



Recusal Memorandum

To: Legal Division, Office of the Insurance Commissioner; ASA Assurance, Inc.

From: Commissioner Kreidler

Date: September 11, 2019

Subject: In the Matter of (company/individual): ASA Assurance, Inc.

SIMBA Number: 1597637

Case No. 19-0453

I, Mike Kreidler, Insurance Commissioner of the State of Washington, do hereby recuse myself from participation in any administrative hearing regarding the above matter. I will not confer in any manner with Presiding Officer Julia Eisentrout at any stage in the administrative proceeding, regarding any final decision or summary judgment decision, or otherwise. I, along with all other OIC employees involved in the investigation, charging, and/or prosecution in this matter, will be screened from Presiding Officer Eisentrout and Hearings Unit paralegal Rebekah Carter.

As is always the case, the Presiding Officer and the Hearings Unit paralegal will maintain a separate record that cannot be accessed by the originating division, the Legal Affairs division and other screened employees. All steps shall be taken to ensure that I, and all other screened persons at the OIC, will not have access to the OIC Hearings Unit file and/or the Presiding Officer's file, notes, or any confidential communications within the Hearings Unit regarding this matter.

Under the authority granted to the Insurance Commissioner in RCW 48.02.100, I do hereby delegate to Julia Eisentrout complete authority to serve as Presiding Officer for any potential administrative proceeding related to the above matter, brought to my office pursuant to RCW chapter 48.04, 34.05, and/or other applicable statutes. Julia Eisentrout has sole responsibility for the conduct of this hearing, the procedural matters related thereto, and for the preservation of hearing records. Without any consultation with myself, Julia Eisentrout will render a final order or other appropriate order concluding proceedings in this matter.

Signed this 11 day of September, 2019

Mike Kreidler, Insurance Commissioner