

Received  
*Filed*  
FEB 24 2015  
Insurance Commissioner

BEFORE THE STATE OF WASHINGTON  
OFFICE OF THE INSURANCE COMMISSIONER

In the Matter of

KARLA PADILLA REYNA

Licensee.

Docket No. 14-0196

OIC RESPONSE TO LICENSEE'S  
REQUEST TO RESCIND  
REVOCATION

COMES NOW the Washington State Office of the Insurance Commissioner ("OIC"), by and through Darryl E. Colman, staff attorney, Insurance Enforcement Specialist, and submits its Response to Ms. Padilla-Reyna ("Licensee")'s Request to Rescind Revocation, along with the accompanying Declaration of Renee Molnes and Exhibits thereto. This Response is also based on the other filings and pleadings in this action. The Presiding Officer should deny Licensee's request for a stay, as the Order Revoking License in this matter was sent to the address and email address that Licensee most recently provided to the OIC. Furthermore, the conduct of Licensee as set forth in the Order Revoking License represents a clear threat to consumers.

A. No Automatic Stay

Licensee's Request to Rescind Revocation appears to be most fairly considered a request for a stay pending hearing, although it does not use that precise terminology. RCW 48.04.020(1) provides for a stay of agency action when a "demand for a hearing [is] received by the commissioner prior to the effective date of action taken or proposed to be taken by him." Here, the Order Revoking License, No. 14-0196, was mailed to Licensee's address of record on October 13, 2014, with an effective date of October 31, 2014. Licensee's demand for hearing was received by the OIC's Hearings Unit on January 2, 2015, long after the effective date of the Order Revoking License. The Presiding Officer correctly ruled that no automatic stay was in effect.



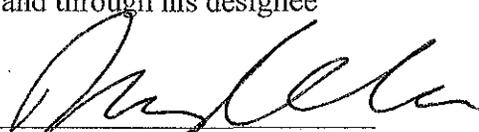
1 the person's residence, mailing, business or e-mail address.” *Id.* “Failure to advise the  
2 commissioner of a change of address may subject a licensee to disciplinary action under RCW  
3 48.17.530 and 48.17.560.” *Id.* The Licensee never updated her mailing or email address with  
4 the OIC after March 2014. (Declaration of Renee Molnes, page 2, para. 4-5.) The Order  
5 Revoking License, mailed in October 2014, went to the mailing address that Licensee herself  
6 selected only a few months before in March 2014. (*Id.*; Order Revoking License, No. 14-  
7 0196, page 7). Even if the Licensee no longer does business at that address, her own failure to  
8 update her mailing address, as required by the OIC’s regulations, should not justify any kind  
9 of stay of the Order Revoking License. WAC 284-17-005(2). This is especially true given  
10 that the Licensee’s conduct, as set forth in the Order Revoking License, represents a clear  
11 threat to consumers. Therefore, the OIC respectfully requests that the Presiding Officer deny  
12 any stay of the Order Revoking License.

13 RESPECTFULLY SUBMITTED this 24th day of February, 2015.

14 

15 MIKE KREIDLER  
Insurance Commissioner

16 By and through his designee

17 

18 Darryl E. Colman  
19 Insurance Enforcement Specialist  
20 Legal Affairs Division

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Insurance Commissioner

BEFORE THE STATE OF WASHINGTON  
OFFICE OF THE INSURANCE COMMISSIONER

In the Matter of

KARLA PADILLA REYNA

Licensee.

Docket No. 14-0196

DECLARATION OF RENEE  
MOLNES RE: LICENSEE'S  
REQUEST TO RESCIND  
REVOCATION

I, RENEE MOLNES, under penalty of perjury under the laws of the State of Washington, declare that the following facts are personally known to me, and, if called upon to do so, I could and would testify competently to them.

1. The Office of the Insurance Commissioner ("OIC") stores records about licensees in an electronic database. This includes licensee's contact information, such as mailing address and email address. This contact information is received from licensees in the regular course of business, and is truly and accurately recorded in the electronic database at or near the time the information is received from the licensee.

2. According to the OIC's electronic database, Ms. Padilla-Reyna's most recent contact information is as follows:

Mailing address:

Karla Padilla-Reyna  
815 N 1<sup>st</sup>  
Yakima, WA 98901

Email:

kpr@insproagencies.com

It is the licensee's responsibility to keep this contact information up to date.

3. Furthermore, the OIC's electronic database keeps a record of documents received from licensees, such as all license renewal applications. License renewal

DECLARATION OF RENEE MOLNES  
RE: LICENSEE'S REQUEST TO  
RESCIND REVOCATION  
ORDER NO. 14-0196

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Office of the Insurance Commissioner  
P O Box 40255  
Olympia WA 98504-0255

1058566

1 applications are received from licensees by the OIC in the regular course of business, and are  
2 truly and accurately recorded in the electronic database at or near the time the application is  
3 received from the licensee.

4 4. Attached as Exhibit A hereto is a true and accurate copy of Ms. Padilla-Reyna's  
5 most recent license renewal application summary. The application was filed March 18, 2014.  
6 Ms. Padilla-Reyna was required to certify that all the information contained in the application  
7 was true and complete. Ms. Padilla-Reyna's March 18, 2014, license renewal application  
8 summary lists her contact information as follows:

9 Mailing address:

10 815 N 1st  
11 Yakima, WA 98901

12 kpr@insproagencies.com

13 5. Ms. Padilla-Reyna also identified her residence address, but did not list it as an  
14 alternative mailing address. Ms. Padilla-Reyna never updated her mailing address or email  
15 with the OIC since March 18, 2014.

16 I DECLARE UNDER PENALTY OF PERJURY UNDER THE LAWS OF WASHINGTON  
17 STATE THAT THE FOREGOING IS TRUE AND CORRECT.

18 Dated this 24th day of February, 2015.

19   
20 \_\_\_\_\_  
21 RENE E MOLNES



## APPLICATION SUMMARY

- No.      Attestation**
1.      I hereby certify that, under penalty of perjury, all of the information submitted in this application and attachments is true and complete. I am aware that submitting false information or omitting pertinent or material information in connection with this application is grounds for license revocation or denial of the license and may subject me to civil or criminal penalties.
  2.      Unless provided otherwise by law or regulation of the jurisdiction, I hereby designate the Insurance Commissioner to be my agent for service of process regarding all insurance matters in the respective jurisdiction and agree that service upon the Insurance Commissioner is of the same legal force and validity as personal service upon myself.
  3.      I further certify that I grant permission to the Insurance Commissioner to verify information with any federal, state or local government agency, current or former employer, or insurance company.
  4.      I further certify that, under penalty of perjury, a) I have no child support obligation, b) I have a child support obligation and I am currently in compliance with that obligation, or c) I have identified my child support obligation arrearage on this application.
  5.      I authorize the jurisdictions to which this application is made to give any information concerning me, as permitted by law, to any federal, state or municipal agency, or any other organization and I release the jurisdictions and any person acting on their behalf from any and all liability of whatever nature by reason of furnishing such information.
  6.      I acknowledge that I understand and comply with the insurance laws and regulations of the jurisdictions to which I am applying for licensure.
  7.      For Non-Resident License Applications, I certify that I am licensed and in good standing in my home state/resident state for the lines of authority requested from Washington State.
  8.      I hereby certify that upon request, I will furnish the jurisdiction(s) to which I am applying, certified copies of any documents attached to this application or requested by the jurisdiction(s).

Fee Description	Fee (in USD)
License Fee(Insurance Producer)	\$55.00
<b>Total Fee</b>	<b>\$55.00</b>

1 CERTIFICATE OF MAILING

2 The undersigned certifies under the penalty of perjury under the laws of the state of  
3 Washington that I am now and at all times herein mentioned, a citizen of the United States, a  
4 resident of the state of Washington, over the age of eighteen years, not a party to or interested  
5 in the above-entitled action, and competent to be a witness herein.  
6

7 On the date given below I caused to be served the following documents:

- 8 1. OIC RESPONSE TO LICENSEE'S REQUEST TO RESCIND REVOCATION, and  
9  
10 2. DECLARATION OF RENEE MOLNES RE: LICENSEE'S REQUEST TO RESCIND  
11 REVOCATION,

12 on the following individuals at their respective addresses, as indicated below:

13 **Via Hand Delivery:**

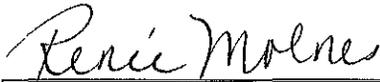
14 Hon. George Finkle, Chief Hearing Officer  
15 P O Box 40255  
16 Olympia, WA 98504-0255

17 **Via electronic mail:**

18 Karla Padilla Reyna  
19 815 North 1<sup>st</sup>  
20 Yakima, WA 98901  
21 [kpr@insproagencies.com](mailto:kpr@insproagencies.com)

Karla Padilla Reyna  
10050 Mieras Road  
Yakima, WA 98901  
[excelsior4944@gmail.com](mailto:excelsior4944@gmail.com)

22 DATED this 24th day of February, 2015, at Tumwater, Washington.

23   
24 Renee Molnes  
25 Paralegal  
26