12/2009	
732519	603550	24961	11/13/2009	
244360	171193	24961	11/16/2009	
244360	604237	24961	11/16/2009	
244360	604592	24961	11/15/2009	
244360	169664	24961	11/13/2009	
717402	604301	24961	11/19/2009	
717402	171171	24961	11/18/2009	
717402	171193	24961	11/17/2009	
717402	169675	24961	11/16/2009	
717402	604237	24961	11/15/2009	
724061	603549	24961	11/20/2009	
724061	171193	24961	11/20/2009	
724061	604592	24961	11/20/2009	
724061	169675	24961	11/20/2009	
724061	604237	24961	11/20/2009	
5187	169675	24961	11/20/2009	
5187	604237	24961	11/20/2009	
217146	604592	24961	11/02/2009	
217146	171193	24961	11/13/2009	
263587	169675	24961	11/22/2009	
9602	171193	24961	11/21/2009	
9602	171182	24961	11/23/2009	
9602	604237	24961	11/24/2009	
9602	169675	24961	11/26/2009	
9602	171171	24961	11/28/2009	

9602	603552	24961	11/29/2009	
266243	171182	24961	11/20/2009	
266243	604592	24961	11/24/2009	
266243	603549	24961	11/26/2009	
266243	603548	24961	11/26/2009	
266243	603552	24961	11/28/2009	
731632	603551	24961	11/30/2009	
731632	171193	24961	11/25/2009	
249872	171171	24961	11/16/2009	
249872	171193	24961	11/16/2009	
249872	604237	24961	11/16/2009	
249872	171182	24961	11/16/2009	
104966	169675	24961	11/30/2009	
104966	604237	24961	11/30/2009	
104966	171193	24961	11/30/2009	

Signature of person that verified the information \_\_\_\_\_ date \_\_\_\_\_

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2010

**Mendoza, Joe (OIC)**

**Subject:** FW: CE Courses Not Verified by Provider - 2009 Provider 24961

**From:** Mendoza, Joe  
**Sent:** Thursday, January 28, 2010 3:47 PM  
**To:** 'mulsgroup@aol.com'  
**Subject:** FW: CE Courses Not Verified by Provider - 2009 Provider 24961

**RE: Overdue Rosters**  
WALLS INSURANCE AND SECURITIES SCHOOL 24961

Attached is the list of courses that were reported by licensees for CE credit in 2009. However, we did not receive a roster from the provider.

As you are aware, providers have 10 days to submit the on-line roster and issue a certificate of completion to the licensee.

Please review the list and be sure to submit an on-line roster if the course information entered by the licensee matches your record.

Note: If the completion date does not match your record, you will get a yellow banner stating "the course is already used for renewal/reinstate during last 3 years. The same course cannot be repeated within 3 years."

We will run the report again in 30 days to verify the rosters were submitted. Therefore, it is not necessary to reply.

Course #	Provider #	Completion Date Reported By Licensee	Licensee WAOC #
172701	24961	01/06/2009	717407
255189	24961	01/10/2009	215490
171171	24961	01/21/2009	51863
171171	24961	01/22/2009	238753
171171	24961	01/26/2009	272071
171171	24961	01/24/2009	706233
171171	24961	01/25/2009	715471
169675	24961	01/20/2009	177561
171193	24961	01/25/2009	250868
298188	24961	01/26/2009	250868
172729	24961	01/24/2009	250868
172701	24961	01/09/2009	712162
169664	24961	01/09/2009	712162
177430	24961	01/09/2009	712162
603548	24961	02/06/2009	249573
603549	24961	02/19/2009	247139
603329	24961	02/13/2009	209912
169664	24961	02/20/2009	209912
177430	24961	02/19/2009	209912
255189	24961	02/27/2009	709499

171171	24961	3/10/2009	249332
169675	24961	03/08/2009	249332
603552	24961	03/08/2009	249332
169664	24961	03/09/2009	249332
603550	24961	03/10/2009	249332
172701	24961	01/14/2009	714068
169664	24961	01/30/2009	714068
177430	24961	01/22/2009	714068
171182	24961	03/24/2009	719843
171193	24961	03/23/2009	719843
255189	24961	03/20/2009	719843
255189	24961	03/25/2009	126498
169675	24961	03/25/2009	126498
603549	24961	03/25/2009	126498
171182	24961	03/25/2009	126498
171193	24961	03/25/2009	126498
172738	24961	01/15/2009	208083
171171	24961	04/02/2009	707864
177430	24961	04/03/2009	707864
255189	24961	03/24/2009	707864
603552	24961	03/31/2009	707864
171182	24961	04/02/2009	707864
169664	24961	04/15/2009	155035
603550	24961	04/09/2009	155035
255189	24961	04/08/2009	155035
171193	24961	04/09/2009	155035
171171	24961	04/16/2009	155035
603549	24961	02/10/2009	715764
255189	24961	03/30/2009	235817
177430	24961	03/30/2009	235817
603552	24961	03/09/2009	708987
603552	24961	05/03/2009	714195
603550	24961	05/03/2009	714195
255189	24961	05/13/2009	714195
298188	24961	05/14/2009	714195
169664	24961	05/15/2009	714195
169675	24961	05/14/2009	714195
255189	24961	04/24/2009	714747
169664	24961	05/26/2009	715329
603549	24961	06/02/2009	155593
169664	24961	06/10/2009	711742
169664	24961	05/15/2009	247446
177430	24961	06/11/2009	218242
169664	24961	06/15/2009	721402
177430	24961	06/24/2009	236295
171171	24961	06/23/2009	236295
171182	24961	06/23/2009	236295
171193	24961	06/25/2009	236295

603329	24961	3/27/2009	79363
604237	24961	07/06/2009	710361
177430	24961	05/25/2009	251644
604237	24961	07/24/2009	183654
169664	24961	07/22/2009	183654
171193	24961	07/28/2009	183654
603553	24961	07/20/2009	183654
171193	24961	08/07/2009	252458
203995	24961	02/14/2009	197495
603551	24961	10/13/2009	725319
169675	24961	10/13/2009	725319
169664	24961	10/13/2009	725319
604237	24961	10/10/2009	725319
604592	24961	10/10/2009	725319
255189	24961	06/07/2009	191481
603552	24961	06/06/2009	191481
171193	24961	06/23/2009	191481
95095	24961	04/14/2009	191481
169675	24961	11/22/2009	263587
171193	24961	12/15/2009	138127
604237	24961	12/21/2009	109706
604592	24961	12/30/2009	704619
169664	24961	12/30/2009	704619
604237	24961	12/29/2009	704619
169675	24961	12/29/2009	704619
256410	24961	09/23/2009	732908
171193	24961	12/08/2009	255061

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August 16, 2010

WALLS INSURANCE AND SECURITIES SCHOOL  
M SCOTT REILLY  
555 116TH AVE NE STE 125  
BELLEVUE WA 98004

RE: WALLS CONTINUING EDUCATION AUDIT RESULTS 7-29-10

Scott, we completed our review of your continuing education records and this letter will provide you with our findings, comments and recommendations. We looked at 23 student files to review enrollment forms, certificates and exam scores. We also reviewed course files.

CE Course Records:

The file we reviewed only has course renewal notice letters dating back to March 2009. Not all course applications for current and recently cancelled courses are in the file. Except for one LTC course presentation, sign-in sheets are only kept for the Series 6 and 63 classes. Also, there is no record of the 10 day notice of presentation for lecture courses submitted to the OIC. Course certificates are kept in the individual student files.

*All CE course records must be kept for three years.*

Certificates:

The business practice is to present both Series 6 (20 hour course) and Series 63 (4 hour course) but only issues certificates for the Series 6 course.

*Certificates must be issued for the Series 63 course. This is a code requirement.*

Also, the WA LTC Initial 8 Hour Course is approved as a lecture course. In the two student records we reviewed, the certificate issued to the student indicates self study.

*The proper certificate must be issued for each course.*

Lecture Course Sign-in Sheets:

Walls School offers three lecture courses for continuing education. WA LTC Initial 8 Hour Course, Series 6 and Series 63. The business practice is to have students sign-in for the Series 6 and Series 63 classes but not the WA LTC Initial 8 Hour Course. Students initial their enrollment form to verify attendance for the LTC class.

We reviewed two student records with enrollment forms for the LTC class. One had initialed the enrollment form and the other had not.

We reviewed several sign-in sheets for the Series 6 and Series 63 courses. The top of the form has the class date and the class time. The students initialed and dated the sign-in and sign-out but did not indicate the time they arrived and left. There is no way to determine if a student arrived late or left early.

*All lecture courses require a sign-in register. The register must indicate the date and time the student signed-in and signed -out.*

10 Days to issue the Certificate:

We reviewed CE course records for on-line courses and for correspondence courses. On-line courses are often sold as a package with several courses included. The on-line self study computer program automatically scores the exams. The business practice is to ask students to submit all course exams together once completed. Therefore, a student might complete courses several weeks apart but submit all exams at once.

Each correspondence course exam is included in the textbook and the score sheet is mailed or faxed to Walls School and manually scored.

In a student record we reviewed, the courses were completed on May 26, May 27, May 28 and June 26, 2010. The course exam results were submitted to Walls School on June 26, 2010. Walls School then issued the certificates on June 28, 2010. Certificates were issued two days after receiving the exam results submitted by the student. However, the 10 day limitation to issue a certificate begins when the course is completed. For self study, this is when the provider grades the exam and confirms the passing score.

The certificates are not issued within 10 days of passing the exam but rather, they are issued within 10 days of the date the student submits the exam to Walls School. This can be several weeks after the student passed the exam.

***We considered this business practice and determined it is not compliant with WAC 284-17-272 . Certificates must be issued within 10 days of course completion. The completion date is the date the exam is scored to verify the passing score. Since this is done by computer, the certificate should be issued within 10 days of the date the exam is scored by the computer. Students should be asked to immediately submit the exam result for each course rather than wait until all courses are completed.***

10 Day Notice of Lecture Course Presentation:

Copies of the 10 day notice of presentation were not found in the records. The business practice is to offer lecture courses as the need arises and usually on short notice.

We reviewed the OIC's Late Roster Report and found several class dates indicated for the WA LTC Initial 8 Hour Course. The OIC was not notified of these presentations at least 10 days prior. Also, we are not receiving a 10 day notice for the Series 6 and 63 courses.

***The provider must give the OIC a 10 day notice of a presentation of an approved lecture course.***

10 Day Roster submission:

The OIC Education Aging Report indicates several courses reported by producers but not verified by Walls School with the on-line roster program. Course rosters must be submitted within 10 days of course completion. Walls School is notified every two months of the courses that were not verified by a roster.

The OIC Late Roster Report shows a significant number of late rosters listed for Walls Insurance School. This means the course rosters were submitted after 10 days from the completion date indicated. The on-line roster program is the only accepted method of submitting rosters and all providers are expected to have access to the internet to use the on-line roster program.

***Rosters must be submitted electronically within 10 days of course completion. Walls School will be sent a copy of the OIC Late Roster Report so the staff can monitor their progress in reducing the number of rosters reported after 10 days.***

Web Site:

Using the link to Walls Insurance School from our OIC web page, we found several courses advertised on the Walls School web page that expired. One course expired in 2000 and several expired over the past seven years.

We were informed that Walls School no longer uses the web address ([www.wallsinsuranceschool.com](http://www.wallsinsuranceschool.com)) for their CE courses. The current CE web site is [WallsCE.com](http://WallsCE.com). We suggest adding a link to the Walls CE web page from the Walls School PLE web page. We checked [WallsCE.com](http://WallsCE.com) and found several expired courses listed.

*Walls School agreed to remove the outdated CE course information from the [Wallsinsuranceschool.com](http://Wallsinsuranceschool.com) site and the [WallsCE.com](http://WallsCE.com) web site. If the information on the Walls School web page cannot be updated soon, we will temporarily disable the link (to the Walls web page) from the OIC PLE provider web page.*

Summary:

*Two previously discussed issues remain: submitting on-line rosters within 10 days of course completion and updating information on the Walls School web page.*

*Course applications, course approval letters, course renewal letters must be kept for three years from the date the course is no longer active. Course sign-in sheets must be kept for three years from the date of the course.*

*Sign-in Sheets are required for all lecture courses. The sign-in sheet must indicate the time the student arrived and the time the student left.*

*Certificates for self study courses must be issued within 10 days of course completion.*

*The 10 day notice of presentation for lecture courses must be sent to the OIC.*

*Certificates must be issued for the Series 63 course.*

If you have any questions about this report, please contact me.

Sincerely,

JOE MENDOZA  
Program Analyst -Education  
Office of Insurance Commissioner  
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[joem@oic.wa.gov](mailto:joem@oic.wa.gov)

**Mendoza, Joe (OIC)**

2010

**Subject:** FW: LATE ROSTER REPORT

**From:** Mendoza, Joe  
**Sent:** Wednesday, August 25, 2010 3:34 PM  
**To:** 'muisgroup@aol.com'  
**Subject:** LATE ROSTER REPORT

NO ACTION NEEDED. INFORMATION ONLY

This is the new Late Roster Report. This report will identify late rosters submitted by CE providers. Once we remove the ability for producers to enter CE courses as they renew their license on-line, we will begin to enforce the 10 day limit for submitting course rosters. Each violation of the code is subject to a fine of not more than \$1000 per occurrence.

This report shows your current roster activity for August 25, 2008 to August 25, 2010. If you have several courses listed, then you will need to review your roster submission procedures to be sure you are in compliance. We expect the changes to go into effect in 2011 so now is the time to review your office procedures.

## CE Course Rosters Entered Over 10 Days

Provider Name	Provider Number	Course Number	Course Title	Course Completion Date	Roster Creation Date
WALLS INSURANCE AND SECURITIES SCHOOL	24961	353632	LTC SPECIAL EDUCATION	12/12/2008	04/30/200
WALLS INSURANCE AND SECURITIES SCHOOL	24961	353632	LTC SPECIAL EDUCATION	06/06/2008	10/06/200
WALLS INSURANCE AND SECURITIES SCHOOL	24961	353632	LTC SPECIAL EDUCATION	08/14/2008	10/19/200
WALLS INSURANCE AND SECURITIES SCHOOL	24961	353632	LTC SPECIAL EDUCATION	10/10/2008	10/22/200
WALLS INSURANCE AND SECURITIES SCHOOL	24961	353632	LTC SPECIAL EDUCATION	09/09/2008	09/21/200
WALLS INSURANCE AND SECURITIES SCHOOL	24961	353632	LTC SPECIAL EDUCATION	07/02/2008	09/12/200
WALLS INSURANCE AND SECURITIES SCHOOL	24961	353632	LTC SPECIAL EDUCATION	08/28/2008	09/11/200
WALLS INSURANCE AND SECURITIES SCHOOL	24961	353632	LTC SPECIAL EDUCATION	11/17/2008	12/01/200
WALLS INSURANCE AND SECURITIES SCHOOL	24961	353632	LTC SPECIAL EDUCATION	11/06/2008	11/20/200
WALLS INSURANCE AND SECURITIES SCHOOL	24961	353632	LTC SPECIAL EDUCATION	11/21/2008	12/09/200
WALLS INSURANCE AND SECURITIES SCHOOL	24961	353632	LTC SPECIAL EDUCATION	11/07/2008	01/05/200
WALLS INSURANCE AND SECURITIES SCHOOL	24961	353641	LTC SPECIAL REFRESHER EDUCATION	01/16/2008	09/21/200

WALLS INSURANCE AND SECURITIES SCHOOL	24961	605410	ETHICS	07/22/2010	08/12/2010
WALLS INSURANCE AND SECURITIES SCHOOL	24961	605410	ETHICS	04/19/2010	05/04/2010
WALLS INSURANCE AND SECURITIES SCHOOL	24961	605410	ETHICS	04/24/2010	05/07/2010
WALLS INSURANCE AND SECURITIES SCHOOL	24961	605410	ETHICS	04/01/2010	05/26/2010
WALLS INSURANCE AND SECURITIES SCHOOL	24961	605410	ETHICS	05/06/2010	05/18/2010

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2011

**Mendoza, Joe (OIC)**

**Subject:** FW: LATE ROSTERS and LATE CERTIFICATES  
**Attachments:** 20110425\_085647.pdf  
**Importance:** High

**From:** Mendoza, Joe (OIC)  
**Sent:** Monday, April 25, 2011 9:54 AM  
**To:** 'mulsigroup@aol.com'  
**Cc:** Baughman, Jeff (OIC)  
**Subject:** LATE ROSTERS and LATE CERTIFICATES  
**Importance:** High

WALLS INSURANCE AND SECURITIES SCHOOL 24961  
M SCOTT REILLY

RE: LATE ROSTERS and LATE CERTIFICATES

Scott,

We are conducting a survey of continuing education courses. We have requested certificates from producers to verify courses they reported.

The attached certificates indicate four courses were completed on February 21, 2011 but the certificates were certified by Megan Reilly on March 21, 2011. This indicates that the certificates were issued a month after the courses were completed. Also, we do not have rosters for these courses.

These are both violations of the Washington Administrative Code. Rosters must be submitted and certificates issued within 10 days of course completion.

The Office of Insurance Commissioner has notified you and your staff of these requirements on several occasions in the past. Yet we continue to see late rosters and late certificates issued to producers. As a continuing education provider, you must adhere to the provider requirements indicated in the Washington Administrative Code.

Producers rely on you to promptly submit their course roster and issue their certificate so they can renew their license without paying a late fee. When you do not submit their roster, they are further inconvenienced because they have to send us their course certificate.

**Please review your procedures for reporting rosters and issuing certificates and send us a written confirmation regarding the changes that will be implemented by your office to adhere to these code requirements. Send us the letter within 15 days.**

Sincerely,

JOE MENDOZA  
Program Analyst  
Licensing and Education  
Office of Insurance Commissioner  
(360) 725-7146  
Fax: (360) 586-2019  
[joem@oic.wa.gov](mailto:joem@oic.wa.gov)

3011

**Mendoza, Joe (OIC)**

**Subject:** FW: Late Roster

**Importance:** High

**From:** Mendoza, Joe (OIC)  
**Sent:** Wednesday, May 18, 2011 9:10 AM  
**To:** 'mulsgroup@aol.com'  
**Cc:** Baughman, Jeff (OIC)  
**Subject:** RE: Late Roster  
**Importance:** High

WALLS INSURANCE AND SECURITIES SCHOOL 24961

Pam and Scott,

In reply to Pam's request that we notify you every month about your missing rosters, I am providing some information about our survey process.

SURVEY PROCESS

We do a quarterly survey to identify missing course rosters for producers that completed courses and received certificates. These producers enter the course information when they renew their license and we receive a report when a matching roster is not found in our record. We send a request for certificates to several producers for our survey. When the producers provide us with their certificates, then we contact the providers to verify the certificates. This process takes several weeks.

COMPLIANCE ISSUE

As you are aware, a provider has 10 days to submit a roster for a course completion. The OIC is not required to send reminders to providers about late rosters but has elected to do so, rather than issue a fine for each violation. However, repeated violations can result in an enforcement action. Each late roster is a violation of the WAC and subject to a fine of up to \$1000.

MISSING ROSTERS

The certificates I received from Danielle Lee and Thuy Nguyen indicate they completed self study courses but they were not added to the rosters. Our survey confirms that WALLS is not submitting rosters for all producers that completed courses. This appears to be an issue with your records and procedures.

If you had added Danielle and Thuy to the rosters, they would appear on the rosters. It is not possible to add producers to a roster and submit it and then not see their names appear on the roster. If a producer is added on the roster and the WAOIC number is incorrect, the system would display a error message and that producer would have to be deleted before the roster can be submitted. Furthermore, our roster program does not randomly delete producers.

You have had over three years, since April 2008, to improve your procedures and systems to comply with our on-line roster requirements, yet we continue to see many missing rosters and late rosters. Continued violations will eventually result in an enforcement action.

We will continue our quarterly surveys and you will be notified about missing rosters as we complete the surveys.

JOE MENDOZA  
Program Analyst  
Licensing and Education

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**From:** [mulsgroup@aol.com](mailto:mulsgroup@aol.com) [<mailto:mulsgroup@aol.com>]  
**Sent:** Tuesday, May 17, 2011 9:44 PM  
**To:** Mendoza, Joe (OIC)  
**Subject:** Re: Late Roster

Joe,  
As far as I knew, this was entered in February. Why was I not notified until May? I entered them again as soon as I got the email. You used to run a report every month and I could very easily rectify these simple clerical errors. Please send the reports promptly.  
Pam

-----Original Message-----  
From: Mendoza, Joe (OIC) <[JoeM@OIC.WA.GOV](mailto:JoeM@OIC.WA.GOV)>  
To: [mulsgroup@aol.com](mailto:mulsgroup@aol.com)  
Cc: Baughman, Jeff (OIC) <[JeffB@OIC.WA.GOV](mailto:JeffB@OIC.WA.GOV)>  
Sent: Tue, May 17, 2011 9:50 am  
Subject: Late Roster

WALLS

RE: Danielle Lee  
WAOIC# 258627

Scott,

The attached certificates indicate this producer completed several courses but was not added to the course rosters. Please add Danielle Lee to the rosters if your records confirm she completed these courses.

Please send me a confirmation when the rosters are submitted. These are overdue so please respond by Monday, May 23, 2011.

JOE MENDOZA  
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From: Mendoza, Joe (OIC) (OIC) < M@OIC.WA.GOV >  
 To: mulsgroup <mulsgroup@aol.com>  
 Subject: January 2010 to October 2011 CE Survey  
 Date: Wed, Nov 16, 2011 4:05 pm

2011  
 Recent  
 Survey

WALLS INSURANCE AND SECURITIES SCHOOL 24961  
 M SCOTT REILLY

This is a list of courses submitted by producers for which we never received rosters. We need to have on-line rosters submitted if these completion records are valid.

WAOIC #	Course #	Provider #	Completion Date	Submission Date
173408	169664	24961	03/01/2010	03/02/2010
741893	169664	24961	04/24/2010	04/29/2010
255235	169675	24961	03/23/2010	03/30/2010
271453	169675	24961	03/31/2010	04/07/2010
272071	169675	24961	03/26/2010	04/09/2010
11/17 265787	169675	24961	01/01/2010 5/6/11	04/30/2010
11/17 255235	171171	24961	03/24/2010	03/30/2010
11/17 197645	171193	24961	04/21/2010	05/10/2010
11/17 732406	171193	24961	06/29/2010	06/29/2010
11/17 163293	256410	24961	01/25/2011	02/04/2011
11/17 747541	603548	24961	10/15/2010	10/15/2010
11/30 744610	603549	24961	01/31/2011	02/07/2011
11/30 222480	603549	24961	02/13/2011	03/13/2011
11/30 717401	603549	24961	09/09/2011	09/09/2011
11/30 759922	603549	24961	10/01/2011	10/07/2011
11/16 710606	603549	24961	10/24/2011	11/14/2011
11/30 759922	603550	24961	10/02/2011	10/07/2011
11/16 742774	603551	24961	01/03/2011	01/05/2011
11/16 710606	603551	24961	10/28/2011	11/14/2011
11/16 255235	603552	24961	03/24/2010	03/30/2010
12/1 701839	603552	24961	04/22/2010	08/03/2010
11/16 759922	603552	24961	10/01/2011	10/07/2011
11/16 741697	603553	24961	08/14/2010	08/26/2010
11/16 737746	604237	24961	02/28/2010	03/02/2010
11/16 255235	604237	24961	03/22/2010	03/30/2010
11/16 265787	604237	24961	01/01/2010	04/30/2010
11/17 197645	604237	24961	04/13/2010	05/10/2010
11/17 744338	604237	24961	01/20/2010	01/20/2011
12/1 253681	604237	24961	01/30/2011	05/06/2011
11/17 717401	604237	24961	09/09/2011	09/09/2011
11/16 759922	604237	24961	10/01/2011	10/07/2011
11/16 710606	604237	24961	10/31/2011	11/14/2011
11/17 197645	604301	24961	04/13/2010	05/10/2010
11/16 754216	604301	24961	01/23/2010	11/03/2010
11/16 268159	604592	24961	07/04/2010	07/22/2010
11/30 717401	604592	24961	09/09/2011	09/09/2011

Mark Panelli 11/18  
 David C. Owen 11/18  
 Norman Harshaw 11/18  
 Ruben Ramirez 11/18  
 Olivia Majorani  
 Thomas Zebrowski  
 Norman Harshaw 11/18  
 Julie Chen  
 Irina Bagdasarov - incorr  
 Suwardi Tea  
 Ross Adam Ross  
 Kenneth Friday  
 Elaine Stefferud  
 Rod McInnis  
 Jiali, Lu  
 Thomas David Lutz 11/16/11  
 Jiali, Lu  
 Jennifer Wald  
 Thomas David Lutz 11/16/2011  
 Norman Harshaw 11/18  
 Ken Schaitel  
 Jiali, Lu  
 Michael Bohan  
 Nicholas Busch  
 Norman Harshaw 11/18  
 Thomas Zebrowski  
 Julie Chen  
 Annette Barling Howze  
 Curtis Gray  
 Rod McInnis  
 Jiali, Lu  
 Tom Lutz 11/16/2011  
 Julie Chen  
 Brent Andrew Leacy  
 Leonard Garfan  
 Rod McInnis

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4

11/17	255235	604786	2496	03/23/2010	03/30/2011
11/17	197645	605410	2496	04/05/2010	05/10/2011
12/1	742774	605410	24961	01/03/2011	01/05/2011
12/1	764672	606269	24961	05/24/2011	06/09/2011
11/30	717401	606269	24961	09/09/2011	09/09/2011
11/18	759922	606269	24961	10/01/2011	10/07/2011
11/28	710606	606269	24961	10/26/2011	11/14/2011
11/18	759922	606355	24961	10/02/2011	10/07/2011
11/28	759922	606356	24961	10/02/2011	10/07/2011
12/1	712126	606357	24961	12/15/2010	01/06/2011
11/17	717401	606357	24961	09/09/2011	09/09/2011
11/28	759922	606357	24961	10/03/2011	10/07/2011
12/1	192453	607001	24961	09/28/2011	09/28/2011
12/1	765068	607001	24961	10/07/2011	10/17/2011

Norm Warshaw 11/18  
Julie Chen  
Jennifer Wolf  
Danielle Brown  
Rod McInnis  
Jodi Lu  
Tom Lutz 11/14/2011  
Jodi Lu  
Wan Anderson  
Rod McInnis  
Jodi Lu  
192453 West Pass  
Peter McInnis

JOE MENDOZA  
Program Analyst  
Licensing and Education  
Office of Insurance Commissioner  
(360) 725-7146  
Fax: (360) 586-2019  
joem@oic.wa.gov  
www.insurance.wa.gov

EXHIBIT 4 PAGE 17

Mendoza, Joe (OIC)

2011

**From:** Mendoza, Joe (OIC)  
**Sent:** Monday, July 25, 2011 3:56 PM  
**Cc:** Baughman, Jeff (OIC); Mendoza, Joe (OIC)  
**Subject:** New Provider Web Pages for PLE & CE

Pre-License Education & Continuing Education Providers ,

Washington now has a web page for PLE providers and a web page for CE providers to get answers to common questions about insurance education courses. The **provider web pages are now available.**

Here is the list of topics answered on the pages:

### For Pre-license education (PLE) providers

A **PLE provider** offers insurance education for potential insurance licensees. A **PLE provider** must be approved by the OIC before offering pre-license insurance education. **PLE providers** can request approval to offer: Life, Disability, Property, Casualty or Personal Lines courses.

View a current list of [existing PLE providers](#).

#### On this page:

- [Where to send application or renewal packets](#)
- [Become a PLE provider](#)
- [PLE provider renewal](#)
- [Add additional instructors](#)
- [Fees](#)
- [Exam Pass/Fail ratio report](#)
- [Rosters](#)

### For continuing education (CE) providers

**CE providers** offer insurance education to help producers meet their license renewal requirements.

- A producer must complete 24 hours of approved CE, including three hours of ethics, each license term.

**CE providers** and courses must be approved by the insurance commissioner before advertising or offering CE courses.

#### On this page:

- [Online services login page](#) - to submit rosters
- [Where to send application or renewal packets](#)

3846

1

EXHIBIT

5

PAGE

1

- Become a CE provider
- CE course approval
- Lecture course
- Webinars
- Self study course
- Insurance designation courses
- CE instructor
- Changing provider contact information
- Fees
- CE provider renewal
- CE course renewal
- 10 day notice of subsequent presentation
- Advertising a CE course
- Rosters
- Sign-in sheets
- CE course records

To get to these pages and save them in your "Favorites", go to the **Agent/Brokers** tab and scroll down to:

**For providers & insurers**

For pre-license education providers

For continuing education providers

Insurers

Here is the link to the Agent/Brokers page:

[http://www.insurance.wa.gov/agents\\_brokers/index.shtml](http://www.insurance.wa.gov/agents_brokers/index.shtml)

JOE MENDOZA  
 Program Analyst  
 Licensing and Education  
 Office of Insurance Commissioner  
 (360) 725-7146  
 Fax: (360) 586-2019

**Rosters**

The online roster program began in April 2008 and requires providers to report CE credits for licensees within 10 days of course completion. Our online roster program will accept a late roster but repeated violations of the 10-day roster rule can result in an enforcement action.

To utilize the online roster submission program, you'll need to create an account on our web site by registering. If you have not registered yet, contact our Licensing & Education department and registration information can be e-mailed to you.

If you have registered but forgot your password, use the "Forgot Password?" link in the User Login box to reset your account and have a new password e-mailed to your registered e-mail address.

■ Your User ID is your provider number with the letters L-I-C in front of your provider number:

◦ Example: LIC111111

Login to submit your rosters 

- One roster, per course, per day. If there was a morning presentation of the course (1 to 4 hour course) and an afternoon presentation of the same course, you can only submit one roster for the day.
- Also, if the same course is presented in two locations on the same day, there can only be one roster. Combine the attendees into one roster.

EXHIBIT 5 PAGE 3

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**BEFORE THE WASHINGTON STATE  
OFFICE OF THE INSURANCE COMMISSIONER**

**In the Matter of**

**WALLS INSURANCE AND SECURITIES  
SCHOOL,**

**Insurance Education Provider**

**Docket No. 12-0035**

**DECLARATION OF  
JOE MENDOZA**

16 I, Joe Mendoza, do hereby declare that the following facts are personally known to me, and, if  
17 called upon to do so, I could and would testify to them.  
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1. I am over the age of 18 years and am competent to testify in this matter. I have been an employee of the Washington Office of the Insurance Commissioner ("OIC") since 2007.
  2. I am currently Functional Program Analyst 3 in the Licensing and Education Department of the Office of the Insurance Commissioner, and have held this position since 2007. One of my duties is to assist continuing insurance education providers with compliance with OIC regulatory and statutory requirements, including electronic submission of course rosters after completion of the courses by producer students.
  3. Mr. Scott Reilly is the owner of Walls Insurance and Securities School (Walls School). Pam Reilly is his wife and works for Walls School. The following is a chronological description of communications between myself and the Reillys from July 2010 through October 2011. There is also a brief reference to a letter sent to Walls School on June 26, 2008, to show they were given notice about the regulations pertinent to submitting rosters and the penalty for not doing so. The emails or other documents referred to herein are attached in the order described.

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June 26, 2008. A letter was sent to Mr. Reilly explaining the requirement to submit on-line rosters. The letter identified the regulation about submitting rosters and the regulations about the penalties for failure to comply.

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July 22-23, 2010. Pam Reilly reported some issues with submitting a roster on-line. I sent her an e-mail with instructions for using the on-line roster program and how to correct the issues she described.

49  
50

August 16, 2010. I sent an e-mail to Walls School with my report for the audit of their education records conducted on July 29, 2010. In the audit report, I included a section titled,

**EXHIBIT 6 PAGE 1**

1 "10 Day Roster Submission". Walls School was notified to comply with the 10 day roster  
2 submission requirement. It was indicated that the OIC would send a list of late rosters to  
3 Walls School so they could monitor their progress in reducing the number of late rosters.  
4

5  
6 March 22-23, 2011. I received an e-mail from Pam Reilly and she reported a problem with  
7 submitting on-line rosters. On March 23, 2011, I sent Walls School a reply by e-mail  
8 addressed to Scott and Pam Reilly. I provided information to help them use the on-line roster  
9 program. Item 6 on the e-mail specifies that our on-line roster program requires Internet  
10 Explorer or Firefox.  
11

12  
13  
14 April 25, 2011. We continued to identify late rosters and I sent an e-mail to Walls School  
15 informing them to review their procedures for reporting rosters and send us a written  
16 confirmation for changes they will implement to adhere to the code requirement. There was  
17 no reply so a second e-mail was sent on May 11, 2011.  
18

19  
20 May 13, 2011. I received a reply from Pam Reilly to my e-mails dated April 25 and May 11,  
21 2011. I responded to Walls School by e-mail. Again, the 10-day roster submission  
22 requirement was mentioned.  
23

24  
25 May 25-26, 2011. I received an e-mail from Pam Reilly in response to my e-mail asking  
26 why rosters had not been submitted for five courses completed by a particular student. Pam  
27 indicated she was having computer issues. I wrote back and suggested she use a different  
28 computer to submit the rosters.  
29

30  
31 June 2, 2011. I sent an e-mail to Walls School with a list of late rosters. I did not receive a  
32 reply, so I sent a reminder by e-mail on June 16, 2012.  
33

34  
35 June 17, 2011. I received an e-mail from Pam Reilly. She indicated their printer was not  
36 working. She said she would fax the corrections as soon as she got to the office. The same  
37 day, I received a fax from Walls School in response to the late roster list I had sent them.  
38 There was no mention by Walls School of any computer issues submitting the late rosters on-  
39 line.  
40

41  
42 July 22, 2011. I sent an e-mail to Walls School with a list of late rosters. I received a fax  
43 from Pam Reilly. No mention of any computer issues when submitting the rosters.  
44

45  
46 August 18, 2011. Pam Reilly submitted a Site Feedback form to the OIC. It was routed to  
47 Licensing Manager Jeff Baughman. Jeff sent the form to our Information Technicians. The  
48 issue was assigned to IT Specialist Lisa Whiton. She sent me an e-mail indicating she was  
49  
50

EXHIBIT 6 PAGE 2

1 not able to recreate the issue reported by Pam. She sent me an e-mail and asked for the  
2 course information.  
3

4  
5 I was on vacation from August 18 to 24, 2011.  
6

7 August 29, 2011. I sent an e-mail to Pam Reilly requesting the course information.  
8

9  
10 September 6, 2011. I received an e-mail from Pam Reilly with the course information. She  
11 further described the issue.  
12

13  
14 September 14, 2011. Lisa had a few more questions. The first question was what browser  
15 Pam was using. I sent an e-mail to Pam with a copy of Lisa's questions. I received a reply by  
16 e-mail from Pam. She said she was using the browser Google Chrome.  
17

18  
19 September 19, 2011. Lisa sent an e-mail to Pam explaining our roster program does not  
20 support Google Chrome. Pam was reminded again (see March 23, 2011) to use Internet  
21 Explorer or Firefox.  
22

23  
24 November, 2011. A survey was done for late rosters for the months of September and  
25 October, 2011. Because late rosters continued to be substantial and there was no indication  
26 that Walls School was making a significant effort to improve despite many requests, I  
27 proceeded to submit a referral to legal to pursue an enforcement action.  
28

29 4. Walls School is the only provider that has reported more than one episode where they  
30 were unable to submit rosters due to computer issues. During my visit to Walls School for  
31 the audit, Scott Reilly told me he does not have internet at his school. They take records  
32 home to use their home computer to submit rosters.  
33

34 I certify under penalty of perjury under the laws of the State of Washington, that the foregoing is  
35 true and correct.  
36

37  
38 4-5-2012 OIC office  
39 Date and Place Tammerton  
40 WA.  
41

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44  
45  
46  
47  
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49  
50  
Signature Jose Mendez

MIKE KREIDLER  
STATE INSURANCE COMMISSIONER

STATE OF WASHINGTON

Phone (360) 725-7000  
www.insurance.wa.gov



OFFICE OF  
INSURANCE COMMISSIONER

June 26, 2008

WALLS INSURANCE AND SECURITIES SCHOOL  
M SCOTT REILLY  
555 116<sup>TH</sup> AVE NE STE 125  
BELLEVUE WA 98004

RE: Non-Compliance, On-line Roster Requirement

Dear Mr. Reilly,

OIC has become aware that you have not registered to submit continuing education (CE) course rosters on our web site. Furthermore, several CE courses reported by attendees are not verified by your organization as required under WAC 284-17-212 (8) and WAC 284-17-298.

Several weeks ago when we spoke of this matter you indicated you had thrown away the on-line registration letter because you did not believe the requirement applied to self study courses. I informed you that it applies to all CE courses offered by Walls Insurance School. I sent you a new registration letter on May 28, 2008, yet our records indicate you still have not registered and submitted CE course rosters.

Failure to comply with these requirements can result in a fine pursuant to WAC 284-17-302 (5). Also, provider approval can be suspended or revoked pursuant to WAC 284-17-304.

We have received notice from 21 attendees of CE courses completed with Walls Insurance School since April 30, 2008. You are requested to enter all CE course rosters for courses completed since April 30, 2008. Please complete the roster submissions by July 11, 2008. Please contact us to verify you have complied with this request.

If you need assistance with the on-line registration process please contact me.

Sincerely,

Joe Mendoza  
Insurance Analyst - Education  
Office of Insurance Commissioner  
(360) 725-7146  
fax (360) 586-2019

EXHIBIT 6

PAGE 2

**Mendoza, Joe (OIC)**

---

**Subject:** FW: David Hart CE

---

**From:** [mulsgroup@aol.com](mailto:mulsgroup@aol.com) [<mailto:mulsgroup@aol.com>]  
**Sent:** Thursday, July 22, 2010 8:41 PM  
**To:** Mendoza, Joe  
**Subject:** Re: David Hart CE

Hi Joe,

I re-entered the roster last night. The interesting thing is the last time I tried to enter the same record, it was there and your last report did not show it missing. At times the web site starts blinking on a certain number or refuses to take information and I have to log out but it will not let me back in because it thinks our number is in use. Perhaps it freaked out on Mr. Hart's file and dumped the record. At any rate the poor guy is having problems with an eye surgery and is stuck in Phoenix because his doctor will not allow him to fly home.

Thanks, Pam

-----Original Message-----

**From:** Mendoza, Joe <[JoeM@OIC.WA.GOV](mailto:JoeM@OIC.WA.GOV)>  
**To:** [mulsgroup@aol.com](mailto:mulsgroup@aol.com)  
**Sent:** Wed, Jul 21, 2010 10:44 am  
**Subject:** David Hart CE

Hello Pam,

We do not have a roster on record. Apparently, when you tried to submit the roster you did not receive the confirmation. You can submit the roster using the on-line roster program.

I explained to Mr. Hart's administrative assistant that Mr. Hart could have entered the course by using the on-line license renewal program or by submitting the certificate with his renewal notice and payment. Either way, he could have renewed on-time.

JOE MENDOZA  
Program Analyst -Education  
Office of Insurance Commissioner  
P.O. Box 40257  
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[www.insurance.wa.gov](http://www.insurance.wa.gov)

EXHIBIT 6 PAGE 5

**Mendoza, Joe (OIC)**

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**Subject:** FW: David Hart CE

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**From:** Mendoza, Joe  
**Sent:** Friday, July 23, 2010 8:54 AM  
**To:** 'mulsgroup@aol.com'  
**Cc:** Baughman, Jeff (OIC)  
**Subject:** RE: David Hart CE

Hello Pam,

Here are three memos from our IT unit that may help you to correct your computer issues. Our IT person assures me there is no way for our SIMBA program to dump a roster. SIMBA can track every roster and see when it was entered and when it was modified. The SIMBA program creates a log of all activity separate from the roster. The log indicates the date and time and the person's user ID. Be sure to wait for the confirmation page. You can also re-access a roster by entering the same course information. If the roster is in the system it will come-up and you will be able to see the attendees that were entered.

Joe Mendoza

**1. Online User (Provider) that is having trouble logging into Online SIMBA**

**ERROR MESSAGE:**

*A user from this browser is already logged-in. Please try again with different browser instance.*

This typically is a local machine problem that is preventing the user from logging on and it is not something that IT can reset or undo.

**QUESTIONS/INSTRUCTIONS**

- 1) Does the user have another browser they can use instead of Internet Explorer? Ie. Firefox
- 2) Do they have a different computer they can use?
- 3) In some instances the users temporary folder was full and can be cleared by using the following instructions.
  - a. Within Internet Explorer select the **Tools** → **Internet Options** select the Delete Browsing History and then Delete again.

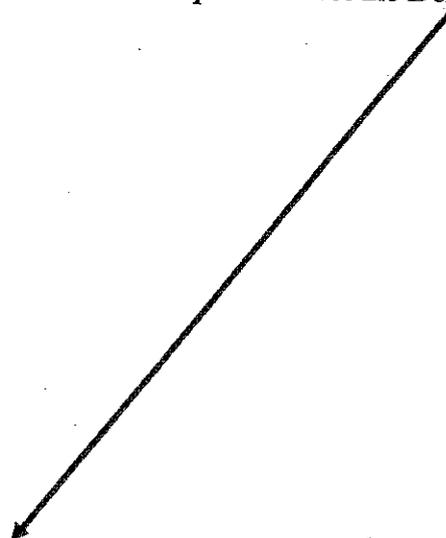
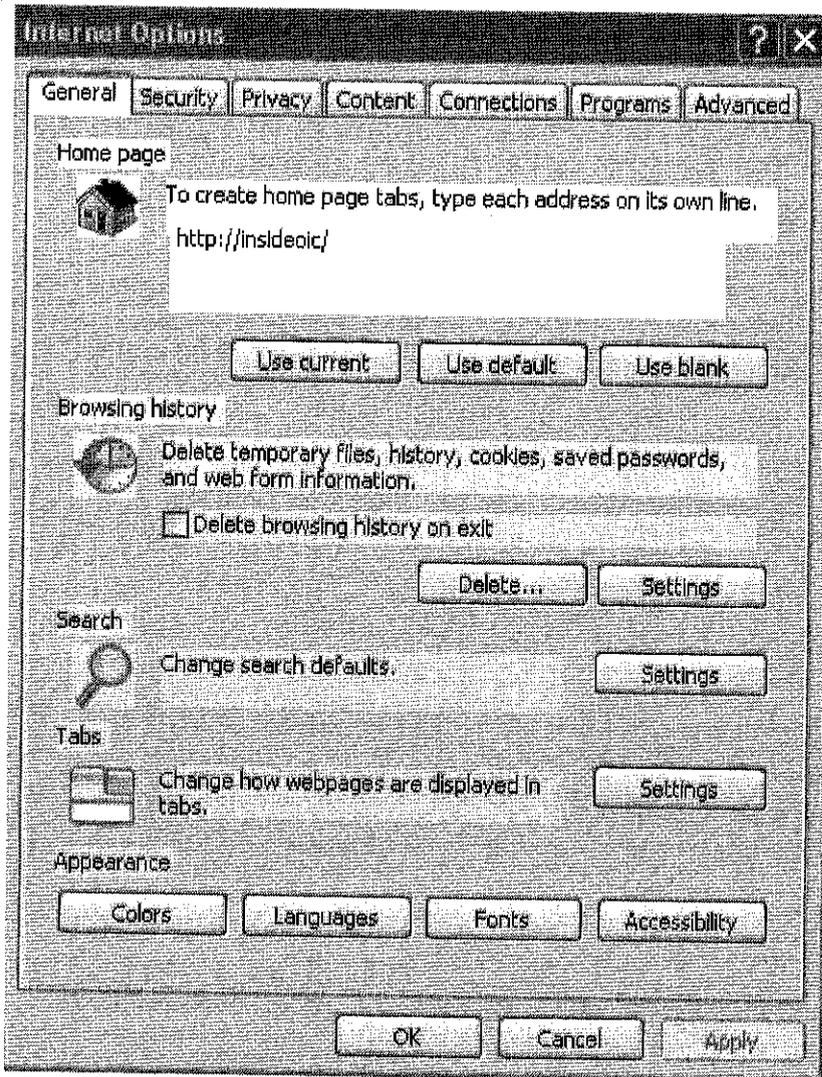
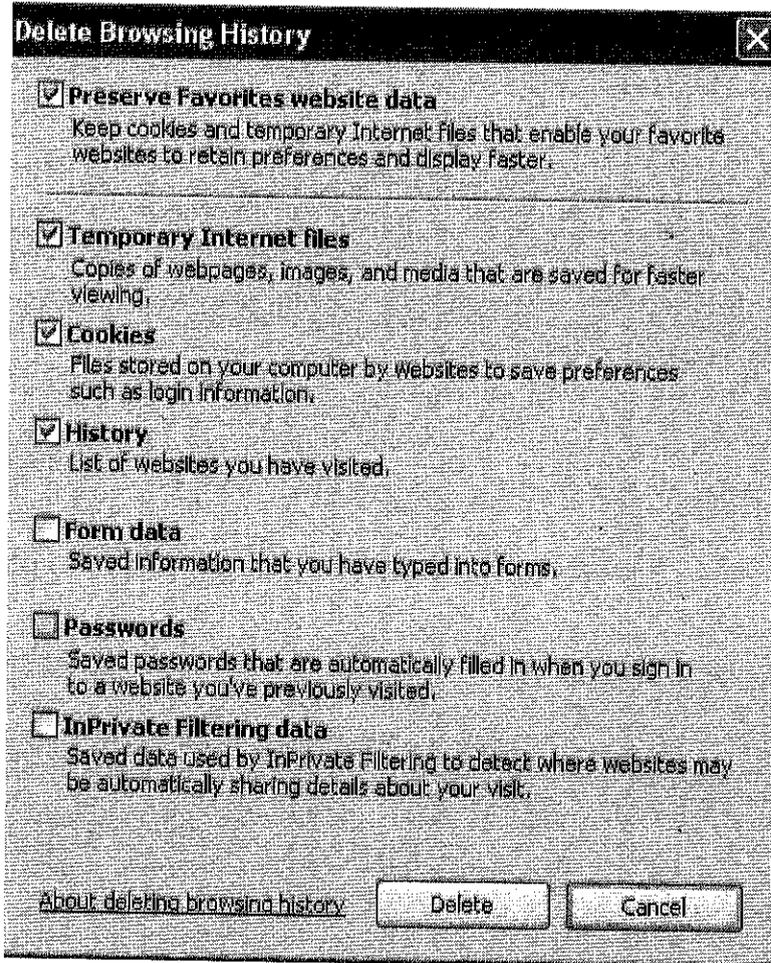


EXHIBIT 6 PAGE 6





2. "Page Flashes and Unable to Login/Register or Apply." This was called in by a producer trying to log-in, but this could also apply to a provider trying to log-in.

In most online related issues asking the top three questions would likely get them on their way.

- 1) Does the user have another browser they can use instead of Internet Explorer? Ie. Firefox
- 2) Do they have a different computer they can use?
- 3) In some instances the user's temporary folder was full and can be cleared.

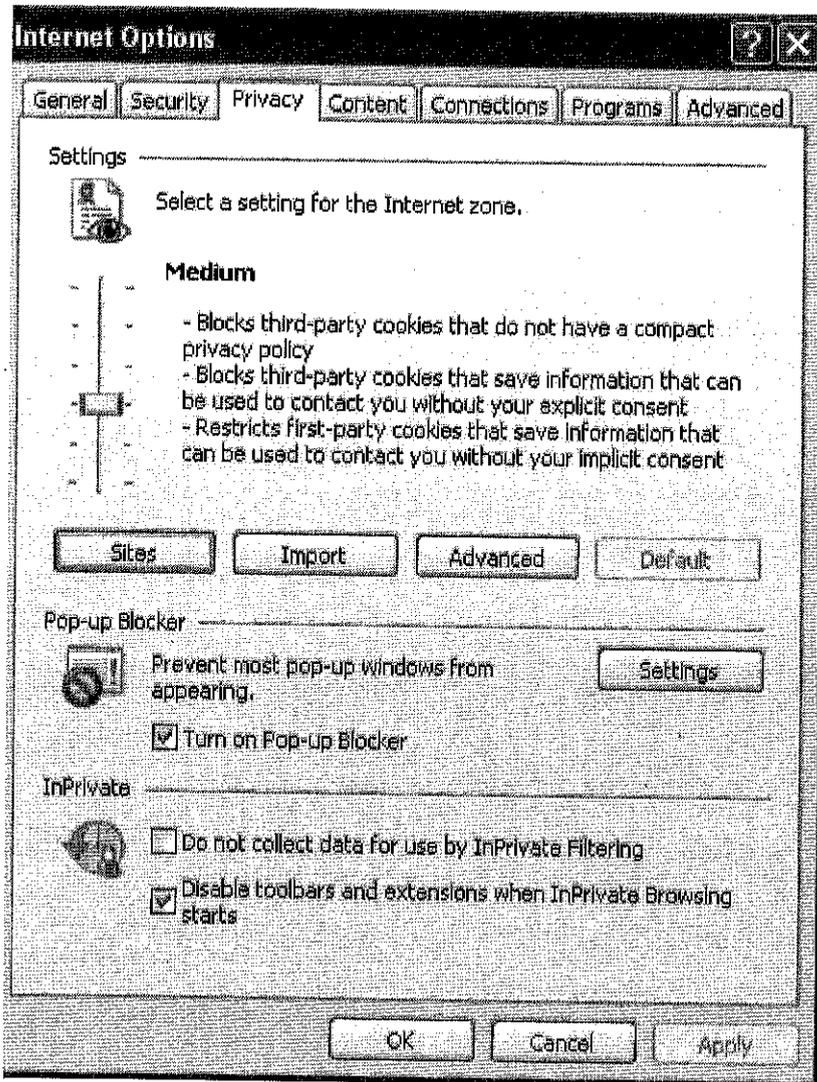
**ISSUE:**

A user is attempting to either Register/Login/Apply for a new license. When they do, the page might display **Session Expired** or just *flash* and appear not to have done anything. The user is unable to complete any online transactions including registering.

**CAUSE:**

The internet browser settings were blocking OIC pages. This was found from the internet browser **Tools** → **Internet Options** → select the **Privacy** Tab and select the **Sites** button.

EXHIBIT 6 PAGE 8



This is where you will notice the blocked oic websites. You will find the word fortress in the url. (ie. <https://fortress/oic.onlineservices>)

Per Site Privacy Actions



Manage Sites



You can specify which websites are always or never allowed to use cookies, regardless of their privacy policy.

Type the exact address of the website you want to manage, and then click Allow or Block.

To remove a site from the list of managed sites, select the name of the website and click the Remove button.

Address of website:

Block

Allow

Managed websites:

Domain	Setting
--------	---------

Remove

Remove all

OK

---

**3. The provider would complete the fields on the roster and select the Submit button and nothing would happen.**

I wanted to follow-up with you all regarding an issue a Provider had when entering a roster. Although this is a provider it could easily could impact licensees.

The provider would complete the fields on the roster and select the Submit button and nothing would happen. This is the same issue that plagued us when we moved to Internet Explorer 8.0. It has since been fixed but the user was accessing the Roster login by using an old link. I had her delete her old link and establish a new Favorite in her internet browser.

EXHIBIT 6 PAGE 11

**Mendoza, Joe (OIC)**

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**From:** Mendoza, Joe  
**Sent:** Monday, August 16, 2010 12:00 PM  
**To:** 'mulsgroup@aol.com'  
**Cc:** Mendoza, Joe  
**Subject:** WALLS CE AUDIT 7-29-10

WALLS INSURANCE AND SECURITIES SCHOOL  
M SCOTT REILLY  
555 116TH AVE NE STE 125  
BELLEVUE WA 98004

RE: WALLS CONTINUING EDUCATION AUDIT RESULTS 7-29-10

Scott, we completed our review of your continuing education records and this letter will provide you with our findings, comments and recommendations. We looked at 23 student files to review enrollment forms, certificates and exam scores. We also reviewed course files.

CE Course Records:

The file we reviewed only has course renewal notice letters dating back to March 2009. Not all course applications for current and recently cancelled courses are in the file. Except for one LTC course presentation, sign-in sheets are only kept for the Series 6 and 63 classes. Also, there is no record of the 10 day notice of presentation for lecture courses submitted to the OIC. Course certificates are kept in the individual student files.

*All CE course records must be kept for three years.*

Certificates:

The business practice is to present both Series 6 (20 hour course) and Series 63 (4 hour course) but only issues certificates for the Series 6 course.

*Certificates must be issued for the Series 63 course. This is a code requirement.*

Also, the WA LTC Initial 8 Hour Course is approved as a lecture course. In the two student records we reviewed, the certificate issued to the student indicates self study.

*The proper certificate must be issued for each course.*

Lecture Course Sign-in Sheets:

Walls School offers three lecture courses for continuing education. WA LTC Initial 8 Hour Course, Series 6 and Series 63. The business practice is to have students sign-in for the Series 6 and Series 63 classes but not the WA LTC Initial 8 Hour Course. Students initial their enrollment form to verify attendance for the LTC class.

We reviewed two student records with enrollment forms for the LTC class. One had initialed the enrollment form and the other had not.

We reviewed several sign-in sheets for the Series 6 and Series 63 courses. The top of the form has the class date and the class time. The students initialed and dated the sign-in and sign-out but did not indicate the time they arrived and left. There is no way to determine if a student arrived late or left early.

***All lecture courses require a sign-in register. The register must indicate the date and time the student signed-in and signed -out.***

10 Days to issue the Certificate:

We reviewed CE course records for on-line courses and for correspondence courses. On-line courses are often sold as a package with several courses included. The on-line self study computer program automatically scores the exams. The business practice is to ask students to submit all course exams together once completed. Therefore, a student might complete courses several weeks apart but submit all exams at once.

Each correspondence course exam is included in the textbook and the score sheet is mailed or faxed to Walls School and manually scored.

In a student record we reviewed, the courses were completed on May 26, May 27, May 28 and June 26, 2010. The course exam results were submitted to Walls School on June 26, 2010. Walls School then issued the certificates on June 28, 2010. Certificates were issued two days after receiving the exam results submitted by the student. However, the 10 day limitation to issue a certificate begins when the course is completed. For self study, this is when the provider grades the exam and confirms the passing score.

The certificates are not issued within 10 days of passing the exam but rather, they are issued within 10 days of the date the student submits the exam to Walls School. This can be several weeks after the student passed the exam.

***We considered this business practice and determined it is not compliant with WAC 284-17-272 . Certificates must be issued within 10 days of course completion. The completion date is the date the exam is scored to verify the passing score. Since this is done by computer, the certificate should be issued within 10 days of the date the exam is scored by the computer. Students should be asked to immediately submit the exam result for each course rather than wait until all courses are completed.***

10 Day Notice of Lecture Course Presentation:

Copies of the 10 day notice of presentation were not found in the records. The business practice is to offer lecture courses as the need arises and usually on short notice.

We reviewed the OIC's Late Roster Report and found several class dates indicated for the WA LTC Initial 8 Hour Course. The OIC was not notified of these presentations at least 10 days prior. Also, we are not receiving a 10 day notice for the Series 6 and 63 courses.

***The provider must give the OIC a 10 day notice of a presentation of an approved lecture course.***

10 Day Roster submission:

The OIC Education Aging Report indicates several courses reported by producers but not verified by Walls School with the on-line roster program. Course rosters must be submitted within 10 days of course completion. Walls School is notified every two months of the courses that were not verified by a roster.

EXHIBIT 6 PAGE 13

The OIC Late Roster Report shows a significant number of late rosters listed for Walls Insurance School. This means the course rosters were submitted after 10 days from the completion date indicated. The on-line roster program is the only accepted method of submitting rosters and all providers are expected to have access to the internet to use the on-line roster program..

***Rosters must be submitted electronically within 10 days of course completion. Walls School will be sent a copy of the OIC Late Roster Report so the staff can monitor their progress in reducing the number of rosters reported after 10 days.***

Web Site:

Using the link to Walls Insurance School from our OIC web page, we found several courses advertised on the Walls School web page that have expired. One course expired in 2000 and several expired over the past seven years.

We were informed that Walls School no longer uses the web address ([www.wallsinsuranceschool.com](http://www.wallsinsuranceschool.com)) for their CE courses. The current CE web site is [WallsCE.com](http://WallsCE.com). We suggest adding a link to the Walls CE web page from the Walls School PLE web page. We checked [WallsCE.com](http://WallsCE.com) and found several expired courses listed.

***Walls School agreed to remove the outdated CE course information from the [Wallsinsuranceschool.com](http://Wallsinsuranceschool.com) site and the [WallsCE.com](http://WallsCE.com) web site. If the information on the Walls School web page cannot be updated soon, we will temporarily disable the link (to the Walls web page) from the OIC PLE provider web page.***

Summary:

***Two previously discussed issues remain. The submission of on-line rosters within 10 days of course completion and keeping information up-to-date on the Walls School web page.***

***Course applications, course approval letters, course renewal letters must be kept for three years from the date the course is no longer active. Course sign-in sheets must be kept for three years from the date of the course.***

***Sign-in Sheets are required for all lecture courses. The sign-in sheet must indicate the time the student arrived and the time the student left.***

***Certificates for self study courses must be issued within 10 days of course completion.***

JOE MENDOZA  
Program Analyst -Education  
Office of Insurance Commissioner  
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Fax: (360) 586-2019  
joem@oic.wa.gov  
[www.insurance.wa.gov](http://www.insurance.wa.gov)

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**Mendoza, Joe (OIC)**

---

**From:** mulsgroup@aol.com  
**Sent:** Tuesday, March 22, 2011 8:21 PM  
**To:** Mendoza, Joe (OIC)  
**Subject:** web site

Joe,

For the last several days we have been trying to enter Continuing Education on the web site. The oic number field populates randomly or not at all. It starts flashing when the first number is entered and a pop up box appears. After I answer the pop up, it will not accept the record even if it decides to allow the field to work. Neither the reset nor the complete button work; it simply freezes. I cannot logout but have to exit the websit. Of course, then it thinks I am still logged in and will not let me do anything for at least half and hour. How am I supposed to comply with regulations when the site is chronically broken?

Ironically, every time we have a problem with our web site we are ordered to fix the problem in 10 days. This fatal problem on the commissioner's web site has occurred of and on for at least 2 years. Somebody it I.T. should certainly be able to figure this out. This problem is creating an undue burden on our business.

Thanks for your prompt attention to this matter,

Pam Reilly  
Wall's Training

EXHIBIT 6 PAGE 15

**Mendoza, Joe (OIC)**

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**Subject:** web site

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**From:** Mendoza, Joe (OIC)  
**Sent:** Wednesday, March 23, 2011 8:50 AM  
**To:** 'mulsgroup@aol.com'  
**Cc:** Baughman, Jeff (OIC)  
**Subject:** RE: web site

WALLS INSURANCE AND SECURITIES SCHOOL  
M SCOTT REILLY and PAM REILLY

Scott and Pam,

There has not been any issues with the roster program during the last several days. We have received several rosters.

You will need to check with your computer programmer to identify the issue. There are many factors that can affect the performance of your computer including hardware, software and settings. When you have a problem submitting a roster, it is best to send us a screen print so we can see what you are seeing on the roster page.

We have received thousands of rosters since March, 2008 and never a report about the issues you are describing. The pop-up boxes may be coming from your computer software and not from our web site. We would need to read the pop-up message to determine the cause.

I have attached a list of some common issues that have been reported in the past three years and how to resolve them. However, these issues are not of the type you are describing.

If you do not receive a confirmation page the roster did not submit. There are several reasons the roster may not submit. Here are a few of the most common:

1. **The user clicked on "Select All". The boxes on the right side of the form have a check mark.** The boxes are only used to delete information. Uncheck the boxes.
2. **The user entered a license number then hit "add" again before the licensee's name had populated.** This can lock-up the roster. Best to use the tab key on your keyboard after entering a license number and wait for the name to appear before proceeding. Delete the licensees that have been entered. You may have to "Reset" the roster if deleting does not work.
3. **The user entered a license number then realized it was incorrect and typed over it.** Delete the license number by clicking the box on the right then select "delete". Then select "add" to re-enter the license number.
4. **There is an error message after entering a license number.** You need to delete that licensee from the roster. Either the licensee already completed the course or the licensee already entered the course but used the wrong completion date. Make a note of the error message.
5. **The user is accessing the On-line Services log-in page using an old link.** Here is the proper link:  
<https://fortress.wa.gov/oic/onlineservices/Login.aspx?module=PRV>
6. **Using our on-line roster program requires Internet Explorer or Firefox**

JOE MENDOZA  
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[www.insurance.wa.gov](http://www.insurance.wa.gov)

EXHIBIT 6 PAGE 17

**Mendoza, Joe (OIC)**

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**From:** Mendoza, Joe (OIC)  
**Sent:** Monday, April 25, 2011 9:54 AM  
**To:** 'mulsgroup@aol.com'  
**Cc:** Baughman, Jeff (OIC)  
**Subject:** LATE ROSTERS and LATE CERTIFICATES  
**Attachments:** 20110425\_085647.pdf

**Importance:** High

**Follow Up Flag:** Follow up  
**Flag Status:** Flagged

WALLS INSURANCE AND SECURITIES SCHOOL 24961  
M SCOTT REILLY

RE: LATE ROSTERS and LATE CERTIFICATES

Scott,

We are conducting a survey of continuing education courses. We have requested certificates from producers to verify courses they reported.

The attached certificates indicate four courses were completed on February 21, 2011 but the certificates were certified by Megan Reilly on March 21, 2011. This indicates that the certificates were issued a month after the courses were completed. Also, we do not have rosters for these courses.

These are both violations of the Washington Administrative Code. Rosters must be submitted and certificates issued within 10 days of course completion.

The Office of Insurance Commissioner has notified you and your staff of these requirements on several occasions in the past. Yet we continue to see late rosters and late certificates issued to producers. As a continuing education provider, you must adhere to the provider requirements indicated in the Washington Administrative Code.

Producers rely on you to promptly submit their course roster and issue their certificate so they can renew their license without paying a late fee. When you do not submit their roster, they are further inconvenienced because they have to send us their course certificate.

**Please review your procedures for reporting rosters and issuing certificates and send us a written confirmation regarding the changes that will be implemented by your office to adhere to these code requirements. Send us the letter within 15 days.**

Sincerely,

JOE MENDOZA  
Program Analyst  
Licensing and Education  
Office of Insurance Commissioner  
(360) 725-7146  
Fax: (360) 586-2019  
[joem@oic.wa.gov](mailto:joem@oic.wa.gov)  
[www.insurance.wa.gov](http://www.insurance.wa.gov)

EXHIBIT 6 PAGE 18

**Reid, Ken M. (Genworth)**

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**From:** Mendoza, Joe (OIC) [JoeM@OIC.WA.GOV]  
**Sent:** Friday, April 22, 2011 4:28 PM  
**To:** Reid, Ken M. (Genworth)  
**Subject:** CE SURVEY JAN FEB 2011

**Importance:** High

RE: CE SURVEY JAN FEB 2011

Dear Producer,

You submitted the following course information when you renewed your insurance license. These courses were not verified by the provider. Please send us a copy of each course certificate.

Send the certificates to [joem@oic.wa.gov](mailto:joem@oic.wa.gov) by **May 10, 2011**.

WAOIC # Producer	Course #	Provider	Provider #	Completion Date Reported
70202	606269	WALLS	24961	02/21/2011
70202	604237		24961	02/21/2011
70202	606357		24961	02/21/2011
70202	603549		24961	02/21/2011

JOE MENDOZA  
Program Analyst  
Licensing and Education  
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[www.insurance.wa.gov](http://www.insurance.wa.gov)

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Visit our website at [www.insurance.wa.gov](http://www.insurance.wa.gov)

You will find news releases, advisories, administrative actions and information regarding consumers, insurers and licensees.

- Licensee/Insurer lookup program that allows you to check the status of any license, appointment or affiliation.
- Licensing information containing instructions, forms and fees for all types of licensees and information for CE providers.

• Online Services:

◦ For Licensees

**Individual - Must register/login**

- License renewal
- Change address, name or DBA
- Print license(s), appointment(s) or affiliation(s)
- View education history or current profile
- View pending online request
- Add a new license type
- Reinstate or reapply for a previous licensee
- Update CRD# to add Variable LOA
- View list of appointments & affiliations

**Business Entity— Must register/login**

- License, affiliation and branch renewal
- Change address, name, branch or DBA
- Print license(s), appointment(s) or affiliation(s)
- View pending online request
- Add or cancel an affiliation
- View current profile
- Print unpaid invoice
- Reinstate or reapply for a previous licensee
- Update CRD# to add Variable LOA
- View list of appointments & affiliations

- For First Time Applicants - individuals and business entities can submit and track their online applications.

If you have not registered to use our Online Services, you may request a registration letter by calling 360-725-7144 or by emailing [licinfo@oic.wa.gov](mailto:licinfo@oic.wa.gov).

Beginning June 1, 2011, renewal notices will be emailed to your registered email address 45-60 days prior to your license expiration date. It is vital that you maintain your current email address.

If acting in a broker capacity, please note that a producer is required to have a bond in place prior to placing business.

New rules which affect your insurance license – Licensing must now be done online!

Check out the new rules at : [www.insurance.wa.gov](http://www.insurance.wa.gov), then select the Agents/Brokers tab, then select the "Attention Licensees" icon.

*Michael ... 766 4327*

Cur Here Cur Here Cur Here Cur Here Cur Here Cur Here

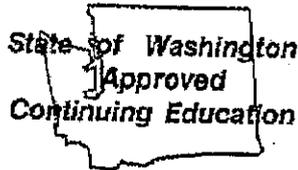
**\* \* \* INSURANCE PRODUCER LICENSE \* \* \***

WAOIC # : 70202  
EFFECTIVE : 07/01/2009  
EXPIRES : 05/02/2013  
KENNETH M RRID  
4427 NE 187TH PL  
LAKE FOREST PARK WA 98155

THE LICENSEE IS AUTHORIZED TO SELL THE FOLLOWING  
LINES OF INSURANCE:  
Property, Casualty

THIS LICENSE MUST BE ACCOMPANIED BY A CURRENT  
APPOINTMENT OR AFFILIATION FOR EACH INSURER OR  
BUSINESS ENTITY REPRESENTED.

**EXHIBIT** 6 **PAGE** 20



CERTIFICATE OF COMPLETION
INSURANCE
SELF STUDY COURSE

STUDENT NAME: Kenneth M. Reid

CONTINUING EDUCATION COURSE IDENTIFICATION

Course Title: Annuities

Course Certification Number: 606269

Ethics content 01 hours Total Number of Credit Hours: 03

Provider's Name: Wall's Insurance and Securities School

Provider's Number: 24961

Course Completion Date: 2/21/11

PROVIDER CERTIFICATION

I hereby certify that this course was conducted as approved by the Washington State Office of the Insurance Commissioner.

Name: Megan Reilly, Administrative Assistant

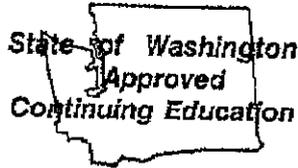
Signature: [Signature] Date: 3/21/2011

STUDENT CERTIFICATION

I hereby certify that I personally completed the course listed above in the manner required to satisfy the continuing education regulation.

WAOIC#: 70202

Signature: [Signature] Date: 3/21/11



CERTIFICATE OF COMPLETION
INSURANCE
SELF STUDY COURSE

STUDENT NAME: Kenneth M. Reid

CONTINUING EDUCATION COURSE IDENTIFICATION

Course Title Introduction to Annuities

Course Certification Number: 604237

Ethics content 01 hours Total Number of Credit Hours: 04

Provider's Name: Wall's Insurance and Securities School

Provider's Number: 24961

Course Completion Date: 2/21/11

PROVIDER CERTIFICATION

I hereby certify that this course was conducted as approved by the Washington State Office of the Insurance Commissioner.

Name: Megan Reilly, Administrative Assistant

Signature: [Signature] Date: 3/21/2011

STUDENT CERTIFICATION

I hereby certify that I personally completed the course listed above in the manner required to satisfy the continuing education regulation.

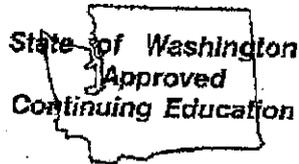
WAOIC# 70202

Signature: Kenneth M. Reid Date: 3/21/11

This certificate is valid for 24 months from the completion date.

CERT 0405 (08/09).DOC

EXHIBIT 6 PAGE 22



**CERTIFICATE OF COMPLETION  
INSURANCE  
SELF STUDY COURSE**

**STUDENT NAME:** Kenneth M. Reid

**CONTINUING EDUCATION COURSE IDENTIFICATION**

Course Title Tax Sheltered Annuities

Course Certification Number: 606357

Ethics content 01 hours Total Number of Credit Hours: 04

Provider's Name: Wall's Insurance and Securities School

Provider's Number: 24961

Course Completion Date: 2/21/11

**PROVIDER CERTIFICATION**

*I hereby certify that this course was conducted as approved by the Washington State Office of the Insurance Commissioner.*

Name: Megan Reilly, Administrative Assistant

Signature:  Date: 3/21/2011

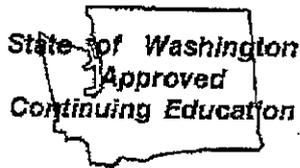
**STUDENT CERTIFICATION**

*I hereby certify that I personally completed the course listed above in the manner required to satisfy the continuing education regulation.*

WAOIC# 70202

Signature:  Date: 3/21/11

This certificate is valid for 24 months from the completion date.



**CERTIFICATE OF COMPLETION  
INSURANCE  
SELF STUDY COURSE**

**STUDENT NAME:** Kenneth M. Reid

**CONTINUING EDUCATION COURSE IDENTIFICATION**

Course Title Long Term Care

Course Certification Number: 604592

Ethics content 00 hours Total Number of Credit Hours: 09

Provider's Name: Wall's Insurance and Securities School

Provider's Number: 24961

Course Completion Date: 3/21/11

**PROVIDER CERTIFICATION**

*I hereby certify that this course was conducted as approved by the Washington State Office of the Insurance Commissioner.*

Name: Megan Reilly, Administrative Assistant

Signature: [Signature] Date: 3/21/2011

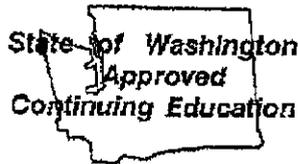
**STUDENT CERTIFICATION**

*I hereby certify that I personally completed the course listed above in the manner required to satisfy the continuing education regulation.*

WAOIC# 70202

Signature: Kenneth M. Reid Date: 3/21/11

This certificate is valid for 24 months from the completion date. CERT 0405 (08/09).DOC



CERTIFICATE OF COMPLETION  
INSURANCE

SELF STUDY COURSE

STUDENT NAME: Kenneth M. Reid

CONTINUING EDUCATION COURSE IDENTIFICATION

Course Title 401 (k) Plans

Course Certification Number: 603549

Ethics content 00 hours Total Number of Credit Hours: 04

Provider's Name: Wall's Insurance and Securities School

Provider's Number: 24961

Course Completion Date: 2/21/11

PROVIDER CERTIFICATION

*I hereby certify that this course was conducted as approved by the Washington State Office of the Insurance Commissioner.*

Name: Megan Reilly, Administrative Assistant

Signature: [Signature] Date: 3/21/2011

STUDENT CERTIFICATION

*I hereby certify that I personally completed the course listed above in the manner required to satisfy the continuing education regulation.*

WAOIC# 70202

Signature: [Signature] Date: 3/21/11

This certificate is valid for 24 months from the completion date. CERT 0405 (08/09).DOC

**Mendoza, Joe (OIC)**

---

**Subject:** FW: LATE ROSTERS and LATE CERTIFICATES  
**Attachments:** 20110425\_085647.pdf

**Importance:** High

---

**From:** Mendoza, Joe (OIC)  
**Sent:** Friday, May 13, 2011 3:56 PM  
**To:** 'mulsgroup@aol.com'  
**Cc:** Baughman, Jeff (OIC)  
**Subject:** LATE ROSTERS and LATE CERTIFICATES  
**Importance:** High

WALLS INSURANCE AND SECURITIES SCHOOL 24961  
M SCOTT REILLY

RE: LATE ROSTERS and LATE CERTIFICATES

Scott,

I received Pam's reply to the e-mail I sent you on April 25, 2011.

On a regular basis, we survey courses submitted by producers when they renew their license on-line. I wrote to you about several certificates that were issued by your office staff more than 10 days after the course completion dates. Also, several course rosters were not submitted within the 10 day requirement.

On July 29, 2010, we audited your continuing education course records and discussed the self study programs you offer. You offer two methods for students to complete their self study courses. You have an on-line program and a correspondence program.

In my letter to you on August 16, 2010, I informed you the completion date is the date the exam is graded and a passing score is determined. Certificates must be issued and the on-line roster must be submitted within 10 days of the completion date.

**Correspondence Self Study Course**

We agree a student has not completed a correspondence self study course until you receive their exam to be graded. The student must pass the exam with a score of 70% or better. Submitting the exam to you for grading is part of the requirement to complete the correspondence self study course.

**On-line Self Study Courses**

For on-line self study courses, you indicated students complete the exam on-line and the computer program grades the exam. The student must print the exam result and send it to you to receive a certificate.

Based on the certificates we have reviewed recently, certificates are being issued several weeks after the on-line exam is graded by the computer program.

Pam indicated in her letter dated May 10, 2011, that you will advise your students to submit the exam result immediately. However, the student's delay will not relieve you of the 10 day requirement. If the student does not

EXHIBIT 6 PAGE 26

send you the exam result immediately, then you will may not be able to comply with the 10 day requirement. It may be more efficient to allow the student to print their certificate once the computer program grades the exam.

Pam suggested, as an alternative solution, to use the date you receive the exam result as the completion date. That is not acceptable for the reasons indicated above.

As a approved provider of insurance education in Washington, your procedures must fulfill the requirements set forth in the Washington Administrative Code. Please immediately implement procedures that will ensure your successful compliance with the regulations.

If you have any questions, please contact me.

JOE MENDOZA  
Program Analyst  
Licensing and Education  
Office of Insurance Commissioner  
(360) 725-7146  
Fax: (360) 586-2019  
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[www.insurance.wa.gov](http://www.insurance.wa.gov)

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**Mendoza, Joe (OIC)**

---

**Subject:** FW: LATE ROSTERS and LATE CERTIFICATES  
**Attachments:** 20110425\_085647.pdf  
**Importance:** High

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**From:** Mendoza, Joe (OIC)  
**Sent:** Wednesday, May 11, 2011 10:04 AM  
**To:** 'mulsgroup@aol.com'  
**Cc:** Baughman, Jeff (OIC)  
**Subject:** FW: LATE ROSTERS and LATE CERTIFICATES  
**Importance:** High

Scott,

We have not received a reply to our request attached below. Your reply is overdue. I will be out of the office tomorrow. Please submit the requested information by Friday, May 13, 2011 at 8:00 am.

**Please review your procedures for reporting rosters and issuing certificates and send us a written confirmation regarding the changes that will be implemented by your office to adhere to these code requirements.**

I would also like to point out that we discussed this issue at your audit last year.

JOE MENDOZA  
Program Analyst  
Licensing and Education  
Office of Insurance Commissioner  
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[www.insurance.wa.gov](http://www.insurance.wa.gov)

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**Mendoza, Joe (OIC)**

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**Subject:** FW: CE SURVEY JAN FEB 2011

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**From:** Mendoza, Joe (OIC)  
**Sent:** Thursday, May 26, 2011 8:06 AM  
**To:** 'mulsgroup@aol.com'  
**Subject:** RE: CE SURVEY JAN FEB 2011

Pam,

Apparently, a virus has gotten into your computer. You may have to use a different computer. Let me know when you are able to enter him on the roster.

JOE MENDOZA  
Program Analyst  
Licensing and Education  
Office of Insurance Commissioner  
(360) 725-7146  
Fax: (360) 586-2019  
[joem@oic.wa.gov](mailto:joem@oic.wa.gov)  
[www.insurance.wa.gov](http://www.insurance.wa.gov)

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**From:** [mulsgroup@aol.com](mailto:mulsgroup@aol.com) [<mailto:mulsgroup@aol.com>]  
**Sent:** Wednesday, May 25, 2011 9:25 PM  
**To:** Mendoza, Joe (OIC)  
**Subject:** Re: CE SURVEY JAN FEB 2011

Joe,  
As I try to enter the rosters, the oic # field and the purchase date field randomly starting adding commas and repeating the number I enter. I cannot delete the addition of the random comma fast enough. I have to quit the site but it will not let me back in for 1/2 hour because I cannot logout but have to hit exit. This makes it very difficult to add rosters because the random comma adding happens every several records.  
Pam

=====

EXHIBIT 6 PAGE 29

**Mendoza, Joe (OIC)**

---

**Subject:** FW: CE SURVEY JAN FEB 2011

-----Original Message-----

**From:** Mendoza, Joe (OIC) <[JoeM@OIC.WA.GOV](mailto:JoeM@OIC.WA.GOV)>

**To:** [mulsgroup@aol.com](mailto:mulsgroup@aol.com)

**Sent:** Tue, May 24, 2011 8:14 am

**Subject:** FW: CE SURVEY JAN FEB 2011

This is due by tomorrow.

---

**From:** Mendoza, Joe (OIC)

**Sent:** Tuesday, May 10, 2011 3:08 PM

**To:** '[mulsgroup@aol.com](mailto:mulsgroup@aol.com)'

**Cc:** Baughman, Jeff (OIC)

**Subject:** FW: CE SURVEY JAN FEB 2011

**Importance:** High

WALLS INSURANCE AND SECURITIES SCHOOL 24961

RE: THUY NGUYEN

WAOIC # 116850

Scott,

We received the attached certificates indicating THUY NGUYEN completed these five self study courses on February 1, 2011. There are rosters in our system for these courses with other students listed. Mr. NGUYEN is not among the producers listed on the rosters.

Please check your records to verify these certificates are valid. If they are valid, add Mr. NGUYEN to the appropriate rosters immediately. The rosters for his courses are late.

Also, be sure the producers on those rosters are correct. Perhaps the wrong person was added.

Please send me a confirmation by May 25, 2011 to confirm this is done.

JOE MENDOZA

Program Analyst

Licensing and Education

Office of Insurance Commissioner

(360) 725-7146

Fax: (360) 586-2019

[joem@oic.wa.gov](mailto:joem@oic.wa.gov)

[www.insurance.wa.gov](http://www.insurance.wa.gov)

EXHIBIT 6 PAGE 30

**Mendoza, Joe (OIC)**

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**Subject:** FW: CE SURVEY JAN FEB 2011

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**From:** Mendoza, Joe (OIC)  
**Sent:** Friday, April 22, 2011 4:19 PM  
**To:** 'nguthh@yahoo.com'  
**Subject:** CE SURVEY JAN FEB 2011  
**Importance:** High

RE: CE SURVEY JAN FEB 2011

Dear Producer,

You submitted the following course information when you renewed your insurance license. These courses were not verified by the provider. Please send us a copy of each course certificate.

Send the certificates to [joem@oic.wa.gov](mailto:joem@oic.wa.gov) by **May 10, 2011**.

WAOIC # Producer	Course #	Provider	Provider #	Completion Date Reported
116850	604592	WALLS	24961	02/01/2011
116850	606357		24961	02/01/2011
116850	604237		24961	02/01/2011
116850	606269		24961	02/01/2011

JOE MENDOZA  
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[www.insurance.wa.gov](http://www.insurance.wa.gov)

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CONFIDENTIALITY NOTICE: If you have received this email in error, please immediately notify the sender by e-mail at the address shown. This email transmission may contain confidential information. This information is intended only for the use of the individual(s) or entity to whom it is intended even if addressed incorrectly. Please delete it from your files if you

**Mendoza, Joe (OIC)**

**Subject:** FW: CE SURVEY MAR APR 2011 Courses not verified with a roster.

**From:** Mendoza, Joe (OIC)  
**Sent:** Thursday, June 02, 2011 11:21 AM  
**To:** 'mulsgroup@aol.com'  
**Subject:** CE SURVEY MAR APR 2011 Courses not verified with a roster.  
**Importance:** High

Education Aging Report March - April 2011

We did not receive a roster for these courses. **Please check your records and reply by June 7, 2011.**

1. If the completion date is correct, the roster is late. **Submit the roster immediately.**
2. If the course completion date is incorrect, please **send me the correct course completion date.**

WAOIC #	Course #	Provider #	Course Completion Date as Reported
70202	604592	24961	03/21/2011
179404	604151	24961	04/05/2011
160584	603552	24961	03/02/2011
160584	603549	24961	03/02/2011
160584	606357	24961	03/02/2011
160584	606269	24961	03/01/2011
160584	604237	24961	03/02/2011
160584	603551	24961	03/03/2011
160584	604786	24961	03/02/2011
242207	604237	24961	03/08/2011
242207	606355	24961	03/08/2011
242207	606356	24961	03/08/2011

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242207	606269	24961	03/08/2011
242207	604592	24961	03/08/2011
242207	606357	24961	03/08/2011
48230	606355	24961	03/20/2011
69694	604592	24961	04/12/2011
136329	604592	24961	03/10/2011
136329	605410	24961	03/10/2011
136329	605573	24961	03/10/2011
725212	604592	24961	04/10/2011
725212	606357	24961	03/19/2011
725212	606269	24961	03/13/2011
725212	604237	24961	03/06/2011
162525	605410	24961	03/22/2011
162525	605573	24961	03/22/2011
162525	604592	24961	03/09/2011
162525	604301	24961	03/09/2011
245168	605573	24961	03/15/2011
245168	605410	24961	03/15/2011
245168	604592	24961	03/09/2011
720505	605573	24961	04/30/2011
190914	606357	24961	04/28/2011

EXHIBIT 6 PAGE 33

JOE MENDOZA  
Program Analyst  
Licensing and Education  
Office of Insurance Commissioner  
(360) 725-7146  
Fax: (360) 586-2019  
[joem@oic.wa.gov](mailto:joem@oic.wa.gov)  
[www.insurance.wa.gov](http://www.insurance.wa.gov)

EXHIBIT 6 PAGE 34

**Mendoza, Joe (OIC)**

---

**Subject:** FW: CE SURVEY MAR APR 2011 Courses not verified with a roster.

---

**From:** [mulsgroup@aol.com](mailto:mulsgroup@aol.com) [<mailto:mulsgroup@aol.com>]

**Sent:** Friday, June 17, 2011 8:59 AM

**To:** Mendoza, Joe (OIC)

**Subject:** Re: CE SURVEY MAR APR 2011 Courses not verified with a roster.

Sorry Joe. Our printer was on the fritz. I re-entered the correct and there was one case of incorrect Waoic. I will fax the corrections as soon as I get into the office this morning.

Thanks, Pam

-----Original Message-----

From: Mendoza, Joe (OIC) <[JoeM@OIC.WA.GOV](mailto:JoeM@OIC.WA.GOV)>

To: [mulsgroup@aol.com](mailto:mulsgroup@aol.com)

Cc: Baughman, Jeff (OIC) <[JeffB@OIC.WA.GOV](mailto:JeffB@OIC.WA.GOV)>

Sent: Thu, Jun 16, 2011 1:21 pm

Subject: FW: CE SURVEY MAR APR 2011 Courses not verified with a roster.

WALLS INSURANCE AND SECURITIES SCHOOL 24961

We have not received your reply to this request that was due June 7, 2011. Send us a reply by Monday, June 20, 2011.

JOE MENDOZA

Program Analyst

Licensing and Education

Office of Insurance Commissioner

(360) 725-7146

Fax: (360) 586-2019

[joem@oic.wa.gov](mailto:joem@oic.wa.gov)

[www.insurance.wa.gov](http://www.insurance.wa.gov)

EXHIBIT 6

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**WALL'S INSURANCE AND SECURITIES SCHOOL**

555 116th Ave N.E. Suite 125, Bellevue, WA 98004

425-990-3366

Fax: 425-990-3369

www.wallsschool.com

www.wallsce.com

**FAX COVER PAGE**

NAME: Joe Mendoza DATE: June 17, 2011

COMPANY: Office of Insurance Commissioner

FAX NUMBER: 360-586-7446 2019

NUMBER OF PAGES (COVER INCLUDED): 3

Michael S. Miller - oic # 180463

are all incorrect - Should have been Michael T. Miller

Please delete his CE from Walls - 24961

Course #'s 604592, 606269, 604237, 605573, 603549,  
603551

EXHIBIT 6 PAGE 36

**FIND WEIGHT LOSS SUCCESS  
BY LEARNING A NEW WAY  
TO EAT**

**PointsPlus**  
program



**WeightWatchers**  
**SEE HOW**

multigroup Sign Out

Check Mail Compose

Search the Web

Search enhanced by

Themes | Settings | Help

Search Mail

Reply Forward Action Delete Spam

Today on AOL

**FW: CE SURVEY MAR APR 2011 Courses not verified with a roster.**

Mendoza, Joe (OIC) to you and Baughman, Jeff (OIC) - yesterday More Details

Add to: To Do, Calendar

- New Mail 33
- Old Mail
- Drafts 1
- Sent
- IMs
- Spam 3
- Recently Deleted
- Contacts
- Calendar
- My Folders
- Saved Mail
- Recovered ... 559
- Recovered ... 147

			Reported
70202	604592	24961	03/21/2011
179404	604151	24961	04/05/2011
160584	603552	24961	03/02/2011
160584	603549	24961	03/02/2011
160584	606357	24961	03/02/2011
160584	606269	24961	03/01/2011
160584	604237	24961	03/02/2011
160584	603551	24961	03/03/2011
160584	604786	24961	03/02/2011
242207	604237	24961	03/08/2011
242207	606355	24961	03/08/2011
242207	606356	24961	03/08/2011
242207	606269	24961	03/08/2011
242207	604592	24961	03/08/2011

15730 606357 " 3/20/2011

69694 604592 4/12/2011

134329 604592 3-10-2011

" 605410 "

" 605373 "

These have been verified + corrected

As of June 7, 2011

EXHIBIT 6 PAGE 37



multigroup Sign Out

Check Mail Compose

Search the Web

Search enhanced by

Themes | Settings | Help

Search Mail

Reply

Forward

Action

Delete

Spam

Today on AOL

**FW: CE SURVEY MAR APR 2011 Courses not verified with a roster.**

Mendoza, Joe (OIC) to you and Baughman, Jeff (OIC) - yesterday [More Details](#)

[Add to: To Do, Calendar](#)

New Mail 33

Old Mail

Drafts 1

Sent

IMs

Spam 3

Recently Deleted

Contacts

Calendar

My Folders

Saved Mail

Recovered ... 559

Recovered ... 147

725212	604237	24961	03/06/2011
162525	605410	24961	03/22/2011
162525	605573	24961	03/22/2011
162525	604592	24961	03/09/2011
162525	604301	24961	03/09/2011
245168	605573	24961	03/15/2011
245168	605410	24961	03/15/2011
245168	604592	24961	03/09/2011
720505	605573	24961	04/30/2011
190914	606357	24961	04/28/2011

JOE MENDOZA  
 Program Analyst  
 Licensing and Education  
 Office of Insurance Commissioner

EXHIBIT 6 PAGE 38

Joe Mendoze .

360-586-2019

Pam Rilly

425-990-3369

The only one I cannot explain  
746102 Richard Bernier. Most of  
them were missed.

Thanks for ~~the~~ report.

Pam

From: Mendoza, Joe (OIC) <JoeM@OIC.WA.GOV>

To: mulagroup@aol.com

Subject: CE SURVEY MAY JUNE 2011

Date: Fri, Jul 22, 2011 10:07 am

WALLS INSURANCE AND SECURITIES SCHOOL  
M SCOTT REILLY

Here is your list of CE courses reported by producers in May and June 2011. We have not received the roster yet.

If the completion date is incorrect, send me the correct completion date so we can update our system. Otherwise, submit the roster immediately.

WAOIC #	Course #	Provider #	Completion Date Reported
212053	606356	24961	05/19/2011
212053	604786	24961	05/19/2011
190914	604592	24961	05/24/2011 ✓
190914	606269	24961	05/10/2011 ✓
190914	604237	24961	05/24/2011 ✓
746102	604237	24961	05/22/2011
764672	604592	24961	05/25/2011 ✓
764672	606357	24961	05/24/2011 ✓
764672	604237	24961	05/24/2011 ✓
764672	606269	24961	05/24/2011 ✓
764672	603549	24961	05/25/2011 ✓
751797	604592	24961	06/14/2011 ✓
715482	606357	24961	06/15/2011 ✓
715482	604237	24961	06/02/2011 ✓
715482	604592	24961	06/16/2011 ✓

Michael Passage Submitted 8/2

Keri Pomeroy Submitted 8/2

Richard Bernier I could not find this one  
Dannelle Brown

Submitted 8/2

Eric Barnes Submitted 8/2

EXHIBIT 6 PAGE 40

David Ross

715482	606269	24961	06/14/2011
715482	603549	24961	06/17/2011
762147	606269	24961	06/28/2011
762147	603549	24961	06/27/2011
181075	604237	24961	06/29/2011
712390	606269	24961	06/30/2011
712390	603551	24961	06/30/2011
712390	606357	24961	06/30/2011
721402	604301	24961	06/24/2011

Dana, n  
 Lawson  
 Linda  
 Shubbs  
 Matthew  
 Finch  
 entered 7/28/2011  
 Josephine  
 Yang - former  
 entered 7/24

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[joem@oic.wa.gov](mailto:joem@oic.wa.gov)  
[www.insurance.wa.gov](http://www.insurance.wa.gov)

From: Mendoza, Joe (OIC) (OIC) <Joem@OIC.WA.GOV>  
 To: mulsgroup <mulsgroup@aol.com>  
 Subject: CE SURVEY JULY AUGUST 2011  
 Date: Wed, Oct 5, 2011 4:57 pm

WALLS INSURANCE AND SECURITIES SCHOOL  
 M SCOTT REILLY

Please check these completion dates. Are they correct? We did not receive rosters. Please respond within 15 days.

If they are incorrect, we will need to correct the date before you can submit a roster.

If they are correct, you will need to submit the roster immediately.

WAOIC #	Course #	Provider #	Completion Date		
181075	606357	24961	07/08/2011	✓	Linda Stubbler
156039	604592	24961	07/13/2011	✓	} Theresa Lee
156039	606357	24961	07/13/2011	✓	
727327	603551	24961	07/23/2011	✓	Brian Jason
720846	606269	24961	07/19/2011	✓	Bob Lin
187754	604592	24961	08/23/2011	✓	Travis Sanders

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[www.insurance.wa.gov](http://www.insurance.wa.gov)

*Completed  
 10/14/2011  
 PJR*

**Mendoza, Joe (OIC)**

---

**Subject:** FW: SIMBA CE module issue PCHelp\_15691

---

**From:** Shea, Mike (OIC) **On Behalf Of** OIC PCHelp  
**Sent:** Thursday, August 18, 2011 7:35 AM  
**To:** Whiton, Lisa (OIC)  
**Subject:** FW: SIMBA CE module issue

Screenshot for Jeff B's SIMBA CE ticket.

---

**From:** Baughman, Jeff (OIC)  
**Sent:** Thursday, August 18, 2011 6:54 AM  
**To:** OIC PCHelp  
**Subject:** SIMBA CE module issue

The following site feedback was sent to Joe Mendoza:

EXHIBIT 6 PAGE 43

## Site feedback

Response ID: 32 Data

### 1. Help us improve our website

#### 1. When visiting the website today, what is your role?

Other

#### 2. When visiting the insurance.wa.gov website, what do you typically come to do?

enter continuing education certificates as a provider.

#### 3. How often do you visit the insurance.wa.gov website?

Weekly

#### 4. How can the website better meet your needs?

It freezes when I try to correct field and randomly adds commas to the WAOIC number field and that the field only accepts numbers! I do not type the comma - it appears and duplicates itself in of the site as the logout stops responding, it to exit. Then I have to wait 30 minutes to log back logged in!

If you would like a response to the information you have provided above, please provide your email address:  
preilly61@aol.com

The second issue which is explained is a known issue and Joe has provided the respondent with the guidelines to correct it. The first issue mentioned has not been a reported issue and a determination is needed to find if this is a SIMBA issue or one that is one the user's end.

Thanks,

Jeff Baughman  
Licensing & Education Program Manager  
Office of the Insurance Commissioner  
State of Washington  
(360) 725-7156

EXHIBIT 6 PAGE A4

**Mendoza, Joe (OIC)**

---

**Subject:** FW: SIMBA CE module issue PCHelp\_15691

-----Original Message-----

**From:** Mendoza, Joe (OIC) (OIC) <[JoeM@OIC.WA.GOV](mailto:JoeM@OIC.WA.GOV)>

**To:** preilly61 <[preilly61@aol.com](mailto:preilly61@aol.com)>

**Sent:** Mon, Aug 29, 2011 12:52 pm

**Subject:** FW: SIMBA CE module issue PCHelp\_15691

Pam, our IT staff person (Lisa Whiton) tried to recreate the problems you were having with the roster program. She did not encounter the same problems. She has asked for the course number and completion date you entered so she can try again.

If you would like for our IT staff person to try to identify the roster problem, it is helpful to have all the course information to rule out all possible causes.

The problem could be from several different causes including your keyboard, your computer or your internet connection. She can only test issues with our roster program.

JOE MENDOZA  
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[www.insurance.wa.gov](http://www.insurance.wa.gov)

---

**From:** Whiton, Lisa (OIC)  
**Sent:** Thursday, August 18, 2011 4:45 PM  
**To:** Mendoza, Joe (OIC)  
**Cc:** Baughman, Jeff (OIC); Flaten, Terrie (OIC)  
**Subject:** FW: SIMBA CE module issue PCHelp\_15691

Hi Joe;

I am not able to recreate this issue in SIMBA Intgr. I was able to login and entered a roster for a course.

If you are able to give me his provider number and the course number that he was attempting to enter, I can check to see if it an issue specifically with his information.

Thanks

Lisa

EXHIBIT 6 PAGE 45

**Mendoza, Joe (OIC)**

---

**Subject:** FW: SIMBA CE module issue PCHelp\_15691

---

**From:** [preilly61@aol.com](mailto:preilly61@aol.com) [mailto:preilly61@aol.com]  
**Sent:** Tuesday, September 06, 2011 6:40 PM  
**To:** Mendoza, Joe (OIC)  
**Subject:** Re: SIMBA CE module issue PCHelp\_15691

Joe,

The problem generally occurs when I enter the Long Term Care Initial course (607001). After I enter Scott's WAOIC # 69695, if I then click the licensee lookup button, the field where I entered Scott's number will often create a running loop of 69695,69695,69695..... until I click on it and hit delete. It takes several minutes to delete all of its contents because the stream can be quite long. Also that field does not automatically load his name as the other roster field for the class list does. It hesitates until I click on another field. That might be the key to the problem. The other times it does this are completely random and always associated with the OIC# field or the completion date.

Thanks for looking into this further,  
Pam

EXHIBIT 6 PAGE 46

**Mendoza, Joe (OIC)**

---

**Subject:** FW: SIMBA CE module issue PCHelp\_15691

-----Original Message-----

**From:** Mendoza, Joe (OIC) (OIC) <JoeM@OIC.WA.GOV>  
**To:** mulsgroup <mulsgroup@aol.com>  
**Sent:** Wed, Sep 14, 2011 9:59 am  
**Subject:** FW: SIMBA CE module issue PCHelp\_15691

Pam,

A few more questions below from our IT staff person.

Joe

---

**From:** Whiton, Lisa (OIC)  
**Sent:** Wednesday, September 14, 2011 1:27 PM  
**To:** Mendoza, Joe (OIC)  
**Subject:** RE: SIMBA CE module issue PCHelp\_15691

Hi Joe;  
I have just a few more questions for Pam.

- 1: What browser and version is she using? She can find this by going to Help/About on her browser.
- 2: Is she clicking on the fields? If she is clicking on the fields, if she could try to use her tab button next time and see if it works differently.

If she has a roster that she needs to submit, I would be happy to be available via phone if she runs into similar issues submitting it. But at this point, I still have not been able to replicate this behavior that she is describing ☹.

Thanks

Lisa

EXHIBIT 6 PAGE 47

**Mendoza, Joe (OIC)**

---

**Subject:** FW: SIMBA CE module issue PCHelp\_15691

---

**From:** Whiton, Lisa (OIC)  
**Sent:** Monday, September 19, 2011 8:47 AM  
**To:** 'mulsgroup@aol.com'  
**Cc:** Mendoza, Joe (OIC)  
**Subject:** RE: SIMBA CE module issue PCHelp\_15691

Hi Pam;

Unfortunately we do not support the Google Chrome browser, we support Internet Explorer and Firefox.

If you wouldn't mind, next time you need to submit a roster, please try either IE or Firefox and use the tab key instead of clicking in the fields. That should resolve your issues.

Please let me know if it doesn't.

Thanks

Lisa

---

**From:** [mulsgroup@aol.com](mailto:mulsgroup@aol.com) [<mailto:mulsgroup@aol.com>]  
**Sent:** Wednesday, September 14, 2011 9:20 PM  
**To:** Mendoza, Joe (OIC)  
**Subject:** Re: SIMBA CE module issue PCHelp\_15691

Joe,

I use google chrome.

Yes, I sometimes click on the field because the autofill feature does not always auto fill. If the autofill does not work, the submit button does not work. Also I thought of something else, if I click the add feature in the roster section and then click away to the lookup feature, it often starts to add commas to both the oic# field and the purchase date field.

Yes, I do use the mouse and I am happy to tab instead. Unfortunately, I usually add the rosters some time after 9PM but if I do them in the morning I will call to tell you or just email the pages.

Unlike most people I find these things fascinating and would enjoy getting to the bottom of the glitch!

Thanks, Pam

EXHIBIT 6 PAGE 48

Stickler, Marcia (OIC)

---

**From:** Stickler, Marcia (OIC)  
**Sent:** Thursday, March 22, 2012 10:40 AM  
**To:** 'mulsgroup@aol.com'  
**Subject:** FW: Verified Late Rosters Jan to Oct 2011 Chart  
**Attachments:** JAN FEB 2011 CE SURVEY Final.XLSX; CE SURVEY MAR APR 2011 Final.xls; CE Survey May June 2011 Final.xls; CE Survey July Aug 2011 Final.xls; CE Survey SEPT OCT 2011 Final.xlsx; Chart.xlsx

This is an email from Joe Mendoza that demonstrates and explains the late rosters. Thanks you.

---

**From:** Mendoza, Joe (OIC)  
**Sent:** Tuesday, March 06, 2012 2:46 PM  
**To:** Stickler, Marcia (OIC)  
**Cc:** Baughman, Jeff (OIC)  
**Subject:** Verified Late Rosters Jan to Oct 2011 Chart

---

**Subject:** Verified Late Rosters Jan to Oct 2011 Chart

Marcia, I created a chart on Excel. I also included the results for each survey. Five surveys were conducted from January to October 2011.

#### Chart

On the attached chart, you will notice the three highest violators of the 10 day roster requirement. They have more than 50 verified late rosters for January to October 2011. All other CE providers only accounted for 19 verified late rosters for the same period.

#### Verified Late Roster

A verified late roster signifies a course completion submitted by a producer and the completion date was verified by the CE provider. The CE provider did not submit an on-line roster for the course completion so the course was identified by SIMBA and placed on the Education Aging Report.

#### Correct Date Column

A black date in the correct date column indicates a correct completion date submitted by the producer and is included in the verified late roster totals. The provider could have submitted a roster.

In the **correct date** column, a red date indicates the completion date submitted by the producer was incorrect. Those courses are not included in the verified late roster totals because the provider could not submit a roster.

A blank space in the **correct date** column indicates the course was not surveyed.

JOE MENDOZA  
Program Analyst  
Licensing and Education  
Office of Insurance Commissioner  
(360) 725-7146

EXHIBIT 7 PAGE 1

WAORC # Producer	Course #	Provider	Provider #	Completion Date Reported	Correct date
179343	355069	Intellipass	12012	01/02/2011	1/2/2011
179343	154275		12012	01/02/2011	1/2/2011
179343	154231		12012	01/02/2011	1/2/2011
751491	154231	Intellipass	12012	01/08/2011	1/7/2011
751491	154275		12012	01/08/2011	1/7/2011
751491	355070		12012	01/08/2011	1/3/2011
117291	600980	Intellipass	12012	01/13/2011	
86117	154231	Intellipass	12012	01/17/2011	1/21/2011
86117	154275		12012	01/18/2011	1/21/2011
86117	355070		12012	01/19/2011	1/21/2011
86117	355069		12012	01/20/2011	1/21/2011
104656	604457	Intellipass	12012	01/24/2011	1/24/2011
755807	355070	Intellipass	12012	01/13/2011	1/13/2011
755807	154275		12012	01/13/2011	1/13/2011
755807	154231		12012	01/13/2011	1/13/2011
744574	335951	Intellipass	12012	01/23/2011	1/22/2011
81008	335951	Intellipass	12012	01/24/2011	1/24/2011
716744	355025	Intellipass	12012	01/16/2011	2/16/2011
716744	600980		12012	01/16/2011	2/16/2011
716744	601347		12012	01/16/2011	2/16/2011
716744	604301		12012	01/16/2011	2/16/2011
747472	154231	Intellipass	12012	02/26/2011	2/25/2011
747472	154275		12012	02/26/2011	2/25/2011
747472	355058		12012	02/24/2011	2/25/2011
204189	338482	PRO TRAIN	17248	01/14/2011	
74316	338460	PRO TRAIN	17248	01/28/2011	1/28/2011
74316	604302		17248	01/28/2011	1/28/2011
28876	604301	PRO TRAIN	17248	02/16/2011	2/22/2011
28876	338482		17248	02/17/2011	2/22/2011
28876	338503		17248	02/22/2011	2/22/2011
28876	603719		17248	02/18/2011	2/22/2011
716777	338460	PRO TRAIN	17248	02/22/2011	2/24/2011
716777	603717		17248	02/23/2011	2/24/2011
716777	331892		17248	02/24/2011	2/24/2011
178637	601790	UTICE	18173	01/06/2011	1/5/2011
178637	605260		18173	01/06/2011	1/4/2011
207580	604302	UTICE	18173	02/15/2011	
129007	323499	KENNEDY	19536	01/19/2011	
742774	605410	WALLS	24961	01/03/2011	1/3/2011
742774	603551		24961	01/03/2011	1/3/2011
751585	603549	WALLS	24961	01/12/2011	

706501	603549	WALLS	24961	01/27/2011	1/27/2011
706501	606357		24961	01/27/2011	1/27/2011
706501	604237		24961	01/27/2011	1/27/2011
706501	606269		24961	01/27/2011	1/27/2011
706501	604592		24961	01/27/2011	1/27/2011
163293	256410	WALLS	24961	01/25/2011	
116850	604592	WALLS	24961	02/01/2011	2/1/2011
116850	606357		24961	02/01/2011	2/1/2011
116850	604237		24961	02/01/2011	2/1/2011
116850	606269		24961	02/01/2011	2/1/2011
744610	603552	WALLS	24961	02/01/2011	2/1/2011
744610	603549		24961	01/31/2011	1/31/2011
703222	604237	WALLS	24961	02/01/2011	
258627	604237	WALLS	24961	02/10/2011	Will send
258627	606269		24961	02/11/2011	2/11/2011
258627	606355		24961	02/12/2011	2/12/2011
258627	603552		24961	02/03/2011	2/3/2011
258627	603551		24961	02/10/2011	2/10/2011
258627	603550		24961	02/03/2011	2/3/2011
258627	603549		24961	02/11/2011	2/11/2011
258627	606357		24961	02/14/2011	2/14/2011
747429	604237	WALLS	24961	02/16/2011	2/16/2011
747429	606269		24961	02/16/2011	2/16/2011
747429	604592		24961	02/16/2011	2/16/2011
747429	603551		24961	02/16/2011	2/16/2011
747429	603549		24961	02/16/2011	2/16/2011
747429	605573		24961	02/16/2011	2/16/2011
222480	603549	WALLS	24961	02/13/2011	
70202	606269	WALLS	24961	02/21/2011	2/21/2011
70202	604237		24961	02/21/2011	2/21/2011
70202	606357		24961	02/21/2011	2/21/2011
70202	603549		24961	02/21/2011	2/21/2011
242934	604237	WALLS	24961	02/24/2011	2/24/2011
242934	604592		24961	02/24/2011	2/24/2011
151910	200301	COLL FIN PL	27852	01/31/2011	
29109	606121	INS PRO SKC	28930	02/02/2011	2/2/2011
29109	606646		28930	02/02/2011	2/2/2011
29109	606647		28930	02/02/2011	2/2/2011
29109	606526		28930	02/02/2011	2/2/2011
29109	602055		28930	02/02/2011	2/2/2011
115003	606647	INS PRO SKC	28930	02/02/2011	2/2/2011
115003	606646		28930	02/02/2011	2/2/2011
115003	606121		28930	02/02/2011	2/2/2011
115003	602055		28930	02/02/2011	2/2/2011

115003	306526		28930	02/02/2011	2/2/2011
80757	306526	INS PRO SKC	28930	02/02/2011	2/2/2011
80757	606647		28930	02/02/2011	2/2/2011
80757	606646		28930	02/02/2011	2/2/2011
80757	602055		28930	02/02/2011	2/2/2011
80757	606121		28930	02/02/2011	2/2/2011
742370	604301	WEBCE	29777	02/13/2011	
185917	600135	PAUL DAVIS	300009	02/17/2011	2/17/2011
185917	600132		300009	02/17/2011	2/17/2011
8562	606479	KRUISE SANDI	30755	01/12/2011	
121218	331045	KRUISE SANDI	30755	02/20/2011	
712232	603717	AMI INC	31592	01/23/2011	
119445	328845	FASTRACK	32461	01/17/2011	
752225	280327	360TRAINING	33770	01/01/2011	
751244	314457	360TRAINING	33770	02/03/2011	2/4/2011
751244	280327		33770	02/04/2011	2/4/2011
751244	314480		33770	02/02/2011	2/2/2011
752036	225391	PROSCHOOLS	34386	01/19/2011	
700564	345279	BTH CHAR	35079	01/13/2011	
748274	340521	BTH CHAR	35079	01/21/2011	
217290	266332	KAPLAN	37279	02/12/2011	
155295	600492	AFFORDABLE	37752	02/06/2011	
752165	604301	AFFORDABLE	37752	02/18/2011	
243797	606657	SPOKANE ADJ	6150	02/17/2011	

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153150	605455	12012	03/01/2011	3/2/2011
217135	154275	12012	03/24/2011	3/23/2011
702764	355070	12012	04/05/2011	4/5/2011
702764	355069	12012	04/05/2011	4/5/2011
702764	355058	12012	03/31/2011	3/31/2011
702764	355047	12012	03/31/2011	3/31/2011
212910	600980	12012	04/03/2011	4/3/2011
753325	355070	12012	04/08/2011	4/8/2011
138317	154275	12012	04/14/2011	4/14/2011
746630	355025	12012	04/19/2011	4/21/2011
216356	257994	12012	04/28/2011	4/28/2011
219098	338460	17248	03/05/2011	3/4/2011
219098	603717	17248	03/05/2011	3/4/2011
219098	338482	17248	03/05/2011	3/4/2011
708170	338460	17248	03/07/2011	3/9/2011
708170	603720	17248	03/07/2011	3/9/2011
210148	338460	17248	03/15/2011	3/15/2011
210148	603717	17248	03/15/2011	3/15/2011
210148	338482	17248	03/15/2011	3/15/2011
715779	603717	17248	03/10/2011	3/13/2011
741155	338482	17248	03/19/2011	3/19/2011
741155	338460	17248	03/19/2011	3/19/2011
741155	603720	17248	03/19/2011	3/19/2011
14609	338482	17248	04/06/2011	4/6/2011
717971	331892	17248	04/04/2011	4/4/2011
760265	603717	17248	04/29/2011	4/29/2011
104512	338460	17248	04/15/2011	4/15/2011
104512	338482	17248	04/15/2011	4/15/2011
104512	603717	17248	04/15/2011	4/15/2011
162229	604664	198173	03/14/2011	3/14/2011
190095	601801	198173	03/15/2011	3/15/2011
106604	604664	198173	04/16/2011	4/16/2011
221223	603568	198173	04/20/2011	4/19/2011
213702	289612	19866	03/18/2011	3/21/2011
213702	326744	19866	03/12/2011	3/21/2011
213702	217778	19866	03/05/2011	3/21/2011
713760	605167	19987	03/15/2011	
70202	604592	24961	03/21/2011	03/21/2011
179404	604151	24961	04/05/2011	04/05/2011
160584	603552	24961	03/02/2011	03/02/2011
160584	603549	24961	03/02/2011	03/02/2011
160584	606357	24961	03/02/2011	03/02/2011
160584	606269	24961	03/01/2011	03/01/2011
160584	604237	24961	03/02/2011	03/02/2011
160584	603551	24961	03/03/2011	03/03/2011
160584	604786	24961	03/02/2011	03/02/2011
242207	604237	24961	03/08/2011	03/08/2011
242207	606355	24961	03/08/2011	03/08/2011
242207	606356	24961	03/08/2011	03/08/2011
242207	606269	24961	03/08/2011	03/08/2011
242207	604592	24961	03/08/2011	03/08/2011
242207	606357	24961	03/08/2011	03/08/2011

48230	606355	24961	03/20/2011	03/20/2011
69694	604592	24961	04/12/2011	04/12/2011
136329	604592	24961	03/10/2011	03/10/2011
136329	605410	24961	03/10/2011	03/10/2011
136329	605573	24961	03/10/2011	03/10/2011
725212	604592	24961	04/10/2011	04/10/2011
725212	606357	24961	03/19/2011	03/19/2011
725212	606269	24961	03/13/2011	03/13/2011
725212	604237	24961	03/06/2011	03/06/2011
162525	605410	24961	03/22/2011	03/22/2011
162525	605573	24961	03/22/2011	03/22/2011
162525	604592	24961	03/09/2011	03/09/2011
162525	604301	24961	03/09/2011	03/09/2011
245168	605573	24961	03/15/2011	03/15/2011
245168	605410	24961	03/15/2011	03/15/2011
245168	604592	24961	03/09/2011	03/09/2011
720505	605573	24961	04/30/2011	04/30/2011
190914	606357	24961	04/28/2011	04/28/2011
51052	606439	25773	03/08/2011	
88769	333894	29777	03/21/2011	3/30/2011
717650	604270	29777	04/19/2011	4/20/2011
717650	606461	29777	04/19/2011	4/20/2011
752566	600132	300009	03/03/2011	
97241	604302	30755	04/23/2011	
751499	604301	34386	03/30/2011	
718054	606810	34861	03/24/2011	
138709	286981	35321	04/29/2011	
242809	603468	37279	03/23/2011	3/24/2011
255227	606696	37279	04/18/2011	4/15/2011
255227	251361	37279	04/15/2011	4/18/2011
153295	253945	37279	04/20/2011	4/20/2011
211764	346654	37752	03/05/2011	3/9/2011
723637	346654	37752	03/06/2011	3/4/2011
106172	603712	37752	03/09/2011	3/7/2011
717578	602759	37752	03/17/2011	3/17/2011
247521	606784	4279	03/15/2011	
117526	62260	770	03/31/2011	
747472	154231	12012	02/26/2011	2/25/2011
747472	154275	12012	02/26/2011	2/25/2011
747472	355058	12012	02/24/2011	2/25/2011
716744	355025	12012	01/16/2011	2/16/2011
716744	600980	12012	01/16/2011	2/16/2011
716744	601347	12012	01/16/2011	2/16/2011
716744	604301	12012	01/16/2011	2/16/2011
744574	335951	12012	01/23/2011	1/22/2011

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WAOIC #	Course #	Provider #	Completion Date Reported	Correct date
42990	604879	12012	05/06/2011	05/06/2011
114530	604879	12012	05/06/2011	05/06/2011
253785	154231	12012	05/12/2011	05/12/2011
253785	605455	12012	05/12/2011	05/12/2011
253785	154275	12012	05/12/2011	05/12/2011
750667	604880	12012	05/25/2011	05/25/2011
759962	355036	12012	06/27/2011	06/27/2011
239873	355047	12012	06/27/2011	06/27/2011
182238	604302	12012	05/10/2011	5/9/2011
182238	154231	12012	05/10/2011	5/9/2011
182238	154275	12012	05/10/2011	5/9/2011
182238	605455	12012	05/10/2011	5/9/2011
107046	62729	15721	05/25/2011	
251827	604260	1641	05/25/2011	
97820	249315	17248	05/03/2011	5/3/2011
245508	338493	17248	05/03/2011	5/1/2011
245508	604301	17248	05/03/2011	5/3/2011
240666	338482	17248	05/13/2011	5/14/2011
240666	249360	17248	05/13/2011	5/14/2011
119846	603717	17248	06/20/2011	6/21/2011
119846	338460	17248	06/20/2011	6/21/2011
119846	331892	17248	06/21/2011	6/21/2011
761729	603717	17248	06/23/2011	7/1/2011
761729	338460	17248	06/17/2011	7/1/2011
761729	331892	17248	06/10/2011	7/1/2011
759542	606131	18173	05/27/2011	5/26/2011
155593	604664	18173	06/03/2011	6/2/2011
217109	604664	18173	06/20/2011	6/16/2011
751190	326744	19866	05/14/2011	
750350	602790	21414	05/12/2011	5/13/2011
750350	602794	21414	05/12/2011	Not completed
726738	275862	2365	06/24/2011	
212053	606356	24961	05/19/2011	05/19/2011
212053	604786	24961	05/19/2011	05/19/2011
190914	604592	24961	05/24/2011	05/24/2011
190914	606269	24961	05/10/2011	05/10/2011
190914	604237	24961	05/24/2011	05/24/2011
746102	604237	24961	05/22/2011	05/22/2011
764672	604592	24961	05/25/2011	05/25/2011
764672	606357	24961	05/24/2011	05/24/2011
764672	604237	24961	05/24/2011	05/24/2011
764672	606269	24961	05/24/2011	05/24/2011
764672	603549	24961	05/25/2011	05/25/2011
751797	604592	24961	06/14/2011	06/14/2011
715482	606357	24961	06/15/2011	06/15/2011
715482	604237	24961	06/02/2011	06/02/2011
715482	604592	24961	06/16/2011	06/16/2011
715482	606269	24961	06/14/2011	06/14/2011
715482	603549	24961	06/17/2011	06/17/2011
762147	606269	24961	06/28/2011	06/28/2011
762147	603549	24961	06/27/2011	06/27/2011
181075	604237	24961	06/29/2011	06/29/2011

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712390	606269	24961	06/30/2011	06/30/2011
712390	603551	24961	06/30/2011	06/30/2011
712390	606357	24961	06/30/2011	06/30/2011
721402	604301	24961	06/24/2011	06/24/2011
117051	606664	26367	06/30/2011	
760010	329231	28655	05/09/2011	
135909	252717	29777	05/01/2011	5/5/2011
8649	308407	29777	05/06/2011	5/7/2011
134575	288189	29777	05/20/2011	5/27/2011
208253	249315	31592	05/24/2011	
245263	601937	33770	05/05/2011	5/4/2011
217314	601942	33770	05/12/2011	5/18/2011
217314	314468	33770	05/12/2011	5/18/2011
761859	314479	33770	06/01/2011	6/1/2011
712052	326315	35079	05/26/2011	
7774	172251	35321	05/08/2011	05/08/2011
155227	316932	35321	05/29/2011	5/28/2011
719040	607001	35321	06/02/2011	6/3/2011
215900	606695	3663	05/04/2011	
158989	604466	5193	05/10/2011	

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WAOIC #	Course #	Provider #	Completion Date	Correct Date
760381	335951	12012	07/07/2011	07/07/2011
760381	355025	12012	07/07/2011	07/07/2011
759761	355025	12012	07/07/2011	07/07/2011
759761	600980	12012	07/07/2011	07/07/2011
759761	601347	12012	07/07/2011	07/07/2011
759761	607001	12012	07/07/2011	07/07/2011
162780	355025	12012	07/07/2011	07/07/2011
247793	355036	12012	07/13/2011	07/13/2011
150482	604138	12012	07/13/2011	07/13/2011
150482	355036	12012	07/13/2011	07/13/2011
757052	355036	12012	07/08/2011	07/08/2011
757052	607001	12012	07/11/2011	07/11/2011
760340	154275	12012	07/09/2011	07/09/2011
760340	604138	12012	07/14/2011	07/14/2011
760340	604302	12012	07/16/2011	07/16/2011
753521	355025	12012	07/20/2011	7/18/2011
753521	335951	12012	07/20/2011	7/18/2011
163301	335951	12012	07/23/2011	7/22/2011
159823	355025	12012	07/20/2011	7/22/2011
251154	355069	12012	07/30/2011	07/30/2011
251154	355058	12012	07/29/2011	07/29/2011
78535	355070	12012	08/01/2011	08/01/2011
32962	257994	12012	08/10/2011	08/10/2011
82444	154231	12012	07/27/2011	07/27/2011
167471	604456	12012	08/25/2011	8/26/2011
167471	604457	12012	08/19/2011	8/26/2011
167471	604458	12012	08/16/2011	8/26/2011
167471	607001	12012	08/12/2011	8/26/2011
136776	355025	12012	08/29/2011	08/29/2011
249608	607001	12012	08/31/2011	08/31/2011
138019	605455	12012	08/31/2011	08/31/2011
138019	355025	12012	08/31/2011	08/31/2011
221110	355025	12012	08/31/2011	08/31/2011
221110	605455	12012	08/31/2011	08/31/2011
757638	338460	17248	07/07/2011	7/7/11
757638	338482	17248	07/07/2011	7/7/11
757638	603717	17248	07/07/2011	7/7/11
134350	604302	17248	07/07/2011	7/7/11
184121	604302	17248	07/14/2011	7/14/11
184121	249337	17248	07/14/2011	7/14/11
8886	338460	17248	07/29/2011	8/3/11
8886	603720	17248	07/29/2011	8/3/11
757395	603720	17248	08/04/2011	8/4/11
762939	331892	17248	07/25/2011	7/25/11
84152	249304	17248	08/17/2011	8/17/11
94078	249304	17248	08/16/2011	8/17/11
94078	249294	17248	08/16/2011	8/17/11
94078	249315	17248	08/16/2011	8/17/11
94078	338482	17248	08/17/2011	8/19/11
719817	249294	17248	08/25/2011	8/25/11
134800	331892	17248	08/26/2011	8/28/11
134800	338460	17248	08/26/2011	8/28/11

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134800	603721	17248	08/26/2011	8/28/11
227049	338493	17248	07/21/2011	7/22/11
227049	338460	17248	07/21/2011	7/22/11
186778	604664	18173	07/05/2011	
134448	603562	18173	08/15/2011	
227449	346588	19822	07/01/2011	
759982	62392	19987	08/08/2011	
763803	62417	19987	08/26/2011	
181075	606357	24961	07/08/2011	7/8/2011
156039	604592	24961	07/13/2011	7/13/2011
156039	606357	24961	07/13/2011	7/13/2011
727327	603551	24961	07/23/2011	7/23/2011
720846	606269	24961	07/19/2011	7/19/2011
187754	604592	24961	08/23/2011	8/23/2011
183925	606403	29777	07/05/2011	7/3/2011
215439	305262	29777	08/01/2011	8/8/2011
215439	305295	29777	08/01/2011	8/8/2011
729939	294261	29777	07/26/2011	8/11/2011
729939	602254	29777	07/26/2011	8/11/2011
729939	344300	29777	07/26/2011	8/11/2011
729939	333832	29777	07/26/2011	8/11/2011
729939	336006	29777	07/26/2011	8/11/2011
34438	336633	29777	08/11/2011	8/12/2011
34438	328450	29777	08/11/2011	8/12/2011
161205	305295	29777	08/21/2011	8/22/2011
194914	333883	29777	08/29/2011	8/30/2011
79721	244934	30755	07/19/2011	
227955	606218	35200	07/19/2011	
712876	605433	37279	08/02/2011	
762256	602751	37279	08/21/2011	

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258927	154231	12012	10/06/2011	10/06/2011
224212	154275	12012	10/07/2011	10/17/2011
719668	355025	12012	10/26/2011	10/26/2011
225035	355036	12012	09/03/2011	9/23/2011
751789	355047	12012	09/27/2011	09/27/2011
719668	600980	12012	10/26/2011	10/26/2011
719668	601347	12012	10/26/2011	10/26/2011
3162	604302	12012	10/01/2011	9/28/2011
3162	604879	12012	10/01/2011	9/28/2011
3162	604880	12012	10/01/2011	9/28/2011
3162	604881	12012	10/01/2011	9/28/2011
719668	607001	12012	10/26/2011	10/26/2011
94277	249337	17248	10/28/2011	10/28/2011
763403	249360	17248	09/01/2011	09/01/2011
188048	249360	17248	09/13/2011	09/13/2011
769844	249360	17248	10/12/2011	10/12/2011
702918	249360	17248	10/28/2011	10/28/2011
763403	331892	17248	09/01/2011	09/01/2011
713865	331892	17248	09/07/2011	09/07/2011
247200	331892	17248	09/09/2011	09/09/2011
769844	331892	17248	10/12/2011	10/12/2011
724533	331892	17248	10/07/2011	10/07/2011
753139	331892	17248	10/28/2011	10/28/2011
763403	338460	17248	09/01/2011	09/01/2011
713865	338460	17248	09/07/2011	09/07/2011
252861	338460	17248	09/16/2011	09/16/2011
190904	338460	17248	09/23/2011	09/23/2011
247200	338460	17248	09/09/2011	09/09/2011
769844	338460	17248	10/12/2011	10/12/2011
724533	338460	17248	09/07/2011	09/07/2011
163118	338460	17248	10/18/2011	10/18/2011
230069	338460	17248	10/19/2011	10/19/2011
246819	338460	17248	10/24/2011	10/24/2011
222957	338460	17248	10/21/2011	10/21/2011
702918	338460	17248	10/28/2011	10/28/2011
753139	338460	17248	10/28/2011	10/28/2011
188048	338482	17248	09/13/2011	09/13/2011
252861	338482	17248	09/16/2011	09/16/2011
190904	338482	17248	09/23/2011	09/23/2011
141977	338482	17248	09/23/2011	09/23/2011
167083	338482	17248	10/11/2011	10/11/2011
163118	338482	17248	10/18/2011	10/18/2011

230069	338482	17248	10/19/2011	10/19/2011
246819	338482	17248	10/24/2011	10/24/2011
222957	338482	17248	10/21/2011	10/21/2011
702918	338482	17248	10/28/2011	10/28/2011
94277	338482	17248	10/28/2011	Requested cert
255851	338482	17248	10/31/2011	10/31/2011
94277	338514	17248	10/28/2011	10/28/2011
141977	338525	17248	09/23/2011	09/23/2011
167083	338525	17248	10/11/2011	10/11/2011
255851	338525	17248	10/31/2011	10/31/2011
713865	603717	17248	09/07/2011	09/07/2011
252861	603717	17248	09/16/2011	09/16/2011
190904	603717	17248	09/23/2011	09/23/2011
247200	603717	17248	09/09/2011	09/09/2011
163118	603717	17248	10/18/2011	10/18/2011
230069	603717	17248	10/19/2011	10/19/2011
246819	603717	17248	10/24/2011	10/24/2011
222957	603717	17248	10/21/2011	10/21/2011
141977	603719	17248	09/23/2011	09/23/2011
167083	603719	17248	10/11/2011	10/11/2011
255851	603719	17248	10/31/2011	10/31/2011
724533	603720	17248	09/07/2011	09/07/2011
753139	603720	17248	10/28/2011	10/28/2011
188048	603721	17248	09/13/2011	09/13/2011
188048	604302	17248	09/13/2011	09/13/2011
255851	604302	17248	10/31/2011	10/31/2011
722306	604597	18173	09/28/2011	9/27/2011
188736	604664	18173	09/23/2011	9/22/2011
105759	606828	1944	10/13/2011	
727988	605826	19822	09/01/2011	09/01/2011
263908	289612	19866	10/02/2011	10/3/2011
263908	326744	19866	09/27/2011	10/3/2011
263908	603919	19866	09/30/2011	10/3/2011
263908	604472	19866	09/29/2011	10/3/2011
263908	606207	19866	09/28/2011	10/3/2011
20616	606391	19866	10/11/2011	10/12/2011
717401	603549	24961	09/09/2011	09/09/2011
759922	603549	24961	10/01/2011	10/01/2011
710606	603549	24961	10/24/2011	10/24/2011
759922	603550	24961	10/02/2011	10/02/2011
759922	603552	24961	10/01/2011	10/01/2011
717401	604237	24961	09/09/2011	09/09/2011
759922	604237	24961	10/01/2011	10/01/2011
710606	604237	24961	10/31/2011	10/31/2011

717401	604592	24961	09/09/2011	09/09/2011
717401	606269	24961	09/09/2011	09/09/2011
759922	606269	24961	10/01/2011	10/01/2011
710606	606269	24961	10/26/2011	10/26/2011
759922	606355	24961	10/02/2011	10/02/2011
759922	606356	24961	10/02/2011	10/02/2011
717401	606357	24961	09/09/2011	09/09/2011
759922	606357	24961	10/03/2011	10/03/2011
192453	607001	24961	09/28/2011	09/28/2011
765068	607001	24961	10/07/2011	10/07/2011
217724	604965	25773	10/10/2011	11/5/2011
758357	281418	27588	09/26/2011	09/26/2011
758357	300850	27588	09/26/2011	09/26/2011
758357	318198	27588	09/26/2011	09/26/2011
758357	338141	27588	09/26/2011	09/26/2011
721432	333861	29777	10/27/2011	10/28/2011
721432	344300	29777	10/27/2011	10/28/2011
268242	604496	29777	10/17/2011	10/18/2011
268242	606402	29777	10/17/2011	10/18/2011
721432	606531	29777	10/27/2011	10/28/2011
253911	236489	30755	09/09/2011	09/09/2011
227679	331046	30755	10/12/2011	10/12/2011
73728	604302	30755	10/02/2011	10/02/2011
22049	338284	34386	10/09/2011	10/6/2011
22049	603129	34386	10/09/2011	10/6/2011
22049	606444	34386	10/09/2011	10/8/2011
22049	606447	34386	10/09/2011	10/6/2011
138359	600867	36805	10/26/2011	10/27/2011
252341	239255	37279	10/05/2011	10/4/2011
751782	602349	37752	09/29/2011	9/30/2011
751782	605718	37752	09/30/2011	9/29/2011
86983	607289	6633	09/15/2011	9/16/2011



OFFICE OF  
INSURANCE COMMISSIONER

IN THE MATTER OF

WALLS INSURANCE AND SECURITIES  
SCHOOL  
and  
M. SCOTT REILLY

Respondents.

ORDER NO. 12-0035

CONSENT ORDER  
LEVYING A FINE

The Insurance Commissioner of the State of Washington, pursuant to the authority set forth in RCW 48.05.185, having reviewed the official records and files of the Office of the Insurance Commissioner ("OIC"), makes the following:

**FINDINGS OF FACT:**

1. Walls Insurance and Securities School ("Walls") is an approved insurance education provider, and M. Scott Reilly ("Reilly") is its owner. Reilly has been licensed as a producer of life, disability, and property and casualty insurance since 1989.
2. Insurance education providers are required to maintain a course attendee roster, consisting of sign-in and sign-out registers, for each lecture (classroom) course, and a purchase-and-complete roster for each self-study course. The insurance education provider is required to electronically submit the roster for the course to the OIC within 10 days after completion of each course presentation. The OIC has sent numerous notices and reminders of this requirement to insurance education providers, including Walls and Reilly.
3. During the period of time between January 2011 and October 2011, Walls and Reilly submitted 113 tardy classroom course attendee rosters to the OIC.

**CONCLUSIONS OF LAW:**

1. By submitting late class rosters to the OIC, Reilly and Walls violated WAC 284-17-272(1)(h).
2. WAC 284-17-304 states that the Commissioner may suspend or revoke a continuing insurance education provider's approval if the provider or any of its employees

involved in continuing insurance education is found to have violated any provisions of Titles 48 RCW or 284 WAC.

3. RCW 48.17.560 states that after a hearing or upon stipulation by the licensee or insurance education provider, and in addition to or in lieu of suspension, revocation, or refusal to renew any such license or insurance education provider approval, the Commissioner may levy upon the licensee or insurance education provider a fine of not more than \$1,000 per violation of the insurance code.

**CONSENT TO ORDER:**

Walls and Reilly, acknowledging their duty to comply fully with the applicable laws of the State of Washington, consent to the following in consideration of their desire to resolve this matter without further administrative or judicial proceedings. The Insurance Commissioner consents to settle the matter in consideration of their payment of a fine on such terms and conditions as are set forth below.

1. By agreement of the parties, the Insurance Commissioner will impose a fine of \$8,475 (Eight Thousand Four Hundred Seventy-five Dollars) and suspend \$6,475 (Six Thousand Four Hundred Seventy-five Dollars) of that, on the conditions that:

- a. Within thirty days of the entry of this Order, Walls and Reilly pay \$2,000 (Two Thousand Dollars). Responsibility for compliance with this Order and payment obligations for the fine are joint and several.
- b. Walls and Reilly commit no further violations of the regulation that is the subject of this Order for a period of two years from the date this Order is entered.
- c. Walls and Reilly understand and agree that any future failure to comply with the regulation that is the subject of this Order constitutes grounds for further penalties, which may be imposed in direct response to further violations, in addition to the imposition of the suspended portion of this fine.
- d. The suspended portion of this fine will be imposed at the sole discretion of the Insurance Commissioner according to the conditions as set forth above, without any right to hearing, appeal, or advance notice.

2. Walls and Reilly's failure to timely pay this fine and to adhere to the conditions as set forth above shall constitute grounds for revocation of Wall's approval status as an insurance education provider, and shall result in the recovery of both the suspended and unsuspended amounts

of the fine through a civil action brought on behalf of the Insurance Commissioner by the Attorney General of the State of Washington.

EXECUTED this \_\_\_\_\_ day of \_\_\_\_\_, 2012.

WALLS INSURANCE AND SECURITIES SCHOOL

By: \_\_\_\_\_

Printed Name: \_\_\_\_\_

Corporate Title: \_\_\_\_\_

M. SCOTT REILLY

Signature: \_\_\_\_\_

**ORDER**

Pursuant to the foregoing Findings of Fact, Conclusions of Law, and Consent to Order, the Insurance Commissioner hereby Orders as follows:

1. Walls and Reilly shall pay a fine in the amount of \$8,475, of which amount the sum of \$6,475 is suspended on the condition that Walls and Reilly fully comply with the regulation of the State of Washington that is the subject of this Order for the next two years. Responsibility for compliance with this Order and payment obligations for the fine are joint and several.

2. Walls' and Reilly's failure to pay the unsuspended \$2,000 portion of the fine within the time limit set forth above shall result in the revocation of its approval as an insurance education provider and in the recovery of the fine through a civil action brought on behalf of the Insurance Commissioner by the Attorney General of the State of Washington.

ENTERED AT TUMWATER, WASHINGTON, this \_\_\_\_\_ day of \_\_\_\_\_, 2012.

MIKE KREIDLER  
Insurance Commissioner

By \_\_\_\_\_  
Marcia G. Stickler  
Legal Affairs Division

Licensing & Education Program Manager  
Office of the Insurance Commissioner  
State of Washington  
(360) 725-7156

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**From:** OIC Ask Mike  
**Sent:** Friday, February 10, 2012 11:44 AM  
**To:** Hamje, John (OIC); Baughman, Jeff (OIC)  
**Subject:** FW: Ask Mike - Category: Other

FYI

**Stephanie Marquis**  
Public Affairs  
Washington state Office of the Insurance Commissioner

360.725.7051 | [Stephaniem@oic.wa.gov](mailto:Stephaniem@oic.wa.gov) | [www.insurance.wa.gov](http://www.insurance.wa.gov)

•[wainsurance.blogspot.com](http://wainsurance.blogspot.com) •[Twitter: @WAinsuranceblog](https://twitter.com/WAinsuranceblog) •[Facebook.com/WSOIC](https://www.facebook.com/WSOIC)

*Protecting insurance consumers*

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**From:** [mulsgroup@aol.com](mailto:mulsgroup@aol.com) [<mailto:mulsgroup@aol.com>]  
**Sent:** Thursday, February 09, 2012 9:22 PM  
**To:** OIC Ask Mike  
**Cc:** [mulsgroup@aol.com](mailto:mulsgroup@aol.com)  
**Subject:** Ask Mike - Category: Other

Your Contact Information:

Name:	Scott Reilly
Address:	555 116th Ave NE Suite 125
City:	Bellevue
State:	wa
zip:	98004
Email	<a href="mailto:mulsgroup@aol.com">mulsgroup@aol.com</a>
Phone	4259903366

Category: Other

Your comment or question:

I have been an insurance education provider for over 20 years. I had a great relationship with your office for most of that time. In the last 5 years it has become increasingly hostile, arbitrary and petty. I have trained over 40,000 people in the state of Washington and they are all going to hear about this. I received a letter today fining my company and me \$8,400 this is my first notice, for not reporting in a timely manner. If we had been fined for one violation it would never have been repeated.

How did you hear about us?

Please tell us how you heard of this office and the services provided.

We will try to respond to your comments and questions at the soonest time possible. If you would like immediate assistance, contact the Insurance Consumer Hotline at 1-800-562-6900.

**Please take a moment to tell us what you think of our website by taking a quick survey at:**

<http://www.surveygizmo.com/s/406234/oic-survey>

**Stickler, Marcia (OIC)**

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**From:** mulsgroup@aol.com  
**Sent:** Wednesday, March 07, 2012 9:21 PM  
**To:** Stickler, Marcia (OIC)  
**Subject:** Re: your correspondence of Feb. 8, 2012

We believe we are following the statute per Joe Mendoza's instructions by waiting for his reports on discrepancies between our reports and those of the office of the Insurance Commissioner. One problem we have encountered is If a producer enters an incorrect date, we cannot enter the record because the system will not accept our entry. If we accidentally miss a record, we find out when the discrepancy report is sent to us and we have 10 days to fix the problem.

This system was reiterated to me in an email last week. Frequently, the Commissioner's website has had problems. Specifically producing fields full of commas and repeating data, followed by freezing altogether and locking us out for extended periods of time because it thought we were already logged in. I worked with the IT people on several occasions. After five months they told me that your system did not support Google Chrome (one of the most used internet browsers) the internet browser used by Walls.

In summary, we are being fined for a series of clerical errors and teething problems associated with a new program. Furthermore, the proposed \$8475 fine represents almost 100% of our revenue from Continuing Education for the entire period!

-----Original Message-----

**From:** Stickler, Marcia (OIC) (OIC) <MarciaS@OIC.WA.GOV>  
**To:** mulsgroup <mulsgroup@aol.com>  
**Sent:** Wed, Mar 7, 2012 9:05 am  
**Subject:** RE: your correspondence of Feb. 8, 2012

Mr. Reilly, you must state a reason you want a hearing, per statute. Thanks.

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**From:** [mulsgroup@aol.com](mailto:mulsgroup@aol.com) [<mailto:mulsgroup@aol.com>]  
**Sent:** Tuesday, March 06, 2012 8:05 PM  
**To:** Stickler, Marcia (OIC)  
**Subject:** your correspondence of Feb. 8, 2012

Marcia,

Per my message to you today I would like to request a hearing regarding this matter. Consider this email my written request to your order 12-0035 of February 8. If you have any questions please do not hesitate to contact me.

Scott Reilly  
Walls Training