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**FILED**

2016 FEB 24 A 8:20

HEARINGS UNIT  
OFFICE OF  
INSURANCE COMMISSIONER

BEFORE THE STATE OF WASHINGTON  
OFFICE OF THE INSURANCE COMMISSIONER

*In the Matter of*  
  
FIRST AMERICAN TITLE INSURANCE  
COMPANY,  
  
Authorized Title Insurer.

ORDER NO. 15-0166  
  
WAOIC No. 461  
NAIC No. 50814

**DECLARATION OF JERRY  
KINDINGER IN OPPOSITION TO  
OIC MOTION TO QUASH  
DEPOSITION**

I, Jerry Kindinger, declare as follows:

1. I am an attorney with Ryan, Swanson & Cleveland, PLLC, attorneys for First American Title Insurance Company. I am competent to testify and make the following statements based upon my personal first-hand knowledge and belief. If called to testify would repeat and affirm each and every statement herein made.

2. Attached hereto as Exhibit A is a true and correct copy of OIC's Answers and Responses to First Interrogatories and Requests for Production of First American Title Insurance Company.

3. On February 23, 2016 I took the deposition of Barry Walden. Mr. Walden was the investigator for Legal Affairs who was asked to investigate this matter. Mr. Walden testified about the nature and extent of his investigation. He indicated that he prepared a final investigative report. This report substantially relied upon a complaint filed by Chris Schulz, an employee of a competitor of First American and a telephone interview of Mr. Schulz by Mr.

DECLARATION OF JERRY KINDINGER IN  
OPPOSITION TO OIC MOTION TO QUASH  
DEPOSITION - 1

1 Walden. Several months after the filing of his investigative report, Mr. Walden learned that  
2 Mr. Schulz had lied in his complaint and during his telephone interview. As a result of  
3 Mr. Walden's final investigative report, Deputy Commissioner AnnaLisa Gellermann  
4 apparently directed a Consent Order to be prepared and presented to First American based upon  
5 the incorrect information that Mr. Walden had received.

6 4. First American investigated the allegations contained in the "Consent Order,"  
7 found them to be false and inaccurate and provided the OIC with sworn third-party declarations  
8 establishing its position. First American then requested an opportunity to meet with the  
9 Department to discuss a constructive method of proceeding to address the Department's  
10 concerns. Attached as Exhibit B is a true and accurate copy of one of the emailed requests sent.

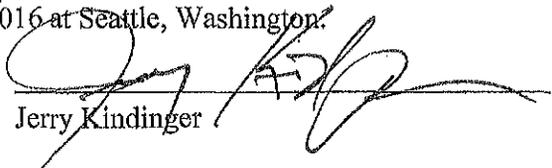
11 5. When the misstatements from Mr. Schulz surfaced, Ms. Gellermann apparently  
12 directed the existing Notice of Hearing to be filed after revising the allegations made in the  
13 Consent Order. However, Mr. Walden also testified that he is unaware of any evidence to  
14 support allegations contained in several paragraphs of the present Notice of Request for  
15 Hearing.

16 6. Attached hereto as Exhibit C is a true and correct copy of the December 30,  
17 2015 email sent to Marcia Stickler.

18 7. First American set Ms. Gellermann's deposition only after first contacting her  
19 representative, Marcia Stickler, and allowing Ms. Gellermann and Ms. Stickler to select the  
20 date and time convenient and available for both of them. We also agreed to limit her deposition  
21 to not more than one-half day.

22 I declare under penalty of perjury under the laws of the State of Washington and the  
23 laws of the United States that the foregoing is true and correct.

24 DATED this 24<sup>th</sup> day of February, 2016 at Seattle, Washington.

25   
26 Jerry Kindinger

DECLARATION OF JERRY KINDINGER IN  
OPPOSITION TO OIC MOTION TO QUASH  
DEPOSITION - 2

1266982.01



Ryan, Swanson & Cleveland, PLLC  
1201 Third Avenue, Suite 3400  
Seattle, WA 98101-3034  
206.464.4224 | Fax 206.583.0359

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**DECLARATION OF SERVICE**

I hereby declare as follows:

1. I am a citizen of the United States and a resident of the State of Washington. I am over the age of 18 years and not a party to the within action. I am employed by the law firm of Ryan, Swanson & Cleveland, PLLC, 1201 Third Avenue, Suite 3400, Seattle, Washington, 98101-3034.

2. On the 24<sup>th</sup> day of February, 2016, I caused to be served the foregoing document upon the individuals listed below, at the address and in the manner described:

Mr. William Pardee, Presiding Officer  
Washington State Insurance Commissioner  
PO Box 40255  
Olympia, WA 98504-0255

- U.S. Mail
- Hand Delivery
- E-mail (dorothys@oic.wa.gov)
- Facsimile

Ms. Marcia G. Stickler  
Insurance Enforcement Specialist  
Office of the Insurance Commissioner  
Legal Affairs Division  
PO Box 40255  
Olympia, WA 98504-0255

- U.S. Mail
- Hand Delivery
- E-mail (marcias@oic.wa.gov)
- Facsimile

I declare under penalty of perjury under the laws of the state of Washington that the foregoing is true and correct.

DATED this 24<sup>th</sup> day of February, 2016 at Seattle, Washington.

  
\_\_\_\_\_  
Susan Smith



**EXHIBIT A**

1  
2 **BEFORE THE STATE OF WASHINGTON**  
3 **OFFICE OF THE INSURANCE COMMISSIONER**

4 *In the Matter of*

5 **FIRST AMERICAN TITLE**  
6 **INSURANCE COMPANY,**

7 **Authorized Title Insurer.**

Docket No. 15-0166

WA OIC# 461

NAIC NO. 50814

OIC'S ANSWERS AND RESPONSES TO  
FIRST INTERROGATORIES AND  
REQUESTS FOR PRODUCTION OF  
DOCUMENTS OF FIRST AMERICAN  
TITLE INSURANCE COMPANY

11 **INTERROGATORIES AND REQUESTS FOR PRODUCTION**

12  
13 **INTERROGATORY NO. 1:** Identify each person who participated in or  
provided information used in answering these discovery requests.

14 **ANSWER:** Marcia Stickler and Renee Molnes.

15  
16 **INTERROGATORY NO. 2:** Identify each and every person employed by or on  
behalf of the OIC who participated in any aspect of the OIC investigation or  
17 decision to assess a fine against First American and briefly describe the role of  
each such person.

18 **ANSWER:** Barry Walden, OIC Investigator. Mr. Walden investigated the  
19 complaint against First American; Mark Durphy, Investigations Manager. Mr.  
20 Durphy reviewed Mr. Walden's investigation and referred the matter for  
enforcement; and Marcia Sticker, Insurance Enforcement Specialist, prepared  
21 the memo for the Compliance Committee and presented the matter there. She  
22 drafted the request for hearing and spoke briefly with complainant Chris  
Schulz.

23 **INTERROGATORY NO. 3:** Identify what person or persons at the OIC made  
the decision to assess a \$100,000 fine against First American.

24  
25 **ANSWER:** Marta DeLeon, AnnaLisa Gellermann, John Hamje, Molly Nollette,  
26 Jason Siems, Steve Valandra, and Jim Odiorne,

1 **INTERROGATORY NO. 4:** Describe in detail how the OIC determined the  
2 amount of the fine for the alleged WAC violations contained in the Notice of  
Hearing and in connection therewith:

- 3 a. Identify every person who participated in this determination;  
4 b. The dates of their participation; and  
5 c. The methodology, if any, by which the amount of the fine was determined.

6 **ANSWER:** a) Marta DeLeon, AnnaLisa Gellermann, John Hamje, Molly Nollette,  
7 Jason Siems, Steve Valandra, and Jim Odiome; b) June 30, 2015; c) Consistency  
8 with other enforcement actions; Impact of violations — on consumers, on  
9 marketplace, etc. — frequency, severity, extent of violations — extent to which a  
10 violator gained a competitive advantage through the violation(s); Prior conduct of  
11 company; Statutory maximums/minimums; Whether violations were  
12 intentional/grossly negligent/negligent, etc.; Whether the enforcement action  
13 contemplated is likely to be viewed by respected elements of the industry, when all  
14 facts are known, as reasonable; Financial stability of the company; Policy  
15 implications; Company's cooperation with regulators — for example, did company  
16 bring problem to regulator's attention; what is company's commitment to  
17 compliance and what demonstrated steps has it taken toward achieving compliance;  
18 did company tell regulators the truth about a situation during the investigative phase  
19 or at the time of the occurrence; Cost to agency of investigation and enforcement  
20 action

21 **INTERROGATORY NO. 5:** State each and every fact upon which you base  
22 your allegation that First American entered into an "agreement, arrangement,  
23 scheme...designed to avoid RCW 48.29.210 and WAC 284-29-200, and in  
24 connection therewith identify:

- 25 a. Every person having knowledge of such facts; and  
26 b. All documents that you contend supports this allegation.

**ANSWER:** The Commissioner objects to this interrogatory on the basis that it  
requests information that requires the Commissioner to render a legal conclusion,

1 constitutes an impermissible invasion of the opinions, mental impressions and  
2 theories of counsel, and requires the Commissioner to put on a dress rehearsal for  
3 the hearing. See *Webb v. Biddle*, 72 Wn.2d 22, 431 P.2d 705 (1967). The  
4 Commissioner also objects to this interrogatory on the basis that the request for the  
5 Commissioner to "state each and every fact" is ambiguous, vague, unreasonably  
6 broad and unduly burdensome. See e.g., *Steil v. Humana Kansas City, Inc.*, 197  
7 F.R.D. 445 (D. Kan. 2000); *Safeco of America v. Rawston*, 181 F.R.D. 441, 447 (C.  
8 D.Cal. 1998); *Lawrence v. First Kansas Bank & Trust Co.*, 169 F.R.D. 657, 663  
9 (D. Kan. 1996).

10 **REQUEST FOR PRODUCTION NO. 1:** Produce all documents in any way  
11 related to the subject matter of the Interrogatory immediately above.

12 **RESPONSE:** Undated Jim Tompkins email – Exhibit 1D to OIC investigative  
13 file previously provided.

14 **INTERROGATORY NO. 6:** State each and every fact upon which you base  
15 your allegation in paragraph A2 of the Notice of Hearing that "First American  
16 would take care of all planning and execution of the event but it would be  
17 technically a 'trade association event' under WAC 284-29-220."

18 **ANSWER:** The Commissioner objects to this interrogatory on the basis that it  
19 requests information that requires the Commissioner to render a legal conclusion,  
20 constitutes an impermissible invasion of the opinions, mental impressions and  
21 theories of counsel, and requires the Commissioner to put on a dress rehearsal for  
22 the hearing. See *Webb v. Biddle*, 72 Wn.2d 22, 431 P.2d 705 (1967). The  
23 Commissioner also objects to this interrogatory on the basis that the request for the  
24 Commissioner to "state each and every fact" is ambiguous, vague, unreasonably  
25 broad and unduly burdensome. See e.g., *Steil v. Humana Kansas City, Inc.*, 197  
26 F.R.D. 445 (D. Kan. 2000); *Safeco of America v. Rawston*, 181 F.R.D. 441, 447  
(C.D. Cal. 1998); *Lawrence v. First Kansas Bank & Trust Co.*, 169 F.R.D. 657, 663  
(D. Kan. 1996).

**INTERROGATORY NO. 7:** Identify every person having information in  
support of the allegations quoted in the Interrogatory immediately above.

**ANSWER:** Matthew Wahlquist, Ryan McIrvin, Ruth Hopkins, Sara Christensen,  
Chris Schulz, Earl Schmidt, and Barry Walden.

1 **REQUEST FOR PRODUCTION NO. 2:** Produce all documents and records  
2 in any way related to the allegations contained in the Interrogatory next above.

3 **RESPONSE:** Included in OIC Discovery produced on July 28, 2015.

4  
5 **INTERROGATORY NO. 8:** In connection with the allegations in paragraph  
6 B3 in the Notice of Request for Hearing, identify each and every affiliate  
7 member you contend was excluded from the subject event.

8 **ANSWER:** All affiliate members of SSCAR that were competitors with FATIC.  
9 The Commissioner does not contend that some affiliate members of SSCAR would  
10 have been "excluded," had they shown up at the event, but that individual  
11 invitations were not sent to them if they were a competitor with FATIC, including  
12 Old Republic Title in Everett. The attendee list does not indicate that any  
13 competitors of FATIC attended.

14  
15 **REQUEST FOR PRODUCTION NO. 3:** Produce all documents which you  
16 contend supports the allegation referenced in the Interrogatory next above.

17 **RESPONSE:** Included in OIC Discovery produced on July 28, 2015.

18 **INTERROGATORY NO. 9:** Identify the specific statutory authority or  
19 regulation which you claim authorizes the OIC to assess \$100,000 fine in  
20 connection with this proceeding.

21 **ANSWER:** RCW 48.29.210 prohibits the giving of anything of value to a producer  
22 of title insurance business except as permitted under rules adopted by the  
23 Commissioner. The OIC alleges that FATIC gave 270 producers of title insurance  
24 business an educational seminar not in keeping with the rules in WAC 284-29. As  
25 such, FATIC is subject to RCW 48.05.140 and RCW 48.05.185. A sanction is  
26 permitted under RCW 48.05.140 if the insurer "fails to comply with *any* provision  
of this code." RCW 48.05.185 allows a fine of between \$250 and \$10,000 for such  
failure, in lieu of or in addition to other sanctions. Since a single occurrence of a  
rule violation justifies suspension or revocation, and the ability to suspend or revoke  
justifies a \$250-\$10,000 fine, each occurrence of a violation justifies an individual  
fine of \$250 to \$10,000. This interpretation is entitled to deference as the OIC

1 administers the statutes involved. *Bailey v. Allstate*, 73 Wn. App, 442, 447 (1994);  
2 also *Port of Seattle v. Pollution Control Board*, 151 Wn.2d 568, 612 (2004).

3 FATIC is not subject to double jeopardy. The scope of the violation, as  
4 defined by the Legislature is considered a unit of prosecution. Although FATIC is  
5 alleged to have given just one unauthorized educational seminar, each attendee  
6 receiving the free class was given a thing of value not in keeping with the  
7 regulations. The unit of prosecution then, is each producer of title insurance that  
8 wrongly was given the seminar. *State v. Reeder*, No. 90577-1, December 17, 2015.  
9 Thus, the maximum fine could have been \$2,700,000.

10 **INTERROGATORY NO. 10:** Identify all fines assessed by the OIC since 2008  
11 for alleged violations of WAC 284-29-200 through WAC 284-29-265, and as to  
12 each list:

- 13 a. The proceeding or cause number;
- 14 b. The date the fine was assessed; and
- 15 c. The amount of the fine.

16 **ANSWER:** Inasmuch as administrative orders do not have precedential value and  
17 are decided on a case-by-case basis, the Commissioner objects to this interrogatory  
18 as irrelevant and not reasonably calculated to lead to the discovery of admissible  
19 evidence. The Commissioner also objects because Respondent seeks  
20 information that is as available to Respondent as to the Commissioner on the OIC  
21 website. See *Snohomish County Public Transportation Benefit Area v. The Public  
22 Employment Relations Commission et al*, 173 Wn. App. 504 (2013)

23 **INTERROGATORY NO. 11:** Identify all fines assessed by the OIC since  
24 2008 for alleged violations of RCW 48.29.210 and list:

- 25 d. The proceeding or cause number;
- 26 e. The date the fine was assessed; and
- f. The amount of the fine.

**ANSWER:** Inasmuch as administrative orders do not have precedential value and  
are decided on a case-by-case basis, the Commissioner objects to this interrogatory  
as irrelevant and not reasonably calculated to lead to the discovery of admissible

1 evidence. The Commissioner also objects because Respondent seeks information  
2 that is as available to Respondent as to the Commissioner on the OIC website. See  
3 *Snohomish County Public Transportation Benefit Area v. The Public Employment  
Relations Commission et al*, 173 Wn. App. 504 (2013)

4 **INTERROGATORY NO. 12:** Identify each and every person whom you believe  
5 to have any information pertaining to the allegations contained in the notice of  
6 hearing in this matter and as to each identify for which allegation or allegations  
you believe they have knowledge.

7 **ANSWER:** The Commissioner objects to this interrogatory on the basis that it  
8 is vague, ambiguous, calls for speculation and improperly asks the  
9 Commissioner to testify to the personal knowledge of other individuals.  
10 Without waiving such said objection, the Commissioner's response is: Ruth  
11 Hopkins, Chris Shulz, Jim Tompkins, Barry Walden, Jim Fetzer, Ryan McIrvin,  
Matthew Wahlquist, Earl Schmidt, and Sara Christensen. See OIC Investigation  
Report previously provided.

12 **INTERROGATORY NO. 13:** Identify all persons which the OIC may call as  
13 witnesses at the hearing in this matter.

14 **ANSWER:** Ruth Hopkins, Chris Shulz, Jim Tompkins, Barry Walden, Jim  
15 Fetzer, Ryan McIrvin, Matthew Wahlquist, Sara Christensen, and Earl Schmidt.

16 **REQUEST FOR PRODUCTION NO. 4:** Please produce all correspondence or  
17 written communications of any kind including without limitation email to and  
18 from and/or between anyone at the OIC in any way related to the subject matter  
of this proceeding.

19 **RESPONSE:** Included in OIC discovery materials produced on July 28, 2015.

20 **REQUEST FOR PRODUCTION NO. 5:** Produce all notes, memorandum,  
21 correspondence and emails or other communications or records of any kind  
22 between anyone on behalf of OIC and anyone on behalf of First American, in  
any way related to the subject matter of this proceeding.

23 **RESPONSE:** Included in OIC Discovery produced on July 28, 2015.

24 **REQUEST FOR PRODUCTION NO. 6:** Produce any time records made or  
25 maintained by any OIC employee in any way showing time expended in any  
26

1 way related to the subject matter of this proceeding and which shows time spent  
2 by each such employee and the dates and description of what work was done  
and when.

3 **RESPONSE:** The Commissioner objects to this interrogatory because it seeks  
4 information that is not relevant and is not reasonably calculated to lead to the  
5 discovery of admissible evidence. Without waiving such objection, the  
6 Commissioner responds that he does keep employee time records that show  
hours worked each day. The time record does not indicate subject matter  
worked on. The Commissioner has no such records concerning this matter.

7  
8 **REQUEST FOR PRODUCTION NO. 7:** Produce all written communications of  
any form made by any OIC employee within the last five (5) years relating to  
9 interpretation of WAC 284-29-200 through WAC 284-29-265.

10 **RESPONSE:** The OIC website has a section devoted to Frequently Asked  
11 Questions about the title insurance inducement regulations. See  
www.insurance.wa.gov/for-producers/title-insurance/inducement-rules.  
12

13 **REQUEST FOR PRODUCTION NO. 8:** Produce all information published  
by the OIC within the last five (5) years pertaining to interpretation of WAC  
14 284-29-200 through WAC 284-29-265.

15 **RESPONSE:** The OIC website has a section devoted to Frequently Asked  
16 Questions about the inducement regulations. See www.insurance.wa.gov/for-  
producers/title-insurance/inducement-rules.  
17

18 **REQUEST FOR PRODUCTION NO. 9:** Produce all information published  
by the OIC within the last five (5) years pertaining to interpretation of RCW  
19 48.29.210.

20 **RESPONSE:** There are no OIC publications of which we are aware that have  
21 interpreted RCW 48.29.210 within the last five years.

22 **REQUEST FOR PRODUCTION NO. 10:** Produce all orders issued by  
23 the OIC since 2008 assessing fines for violations of RCW 48.29.210

24  
25 **RESPONSE:** Inasmuch as administrative orders do not have precedential value  
and are decided on a case-by-case basis, the Commissioner objects to this  
26 interrogatory as irrelevant and not reasonably calculated to lead to the discovery

1 of admissible evidence. The Commissioner also objects because Respondent  
2 seeks information that is as available to Respondent as to the Commissioner on the  
OIC website.

3 **REQUEST FOR PRODUCTION NO. 11:** Produce all orders issued by the OIC  
4 since 2008 assessing any fines for violations of WAC 284-29-200 through WAC  
5 284-29-265.

6 **RESPONSE:** Inasmuch as administrative orders do not have precedential value  
7 and are decided on a case-by-case basis, the Commissioner objects to this  
8 interrogatory as irrelevant and not reasonably calculated to lead to the discovery  
9 of admissible evidence. The Commissioner also objects because Respondent  
10 seeks information that is as available to Respondent as to the Commissioner on the  
11 OIC website.

12 **REQUEST FOR PRODUCTION NO. 12:** Produce any other writings, records,  
13 notes and communications in any way related to the subject matter of these  
14 proceedings not previously produced in response to the requests above.

15 **RESPONSE:** Additional material is attached.

16 ANSWERS AND RESPONSES DATED this 20<sup>th</sup> day of January, 2016.

17   
18 MIKE KREIDLER  
19 Insurance Commissioner

20 By and through his designee  
21   
22 MARCIA G. STICKLER  
23 Insurance Enforcement Specialist  
24 Legal Affairs Division  
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STATE OF WASHINGTON )  
 ) ss.  
COUNTY OF THURSTON )

Marcia G. Stickler, being first duly sworn, on oath deposes and says: That she is the designated representative of the Office of the Insurance Commissioner herein, has made the foregoing Answers to Interrogatories and Requests for Production, knows the contents thereof and believes same to be true and complete.

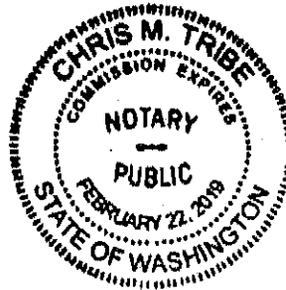
Marcia G. Stickler

SUBSCRIBED AND SWORN to before me this 20<sup>th</sup> day of January, 2016.

Chris M. Tribe  
(Print Name)

NOTARY PUBLIC in and for the State of Washington

My Appointment Expires February 22, 2019



**EXHIBIT B**

## Kindinger, Jerry

---

**From:** Kindinger, Jerry  
**Sent:** Wednesday, September 09, 2015 5:06 PM  
**To:** 'Mr. Charles D. Brown'  
**Subject:** FW: First American Title Ins.--Order No. 15-0166  
**Attachments:** 201509041527.pdf; 201509041524.pdf  
  
**Categories:** DM, #1169258 : 015245 : 00039

Chuck,

Thanks for your call this afternoon. Below is the email I sent Marcia last Friday. Above are the declarations which I attached. I appreciate your taking a look at this. Best regards.

Jerry

### **Jerry Kindinger**

*Member*

Ryan, Swanson & Cleveland, PLLC  
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[Biography](#) | [vCard](#)



Ryan, Swanson & Cleveland, PLLC

---

**From:** Kindinger, Jerry  
**Sent:** Friday, September 04, 2015 4:30 PM  
**To:** 'Stickler, Marcia (OIC)'  
**Subject:** First American Title Ins.--Order No. 15-0166

Marcia,

Attached are declarations of Matthew Wahlquist and Ryan Mc Irvin from Snohomish County Camano Association of Realtors. These declarations seem to materially contradict several statements made in the Department's settlement offer contained in the unsigned Consent Order Levying a Fine against First American Title Insurance Company. Once you have had an opportunity to review these declarations we would like to discuss with you the most constructive way to jointly work toward a mutually acceptable resolution of this matter. Please advise when we might do that. Thanks and best regards.

Jerry

### **Jerry Kindinger**

*Member*

Ryan, Swanson & Cleveland, PLLC  
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[kindinger@ryanlaw.com](mailto:kindinger@ryanlaw.com) | [www.ryanlaw.com](http://www.ryanlaw.com) | [www.ryanlaw.com](http://www.ryanlaw.com)



**EXHIBIT C**

## Kindinger, Jerry

---

**From:** Kindinger, Jerry  
**Sent:** Wednesday, December 30, 2015 10:51 AM  
**To:** Stickler, Marcia (OIC)  
**Subject:** First American ads. OIC--No. 15-0166  
**Attachments:** first interrogatories\_001.pdf

**Categories:** DM, #1240823 : 015245 : 00039

Marcia,

Per our telephone conference today, attached please find First American Title Insurance Company's First Interrogatories and Requests for Production.

We understand that service by email is acceptable and that service upon you by email will suffice for valid service upon the Commissioner.

I want to share one of our material purposes in promulgating these discovery requests. We want to know what specific evidence the Department has to support each of its allegations in the Notice of Hearing and who has testimonial knowledge to support those allegations. For that reason, while I acknowledge that approximately six months ago you provided a "file" of documents which was thought to contain whatever documents you had then, we nonetheless would like to the Department to produce documents on a request by request basis identifying which requests the documents are intended to respond to. As you can appreciate a cursory response to requests of "previously provided" does not allow us to understand which documents intend to rely upon in support of its many allegations. This is particularly important inasmuch as the Department has now changed some of its allegations after our client voluntarily sent you information showing the OIC's original claims set out in the Consent Order proffered as a settlement offer were substantively wrong. We believe most of the other allegations in the present Notice of Hearing are similarly flawed. Your identification of documents by request will allow us and the Judge to evaluate the evidence related to these allegations.

Thanks and best regards for the New Year.

Jerry

**Jerry Kindinger**

*Member*

Ryan, Swanson & Cleveland, PLLC  
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[kindinger@ryanlaw.com](mailto:kindinger@ryanlaw.com) | [www.ryanswansonlaw.com](http://www.ryanswansonlaw.com)  
[Biography](#) | [vCard](#)



**From:** [library@ryanlaw.com](mailto:library@ryanlaw.com) [<mailto:library@ryanlaw.com>]  
**Sent:** Wednesday, December 30, 2015 9:47 AM  
**To:** Kindinger, Jerry  
**Subject:** Attached Image