

2019 MAR -5 P 4: 311

RECEIVED MAK 05 2019 OIC - LEGAL AFFAIRS

HEARINGS UNIT

STATE OF WASHINGTON OFFICE OF THE INSURANCE COMMISSIONER

In the Matter of:

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Order No. 18-0496

JEFF D. GRAHAM,

Licensee,

WAOIC No. 234591 7095831

DEMAND FOR HEARING

NPN

TO:

Daniel Jacobs, Insurance Enforcement Specialist

Office of the Insurance Commissioner

P.O. Box 40255

Olympia, WA 98504

State of Washington

Via Certified Mail

YOU ARE HEREBY NOTIFIED that Jeff D. Graham, Licensee, demands a hearing regarding the Order Revoking License dated December 19, 2018.

Jeff Graham's license has been unlawfully revoked. Peter Kram, attorney for licensee, requested that Mr. Wes Diaz, OIC Senior Investigator, provide the policies and documents in question and in their possession. The Office of Insurance Commissioner conducted an interview with the licensee but refused to provide any documents to which the investigator and department referred during the interview. Mr. Graham repeated the

DEMAND FOR HEARING Graham.1.24.19, Demand. Hearing

KRAM & WOOSTER, P.S. 1901 South I Street, Tacoma WA 98405 (253) 272-7929; Fax (253) 572-4167

| | documents requests several times during the interview. Mr. Graham was denied due process |
|------------|---|
| 2 | in this interview process because it was impossible for Mr. Graham to answer questions |
| , . | about the company's administrative policies as well as specific policies issued by the |
| , | company at the requests of the insureds. Mr. Graham's treatment was discriminatory in that |
| · | it treated the company representatives and the Department differently than Mr. Graham. Mr. |
| 5 | Graham has explained in writing that he did not violate any statutes with respect to |
| 7. | insurance policies issued by MetLife. Mr. Graham was not afforded the opportunity to |
| 3 | review alleged company documents, procedures and policies prior to or during the interview. |
|) | This hearing shall be scheduled through Peter Kram, 1901 South I Street, Tacoma, |
| 10 | WA 98405, 253 272-7929. |
| 11 · | Dated this 28 day of February, 2019. |
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| 13 | RAK |
| 14 | Peter Kram, WSBA 7436 Attorney for Licensee, Jeff Graham |
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