

HURLEY & LARA
Attorneys at Law

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July 12, 2012

Honorable M. DIC
Patricia D. Petersen
Chief Hearing Officer

Ms. Kelly A. Cairns
Office of Insurance Commissioner
Hearings Unit
P.O. Box 40255
Olympia, WA 98504-0255

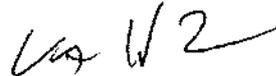
Re: Justina Y. Espinoza
Docket No. 12-0072

Dear Ms. Cairns:

At this morning's conference, Judge Petersen requested I file the enclosed Affidavit of Abel Mendez.

Please call me if you have any questions or comments.

Sincerely,



VICTOR H. LARA

VHL:gk
Enclosure

cc: Andrea Philhower (w/ enc.)

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Heidi S. Hill, D.C.
Patricia D. Peterson
Chief Hearing Officer

BEFORE THE STATE OF WASHINGTON
OFFICE OF INSURANCE COMMISSIONER

In the Matter of) Docket No. 12-0072
JUSTINA Y. ESPINOZA,)
Respondent.) AFFIDAVIT OF
) ABEL MENDEZ
)
)

STATE OF WASHINGTON)
 : ss.
County of Yakima)

ABEL MENDEZ, being first duly sworn on oath, deposes and says:

1. I make this Affidavit in support of Justina Espinoza's request to reconsider the denial of her letter of written consent to engage in the business of insurance.

2. I own Mendez Insurance Agency, which is located at 2804 Main Street, Suite 5, Union Gap, Washington 98903. I have worked for Farmers Insurance Group since 2004. Currently, I am a life and financial services agent. My insurance business offers *auto, home, life and business insurance*.

3. Justina Y. Espinoza has been employed by Mendez Insurance Agency as an Agency Support Assistant since July 2006. Her duties are (*please see attached job description*).

4. I am aware that Ms. Espinoza was convicted of forgery and identity theft in Yakima County Superior Court. While these are very serious charges, I believe that



they do not affect Ms. Espinoza's fitness to perform her duties. I previously prepared a letter for Ms. Espinoza, a copy of which I attach to this Affidavit. The letter explains the reason I believe that the above-referenced convictions will not affect Ms. Espinoza's ability to perform her duties in my insurance agency in an honest and forthright manner.

5. In addition, my insurance agency has safeguards in place to ensure that all employees are performing their work in an honest and professional manner such as our daily transactions are recorded daily and reviewed daily for any discrepancies by Farmer's ACA department.

6. For these reasons, I believe that Ms. Espinoza will not be in a position that will constitute a risk or threat to insurance consumers or the insurer.

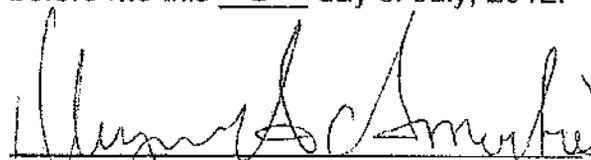
7. If you have any questions, I can be reached at:

Mendez Insurance Agency
2804 Main Street, Suite 5
Union Gap, WA 98903
Business: (509)453-4140
Cell: (509)833-1475

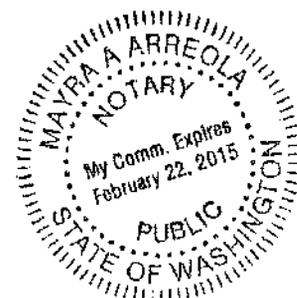


ABEL MENDEZ

SUBSCRIBED AND SWORN TO before me this 5 day of July, 2012.



NOTARY PUBLIC in and for the State of
Washington, residing at Yakima
My Commission expires: 02/22/12

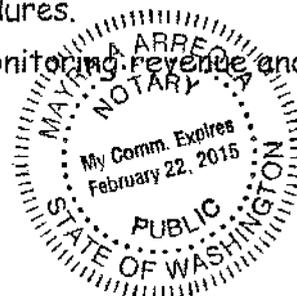




FARMERS

Justina Y. Espinoza's Job Description.

1. Helps the agent with the day-to-day operations of the agency and helps implements programs to meet long term and short-term goals for agency growth.
2. Maintains personnel files: payroll, vacation and sick leave.
3. Helps the agent implement all agency policies and procedures.
4. Assists the agent/owner in establishing a budget and monitoring revenue and expenses.
5. Tracks production and servicing of each department.





Abel Mendez
Life and Financial Services Agent
Mendez Insurance Agency
2804 Main Street, Suite 5
Union Gap, WA 98903
Bus: 509-453-4140
Fax: 509-453-4510

Re: Justina Y. Espinoza

To Whom It May Concern,

My name is Abel Mendez I am an Agent that is appointed with Farmers Insurance Group. I have been an agent since August of 2004.

I personally interviewed and hired Justina Y. Espinoza as an Agency Support Assistant for Mendez Insurance Agency, of Farmers Insurance Group in July 2006. She came to me not having any experience in the insurance industry however I saw something in her that made me feel that this young lady had something special to offer and I was not going to be the one to miss or close the door on someone that could be an asset to my customers and or my business.

Since her date of hire Justina has become a trusted and most valuable employee that I trust emphatically. Justina has become everything that I could have ever hoped for and more. My agency does not function well without Justina. I can't speak enough about her tireless work ethic and her high standards to conduct herself in the most professional and ethical manner in the work place as well as her personal life. Justina dedicates herself to her work, church, community and especially her family. I am very proud to see her become the person that she is today and that I know she has always been.

Justina has out grown her position here at Mendez Insurance Agency. She is seeking professional growth in the insurance industry and nothing would mean more to me than licensing Justina in Property and Casualty along with Life and Disability in the State of Washington. This would not only be good for the Agency but also for the community as well as my clients and future clients that would benefit greatly by having a licensed professional to turn to for questions and insurance needs. Justina is a perfect example on how someone can take a negative start in life and turn it into something positive. Justina is a role model in our community and I humbly ask you grant her the opportunity to continue to grow as a person and as a professional.

Respectfully,


Abel Mendez
Agent