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1/27/2017

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HEARINGS UNIT
OFFICE OF
INSURANCE COMMISSIONER

Emily Hawkins
eswang2@gmail.com
206-669-6902

To whom it may concern,

I would like to formally request a hearing to discuss the matter of Emily Wang Hawkins Insurance Agency and Emily Shunan Hawkins Order number 16-0263.

I severely disagree with the accusations put forth from previous employees of Emily Hawkins insurance agency when it pertains to the matters below.

I'm directly harmed by this decision because I believe this is an aggressively disgruntled employee who was rejected unemployment insurance and who blackmailed me to increase her pay when my team was small. When I denied her this, she wrote to me about how she would not do her work, and how she would walk off the job (this is all documented).

Here are the things that I disagree with.

1) "Hawkins directed a team member to forge client signatures on documents"

My direction was to get the correct signature and to get it taken care of. Whether that meant the team members having to drive out there to take care of it.

I never directed a team member to forge a client's signature. We always told the client what we were selling to them and they always signed the documents. If a team member forged a signature it was not on my direction.

2) "Hawkins admitted to inappropriately increasing the sale of insurance products by bundling Auto policies, with Life, Hospital Indemnity or Renters policies without appropriate explanation of cost, coverage, and benefits".

We ALWAYS presented all of the COST, COVERAGE and BENEFITS. I trained everyone to talk about why it was important and to get beneficiary information. In addition, there were State Farm Corporate led trainings that talked about bundling policies repeatedly. This was from Sales Leader and State Farm training and direction. Team Member also remembers going to an Auto training class in Dupont, WA and being taught how to bundle.

3) "56 Washington customers purchased Life Insurance policies requiring an oral swab, but instead Hawkins submitted her own oral swab".

A blatant lie. This never happened.

4) "Consumers were never asked questions in a Hospital Indemnity policy nor were the policies ever fully explained to the consumers".

All employees were to collect W4LSLK, this info tells us about whether the clients are disabled/working. With the conversations I had with the client was a part of the application process. It helped me to get the answers to the HI policy.

5) "Hawkins required insured to come into the agency in order to cancel policies.

Blatant lie again. We would try to convince them to stay but we cancelled policies all the time without clients stepping into our office.

6) "Hawkins used storage of and access by unapproved vendors of non-public information using ABS account in violation of the consumers' information security".

What does this constitute? State Farm does not provide a list of approved or not approved. They were well aware we were using DYL. I learned to use DYL from other agents.

7) "The team member said they would put together a packet of forms that include auto, life, renters, and hospital indemnity and just flip through the forms and ask people to sign them".

This is only after we explained coverages, cost, and benefits. Also, the majority of our clients electronically signed everything. We rarely did paper applications.

Sincerely,

Emily Hawkins

STATE OF WASHINGTON
OFFICE OF THE INSURANCE COMMISSIONER

In The Matter of

EMILY SHUNAN HAWKINS,

and

**EMILY WANG HAWKINS
INSURANCE AGENCY,**

Licensees.

ORDER NO. 16-0263

WAOIC NO. 808848
NPN 16490855

WAOIC NO. 817419
FEIN No. 46-0924853

ORDER REVOKING LICENSES

To: Emily Wang
417 29th Ave E.
Seattle, WA 98112
eswang2@gmail.com

Emily Wang Hawkins Insurance Agency
4227 E. Madison St. #2B
Seattle, WA 98112-4231
emily.hawkins.twuo@statefarm.com

IT IS ORDERED AND YOU ARE HEREBY NOTIFIED that your Washington State insurance producer licenses are **REVOKED**, effective **November 20, 2016**, pursuant to RCW 48.17.530.

BASIS:

1. Emily Shunan Hawkins ("Hawkins" or "the Licensee") was a resident producer licensed by the OIC on May 15, 2012, WAOIC # 808848. Hawkins' producer license expired on September 6, 2015 and she has no active appointments or affiliations. Hawkins' appointment as a licensed representative of State Farm was *terminated for cause* on February 13, 2015.

ORDER REVOKING LICENSES
ORDER NO. 16-0263

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State of Washington
Office of the Insurance Commissioner
PO Box 40255
Olympia, WA 98504-0255

2. Emily Wang Hawkins Insurance Agency ("the Agency") is a resident producer (WAOIC # 817419) licensed by the OIC on September 20, 2012. The Agency's producer license is due to expire on September 20, 2016 and the Agency has no active appointments or affiliations. Hawkins is the owner and Designated Responsible Licensed Person ("DRLP") for the Emily Wang Hawkins Insurance Agency ("the Agency"). As the DRLP, Hawkins is responsible for the business entity's compliance with the insurance laws and rules of this state and her actions as the DRLP impact the licensure of the Agency.

3. The OIC received complaints from two (2) former employees/producers of Hawkins and the Hawkins Agency as well as a notification from State Farm regarding Hawkins' termination and its Investigative Report.

4. The investigations conducted by State Farm and the OIC revealed numerous violations of Washington's insurance laws and regulations committed by Hawkins. These violations include:

- a) Hawkins admitted that she directed and approved the unlicensed sale of Life and Health policies by two (2) of her unlicensed team members and compensated them for these sales.
- b) Hawkins directed a team member to forge client signatures on documents. When a team member obtained a consumer's signature on a paper application, Hawkins directed the employee to apply the signature to the electronic application, which the Team Member did at the direction of Hawkins. This was a forgery because the client did not sign the application that was submitted by the agency.
- c) Hawkins admitted to taking mandatory compliance training for another person and directed her team members to take and certify training for a team member who had no longer worked at the agency. Hawkins did this in order to maintain the former team member's alias that was used for unlicensed sales activity.
- d) Hawkins admitted to inappropriately increasing the sale of insurance products by bundling Auto policies with Life, Hospital Indemnity, or Renters policies, without the appropriate explanation of costs, coverage and benefits. In an interview with a former

Hawkins team member, the team member stated that Hawkins trained her employees to bundle policies making it appear that all the coverage was associated with the Auto policy. The team member said they would put together a packet of forms that included the Auto policy application with the signature page from the Life, Hospital Indemnity, or Renters policy and just flip through the forms and ask people to sign them.

- e) Hawkins conducted fraudulent Life policy activity by swabbing her own cheek and submitted it as that of the consumer for the Oral Specimen Test submissions. Fifty-six (56) Washington consumers purchased Life Insurance requiring an oral swab, but instead Hawkins submitted her own oral swabs.
- f) Hawkins failed to deliver Life insurance policies to policyholders and instructed team members to discard the delivery instructions and instead file the policies in a cabinet. A large number of Life policies remained in the office which were dated back more than a year. There were estimated there to be over one hundred (100) of these policies in and around the filing cabinet. In addition to not receiving their Life policies, policyholders were not informed of the 30-day free look period provided for in their policies.
- g) Hawkins used storage of and access by unapproved vendors of non-public information such as bank account information, credit card numbers, and social security numbers through her Agent Business System (ABS) account in violation of the consumers' information security.
- h) Hawkins sent Hospital Indemnity policy application signature pages to clients for their signatures with pre-populated "no" responses to all eight questions. Consumers were never asked these questions on the policy application nor were the policies ever fully explained to the consumers.
- i) Hawkins required insureds to come into the agency in order to cancel policies.

5. Hawkins was terminated for cause when State Farm discovered, and Hawkins admitted to, using unauthorized systems not sanctioned by State Farm, logging in from another person's account, failing to deliver life insurance policies, storing confidential information, using

text messages, selling products as bundles without clearly explaining to consumers what they are purchasing, having clients sign blank documents, and taking State Farm training for another person.

6. During her interview with OIC, Hawkins admitted to sharing of credentials for purposes of training practice and storing private and confidential information on an unsecured database but she denied the other allegations.

7. The OIC then requested an additional interview following the gathering of evidence. However, refused to provide a statement and stated she is no longer in the insurance business.

8. RCW 48.17.530(1)(b) allows the Insurance Commissioner to place on probation, suspend, revoke, or refuse to issue or renew an adjuster's license, an insurance producer's license, a title insurance agent's license, or any surplus line broker's license for violating any insurance laws, or violating any rule, subpoena, or order of the Insurance Commissioner or of another state's insurance commissioner. By directing and approving the unlicensed sale of Life and Health policies by unlicensed team members and compensating them for the sales, directing a team member to forge client signatures on documents, taking mandatory compliance training for another person and directing her team members to take and certify training for another team member who had no longer worked at the agency, inappropriately increasing the sale of insurance products by bundling Auto policies with Life Health, or Renters policies, without the appropriate explanation of costs, coverage and benefits, conducting fraudulent Life policy activity by swabbing her own cheek and submitting it as that of the consumer, failing to deliver Life insurance policies to policyholders, using storage of and access by unapproved vendors of non-public information, sending Hospital Indemnity policy application signature pages to clients with pre-populated "no" responses to all eight questions and failing to ask consumers the questions on the policy application or fully explaining the policies to the consumers, and requiring insureds to come in to the agency in order to cancel policies, the Licensees violated RCW 48.17.530, justifying the revocation of her license and the license of the Agency.

9. RCW 48.17.530(1)(d) allows the Insurance Commissioner to place on probation,

suspend, revoke, or refuse to issue or renew an adjuster's license, an insurance producer's license, a title insurance agent's license, or any surplus line broker's license for improperly withholding, misappropriating, or converting any moneys or properties received in the course of doing insurance business. By failing to deliver Life insurance policies to policyholders, the Licensee violated RCW 48.17.530(1)(d), justifying the revocation of her license and the license of the Agency.

10. RCW 48.17.530(1)(e) allows the Insurance Commissioner to place on probation, suspend, revoke, or refuse to issue or renew an adjuster's license, an insurance producer's license, a title insurance agent's license, or any surplus line broker's license for intentionally misrepresenting the terms of an actual or proposed insurance contract or application for insurance. By directing a team member to forge client signatures on documents, inappropriately increasing the sale of insurance products by bundling Auto policies with Life Health, or Renters policies, without the appropriate explanation of coverage and benefits, conducting fraudulent Life policy activity by swabbing her own cheek and submitting it as that of the consumer, sending Hospital Indemnity policy application signature pages to clients with pre-populated "no" responses to all eight questions and failing to ask consumers the questions on the policy application or fully explaining the policies to the consumers, the Licensee violated RCW 48.17.530(1)(e), justifying the revocation of her license and the license of the Agency.

11. RCW 48.17.530(1)(g) allows the Insurance Commissioner to place on probation, suspend, revoke, or refuse to issue or renew an adjuster's license, an insurance producer's license, a title insurance agent's license, or any surplus line broker's license for having admitted or been found to have committed any insurance unfair trade practice or fraud. By directing a team member to forge client signatures on documents, taking mandatory compliance training for another person and directing her team members to take and certify training for a team member who had no longer worked at the agency, inappropriately increasing the sale of insurance products by bundling Auto policies with Life Health, or Renters policies, without the appropriate explanation of coverage and benefits, conducting fraudulent Life policy activity by swabbing her own cheek and submitting it as that of the consumer, failing to deliver life insurance policies to policyholders, using storage of and access by unapproved vendors of non-public information, sending Hospital Indemnity policy

application signature pages to clients with pre-populated "no" responses to all eight questions and failing to ask consumers the questions on the policy application or fully explaining the policies to the consumers, and requiring insureds to come in to the agency in order to cancel policies, the Licensee violated RCW 48.17.530(1)(g), justifying the revocation of her license and the license of the Agency.

12. RCW 48.17.530(1)(h) allows the Insurance Commissioner to place on probation, suspend, revoke, or refuse to issue or renew an adjuster's license, an insurance producer's license, a title insurance agent's license, or any surplus line broker's license for using fraudulent, coercive, or dishonest practices, or demonstrating incompetence, untrustworthiness, or financial irresponsibility in this state or elsewhere. By directing and approving the unlicensed sale of Life and Health policies by unlicensed team members and compensating them for the sales, directing a team member to forge client signatures on documents, taking mandatory compliance training for another person and directing her team members to take and certify training for a team another member who had no longer worked at the agency, inappropriately increasing the sale of insurance products by bundling Auto policies with Life Health, or Renters policies, without the appropriate explanation of coverage and benefits, conducting fraudulent Life policy activity by swabbing her own cheek and submitting it as that of the consumer, failing to deliver Life insurance policies to policyholders, using storage of and access by unapproved vendors of non-public information, sending Hospital Indemnity policy application signature pages to clients with pre-populated "no" responses to all eight questions and failing to ask consumers the questions on the policy application or fully explaining the policies to the consumers, and requiring insureds to come in to the agency in order to cancel policies, the Licensee violated RCW 48.17.530(1)(h), justifying the revocation of her license and the license of the Agency.

13. RCW 48.17.530(1)(j) allows the Insurance Commissioner to place on probation, suspend, revoke, or refuse to issue or renew an adjuster's license, an insurance producer's license, a title insurance agent's license, or any surplus line broker's license for forging another's name to an application for insurance or to any document related to an insurance transaction. By directing a team member to forge client signatures on documents, taking mandatory compliance training for

another person and directing her team members to take and certify training for a team member who had no longer worked at the agency, conducting fraudulent Life policy activity by swabbing her own cheek and submitting it as that of the consumer, and sending Hospital Indemnity policy application signature pages to clients with pre-populated "no" responses to all eight questions and failing to ask consumers the questions on the policy application or fully explaining the policies to the consumers, the Licensee violated RCW 48.17.530(1)(j), justifying the revocation of her license and the license of the Agency.

14. RCW 48.30.210 states a person who knowingly makes a false or misleading statement or impersonation, or who willfully fails to reveal a material fact, in or relative to an application for insurance to an insurer, is guilty of a gross misdemeanor, and the license of any such person may be revoked. By taking mandatory compliance training for another person and directing her team members to take and certify training for a team member who had no longer worked at the agency, inappropriately increasing the sale of insurance products by bundling Auto policies with Life Health, or Renters policies, without the appropriate explanation of coverage and benefits, conducting fraudulent Life policy activity by swabbing her own cheek and submitting it as that of the consumer, failing to deliver life insurance policies to policyholders, sending Hospital Indemnity policy application signature pages to clients with pre-populated "no" responses to all eight questions and failing to ask consumers the questions on the policy application or fully explaining the policies to the consumers, and requiring insureds to come in to the agency in order to cancel policies, the Licensees violated RCW 48.30.210.

15. RCW 48.17.457 states that every insurance producer, title insurance agent, adjuster, or other person licensed under this chapter shall promptly reply in writing to an inquiry of the commissioner relative to the business of insurance. A timely response is one that is received by the commissioner within fifteen business days from receipt of the inquiry. Failure to make a timely response constitutes a violation of this section. By refusing to respond to an inquiry of the Insurance Commissioner, the Licensees violated RCW 48.17.475.

16. Hawkins, who is the DRLP for the Agency, is responsible for each of these violations under RCW 48.17.090(3)(b).

17. RCW 48.17.530 authorizes the Commissioner to place on probation, suspend, revoke, or refuse to issue or renew an insurance producer's license or may levy a civil penalty in accordance with RCW 48.17.560 or any combination of actions.

IT IS FURTHER ORDERED that you return your insurance producer's license certificates to the Insurance Commissioner on or before the effective date of the revocation of your licenses, as required by RCW 48.17.530(4). Return your license to:

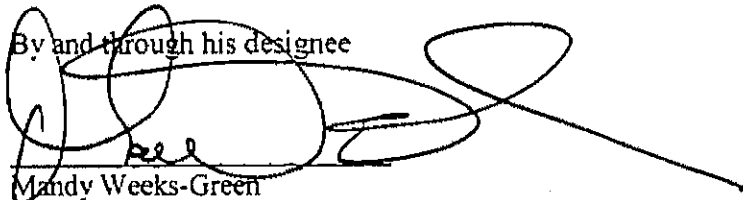
Licensing Manager
Office of the Insurance Commissioner
P. O. Box 40255
Olympia, WA 98504-0255

ENTERED at Tumwater, Washington, this 2nd day of November, 2016.



MIKE KREIDLER
Insurance Commissioner

By and through his designee



Mandy Weeks-Green
Insurance Enforcement Specialist
Legal Affairs Division

NOTICE OF YOUR RIGHT TO A HEARING

If you are aggrieved by this Order Revoking License, you may demand a hearing in accordance with RCW 48.04.010, WAC 284-02-070 and WAC 10-08-110. Generally a hearing demand must be in writing and received within 90 days after the date of this Order Revoking License, which is the day it was mailed to you, or you will waive your right to a hearing.

If the Insurance Commissioner receives your demand for a hearing before the effective date listed on the order revoking your license, the revocation will be automatically stayed (postponed) and your license will remain in effect pending the hearing.

Your demand for a hearing should be sent to the following address and must briefly state how you are harmed by this decision and why you disagree with it:

Hearings Unit
Office of the Insurance Commissioner
PO Box 40255
Olympia, WA 98504-0255

You will be notified of the time and place of your hearing. If you have questions about filing a demand for hearing or the hearing process, please telephone the Hearings Unit at (360) 725-7002 or send an email to Hearings@oic.wa.gov.

CERTIFICATE OF MAILING

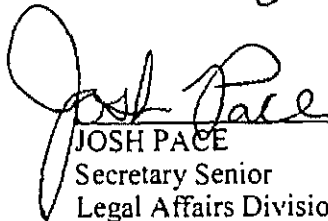
The undersigned certifies under the penalty of perjury under the laws of the state of Washington that I am now and at all times herein mentioned, a citizen of the United States, a resident of the state of Washington, over the age of eighteen years, not a party to or interested in the above-entitled action,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

On the date given below I caused to be served the foregoing Order Revoking Licenses on the following individual by email and by depositing in the U.S. mail via state Consolidated Mail Service with proper postage affixed:

Emily Wang
417 29th Ave E.
Seattle, WA 98112
eswang2@gmail.com

Emily Wang Hawkins Insurance Agency
4227 E. Madison St. #2B
Seattle, WA 98112-4231
emily.hawkins.twuo@statefarm.com

Dated this 2nd day of November, 2016, in Tumwater, Washington.



JOSH PACE
Secretary Senior
Legal Affairs Division