

JAN 09 2020

DEPT OF INSURANCE
BY HS 01/09/2020

STATE OF ARIZONA
DEPARTMENT OF INSURANCE

In the Matter of:

**WILLIAMS, KOREASA MARIA
FKA KOREASA WRIGHT**
(National Producer Number 8430816)

No. 19A-048-INS

ORDER

and

**GLAM INSURANCE SERVICES, LLC
DBA WILLIAMS AND ASSOCIATES**
(National Producer Number 17893137)

Respondent.

On January 6, 2020, the Office of Administrative Hearings, through Administrative Law Judge Kay A. Abramsohn issued an Administrative Law Judge Decision ("Recommended Decision"), received by the Director of the Arizona Department of Insurance ("Director") on January 7, 2020, a copy of which is attached and incorporated by this reference. The Director has reviewed the Recommended Decision and enters the following Order:

1. The Director adopts the Recommended Findings of Fact, Conclusions of Law and Recommended Order.
2. The Director orders that Koreasa Maria Williams' insurance producer license number 8430816 is revoked, effective immediately.
3. The Director orders that Glam Insurance Services, LLC's insurance producer license number 17893137 is revoked, effective immediately.

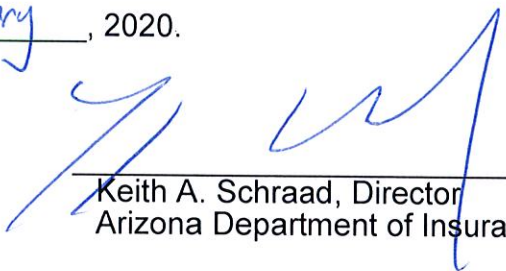
NOTIFICATION OF RIGHTS

Pursuant to Arizona Revised Statutes ("A.R.S.") § 41-1092.09, Respondent may request a rehearing with respect to this order by filing a written motion with the Director of the Department of Insurance within 30 days of the date of this Order, setting forth the basis

1 for relief under A.A.C. R20-6-114(B). Pursuant to A.R.S. § 41-1092.09, it is not necessary
2 to request a rehearing before filing an appeal to Superior Court.

3 Respondent may appeal the final decision of the Director to the Superior Court of
4 Maricopa County for judicial review pursuant to A.R.S. § 20-166. A party filing an appeal
5 must notify the Office of Administrative Hearings of the appeal within ten days after filing
6 the complaint commencing the appeal, pursuant to A.R.S. § 12-904(B).

7 DATED this 8th day of January, 2020.

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11 _____
12 Keith A. Schraad, Director
13 Arizona Department of Insurance

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COPY of the foregoing electronically transmitted
this this 10th day of January, 2020, to:

Kay A. Abramsohn, Administrative Law Judge
Office of Administrative Hearings
<https://portal.azoah.com/submission>

COPY of the foregoing mailed same date
by U.S. First-Class Mail and Certified Mail,
Return Receipt requested, to:

Bruce R. Heurlin, Esq.
Heurlin Sherlock PC
7320 N. La Cholla Blvd, Suite 154 #535
Tucson, AZ 85742
Attorney for Respondents

1 **COPY** of the foregoing delivered, same date, to:

2 Mary Kosinski, Regulatory Legal Affairs Officer
3 Ana Starcevic, Paralegal Project Specialist
4 Catherine O'Neil, Consumer Legal Affairs Officer
5 Steven Fromholtz, Assistant Director – Consumer Protection Division
6 Aqueelah Currie, Licensing Supervisor
7 Linda Lutz, Legal Assistant
8 Arizona Department of Insurance
9 100 North 15th Ave., Suite 102
10 Phoenix, Arizona 85007-2624

11 **COPY** sent same date via electronic mail to:

12 Bruce R. Heurlin, Esq
13 BHeurlin@AZtopLawyers.com
14 Attorney for Respondents

15 Deian Ousounov, Assistant Attorney General
16 AdminLaw@azag.gov
17 Attorney for the Department of Insurance

18 Felicia DelSol
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20 Office of Administrative Hearings

21 
22 Francine Martinez

23
24
25
26

JAN 07 2020

DEPT. OF INSURANCE
BY: AS 01/07/2020

IN THE OFFICE OF ADMINISTRATIVE HEARINGS

In the Matters of:

No. 19A-048-INS

WILLIAMS, KOREASA MARIA
fka KOREASA WRIGHT
(National Producer No. 8430816)

ADMINISTRATIVE LAW JUDGE
DECISION

and

GLAM INSURANCE SERVICES, LLC
dba WILLIAMS AND ASSOCIATES
(National Producer No. 17893137)
Respondents

HEARING: October 23, 2019, followed by post-hearing submissions and memorandum, with record closed on December 17, 2019.

APPEARANCES: Bruce R. Heurlin, Esq., represented Respondent Koresa Maria Williams fka Koresa Wright (Williams) and Respondent Glam Insurance Services, LLC dba Williams and Associates (Glam).

Assistant Attorney General Deian Ousounov, Esq., appeared on behalf of the Arizona Department of Insurance (Department).

ADMINISTRATIVE LAW JUDGE: Kay A. Abramsohn

FINDINGS OF FACT

1. Williams is currently licensed as an Arizona resident insurance producer with lines of authority in life and accident and health or sickness insurance, National Producer Number 8430816. First licensed in Arizona as a non-resident licensee, with a home state of Indiana, her current Arizona license expires on September 30, 2020.

2. As of January 2019, William's addresses of record with the Department were as follows: Business, 7301 E. 22nd Street, #10-E, Tucson, AZ 85710;¹ Business e-

¹ Because 22nd Street in Tucson runs east-west, Williams' business address on Department's Exhibit 1 should be corrected; it is correct on Glam's record, in Department's Exhibit 3.

1 mail, kwsoftball19@gmail.com; and, Mailing/Residence, 10981 E. Sisken Place, Tucson,
2 AZ 85748.²

3 3. Glam is currently licensed as an Arizona resident business entity insurance
4 producer with lines of authority in life and accident and health or sickness insurance,
5 National Producer Number 17893137. First licensed in Arizona on March 25, 2016, the
6 license expires on March 31, 2020. Glam has not registered the assumed business name
7 of "Williams and Associates" with the Department.

8 4. Glam's business and mailing address of record with the Department is 7301
9 E. 22nd Street, Suite 10W, Tucson, AZ 85710.

10 5. Williams is the sole member and Designated Responsible Licensed
11 Producer for Glam.

12 2006 Application for a Non-Resident License

13 6. On or about July 29, 2006, Williams submitted an application for a non-
14 resident insurance producer's license under her maiden name, Koreasa Wright ("2006
15 Non-resident Application").³

16 7. In that Application, Williams answered "No" to the following background
17 question:

18 Have you ever been convicted of, or are you currently charged
19 with, committing a crime, whether or not adjudication was
20 withheld?

21 In that Application, Williams signed the Section VIII Authorization and Release section,
22 which includes an attestation statement that reads as follows:

23 I hereby attest that I have read and that I understand the
24 foregoing. I certify, under penalty of denial, suspension or
25 revocation of the license or under any other penalties that may
26 apply, that the answers, statements and information furnished
in connection with this license application are true, correct and
complete to the best of my knowledge and belief.

27 ² Her Indiana address in 2006, according to departmental records, was not the same address as that on
28 her 2006 non-resident application. Department Exhibit 2 and Department Exhibit 4. A licensee is required
29 to provide written notice to the Department of changes in address within 30 days of a change. At hearing,
Williams indicated that she had notified the Department of such changes.

³ Department Exhibit 4.

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2 2009 Application for an individual Resident Insurance License

3 8. On or about June 23, 2009, Williams submitted an application to the
4 Department for a resident producer's license as an accident health and life insurance
5 producer ("2009 Resident Application").⁴

6 9. In that application, Williams answered "No" to the following question in
7 Section V: Additional Information:

8 C. Have you EVER been found guilty of, have you had a
9 judgment made against you for, or have you admitted to, any
10 of the following: ... 4. Withholding, misappropriating,
11 converting or stealing money or property?

12 Williams signed Section VII: Authorization and Release of the 2009 Resident Application,
13 which includes an attestation statement that reads as follows:

14 You attest that you have read and that you understand the
15 foregoing. You certify, under penalty of denial, suspension or
16 revocation of the license or under any other penalties that may
17 apply, that the answers, statements and information furnished
18 in connection with this license application are true, correct and
19 complete to the best of my knowledge and belief.

20 2009 Indiana Administrative Action

21 10. On or about July 10, 2009, the Indiana Department of Insurance ("IDOI")
22 entered an administrative order ("Indiana Order") in Cause Number 5330-AG09-0701-
23 160.⁵ The Indiana Order specifically noticed Williams that her then-inactive Indiana
24 producer's license (inactive as of March 31, 2009, based on her failure to renew) would

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27 ⁴ Department Exhibit 5.

28 ⁵ Department Exhibit 6. It is noted that the Indiana Order was sent to Williams at a Tucson address, which
29 was not one of the addresses that Williams recounted at the hearing. At hearing, she indicated that, as an
30 employee, the secretaries would notify the Department of changes in addresses and often used the
"business" office address.

1 not be renewed based on the failure to notify the IDOI of a 2005 conviction for Conversion,
2 a misdemeanor.⁶

3 2012 Renewal Application

4 11. On or about August 28, 2012, Williams submitted a license renewal
5 application with the Department ("2012 Renewal Application").⁷ Williams answered
6 "No" to the following Background Questions of the 2012 Renewal Application:

7 Block A: Have you had any professional, vocational, business
8 license or certification refused, denied, suspended, revoked
9 or restricted, or a fine imposed by any public authority that has
10 not been previously disclosed in a written format by you to this
11 agency?

12 Block C: Have you been convicted or found guilty of, have you
13 had a judgment made against you for, or have you admitted
14 to any of the following that has not been previously disclosed
15 in a written format by you to this agency? ... 4. Withholding,
16 misappropriating, converting or stealing money or property?

17 In that Application, on July 20, 2012, Williams signed the Applicant Certification section
18 of the 2012 Renewal Application, certifying that all information in and attached to the
19 application was "true and correct to the best of my knowledge."

20 2014 Criminal Conviction

21 12. On or about August 19, 2014, the Arizona Superior Court in Pima County
22 found Williams guilty of Criminal Impersonation,⁸ a class 6 undesignated offense in case
23 No. CR20141770-001.⁹ The Court sentenced Williams to one year of probation.

24 13. The Department has no record of Williams disclosing the Criminal
25 Impersonation conviction to the Department as was required within 30 days pursuant to
26 A.R.S. § 20-301(B).

27 ⁶ The Indiana Order noted that, in 2005, Williams had been charged with Theft, a felony and that the charge
28 was "later reduced by plea agreement" to Conversion, a misdemeanor.

29 ⁷ Department Exhibit 7.

30 ⁸ A.R.S. S 13-2006 states: A. A person commits criminal impersonation by: 1. Assuming a false identity
with the intent to defraud another, or 2. Pretending to be a representative of some person or organization
with the intent to defraud; or 3. Pretending to be, or assuming a false identity of, an employee or a
representative of some person or organization with the intent to induce another person to provide or allow
access to property. This paragraph does not apply to peace officers in the performance of their duties. B.
Criminal impersonation is a class 6 felony.

⁹ Department Exhibit 8.

1 canceled, terminated; or, being assessed a fine, placed on
2 probation, sanctioned or surrendering a license to resolve and
3 administrative action. "Involved" also means being named as
4 a party to an administrative or arbitration proceeding, which is
5 related to a professional or occupational license, or
6 registration. "Involved" also means having a license, or
7 registration, application denied or the act of withdrawing an
8 application to avoid a denial. INCLUDE any business so
9 named because of your actions in our capacity as an owner,
partner, officer or director, or member or manager of a Limited
Liability Company. You may exclude terminations due solely
to noncompliance with continuing education requirements or
failure to pay a renewal fee. ...

10 In that online Application, Williams answered "Yes" to the Attestation section of the
11 2016 Renewal, which included a provision stating:

12 I hereby certify that, under penalty of perjury, all of the
13 information submitted in this application and attachments is
14 true and complete. I am aware that submitting false
15 information or omitting pertinent or material information in
16 connection with this is grounds for license revocation or denial
of the license and may subject me to civil or criminal penalties.

17 16. On or about April 1, 2019, the Department issued its Notice of Hearing
18 setting forth allegations on which the Department proposed to take disciplinary action
19 regarding the licenses of Williams and Glam. The Notice indicated that the Respondents
20 were required to file a written response within 20 days.

21 17. On or about April 19, 2019, through counsel, Respondents filed their
22 Answer both admitting and denying certain of the allegations, arguing that the allegations
23 did not adversely reflect on insurance business or insurance services, arguing that the
24 mistakes were "innocent," and that revocation would be an inappropriate sanction for such
25 "innocent" mistakes. Glam further indicated that it would take action to correct the failure
26 to notify the Department of the "DBA."

27 18. In 2004, Williams was an employee at a pharmacy, and it was her
28 responsibility to take daily deposits to the bank. As a single parent of a 4-year old, when
29 she was short on funds, she would write a check to the pharmacy and take out cash, but
30

1 not deposit the check in the bank until pay day. At some point in 2005, based on an audit
2 of the pharmacy, she was contacted about the actions, and she pled guilty "to take care
3 of" the matter. She argued that this was a misdemeanor and that she was not charged
4 until after she no longer worked for the pharmacy. She received a sentence of six months
5 of probation and had to pay court fees. She argued that the matter was discharged prior
6 to her moving to Arizona. At hearing, she argued that she understood this to be "check-
7 kiting," or floating a loan, and was not they withholding, misappropriating, converting or
8 stealing [of] money." She argued that she had correctly answered the questions on the
9 2006 Non-resident and 2009 Resident applications.

10 19. At hearing, Williams argued that she had never applied to renew her Indiana
11 license as she had moved to Arizona and had no intent to return to Indiana.¹³ In 2009,
12 when she applied for the Arizona "resident" licensure, she had done so in lieu of applying
13 to change her non-resident status to resident status with the Department, an action for
14 which would have resulted in paying fees.

15 20. At hearing, Williams indicated that she did not find out about the Indiana
16 Order until she applied to work for Americo in 2016 and, therefore, her answers (regarding
17 any other administrative action) on the 2012 and 2016 applications were "correct."

18 21. As to the 2014 Pima County judgment of "Criminal Impersonation," Williams
19 explained that she was helping her daughter ship a dog (via air) and, on Sunday night,
20 she discovered that she needed to have a veterinarian's certificate that the dog had its
21 shots but she could not obtain one so early in the morning for a 6 AM flight in November
22 of 2013 and, therefore, she simply printed out the certificate and signed the doctor's
23 name.¹⁴ At hearing, Williams argued that her answers on Glam 2016 application were
24 correct because she had no intent to defraud the buyer of the dog.

25 22. Regarding notification to the Department, Williams testified that her public
26 defender had printed out the paperwork and helped her fill it out. Williams stated that she

27 ¹³ At hearing, she indicated she moved to Arizona in August of 2006. Her Indiana licenses were issued
28 on July 29, 2006 (Accident/Health) and August 17, 2006 (Life). Department's Exhibit 2.

29 ¹⁴ The circumstances turned out to be that the dog had to be treated for parvo; Williams indicated that she
30 later refunded the \$1,400.00 paid for the dog to the buyer and also gave the buyer \$1,000.00 to "split" the
cost of the parvo treatment.

1 had driven to Phoenix (because there was no longer a Tucson office) to submit it to the
2 Department “within 30 days,” and had handed it in at the “desk” at the Department, not
3 obtaining a date stamp on her own copy. See Respondent’s Exhibit 11.

4 23. The “paperwork” allegedly submitted was accompanied by an application
5 dated May 14, 2014 for the Department to give “consent” for Williams to engage in
6 insurance business despite being “convicted” of a felony involving dishonesty or breach
7 of trust that had not been disclosed on an application. While that application itself calls
8 for submittal of specific information about the court process *and the result*, the May 14,
9 2014 cover letter was dated three months before the outcome and contains only minimal
10 information; the “copy” of the submittal provided to the hearing record does not contain
11 the allegedly-attached court documents.¹⁵

12 24. The Department has no record of receiving such documents.

13 25. On August 15, 2014, the Pima County Superior Court issued its Minute
14 Entry finding Williams guilty of Criminal Impersonation, a Class Six undesignated offense
15 and sentencing Williams to one year of probation, 20 hours of community restitution, and
16 specific court fees.¹⁶

17 26. At hearing, the Department argued that the alleged actions, as found and
18 admitted to by Williams were grounds for the Director to revoke the Respondents’
19 licenses. The Department argued that, once she found out about the Indiana Order,
20 Williams, to this day, she had not notified the Department.

21 27. At hearing, it was noted that the first page of the Department’s Exhibit 7 was
22 missing; the Department’s witness indicated that the page one was a page of instructions
23 from the online application. Post-hearing, the Department was unable to provide page
24 one because it was a document provided by an outside vendor, and the Department had
25 hoped to find the document in its archives but was unable to do so.

26 28. Subsequently, Respondents moved to dismiss the allegations, arguing that
27 the Department cannot meet its burden to demonstrate that Williams had not followed

28 ¹⁵ William’s May 14, 2014 cover letter noted initial charging information but not a “conviction” result and/or
29 any sentencing or fines.

30 ¹⁶ Department’s Exhibit 8.

1 application instructions on the 2006 and 2009 applications regarding the Indiana Order.
2 Further, Respondents argued that being unable to locate page one of the online
3 application was proof that the Department misfiled or lost Williams' submission – Exhibit
4 1'1 - in support of Williams' proof that she had filed the document with the Department,
5 which should result in dismissal of all the allegations in favor of Respondent Williams.

6 29. Finally, the Department noted that whether or not page one of the
7 instructions were available, the fact was that Williams had not truthfully answered the
8 specific questions on those applications. Further, the Department argued that whether a
9 page of instructions was no longer available on the data base in 2019 provided no support
10 for the alleged filing of May 2014 documents with the Department.

11 30. Respondents argued that the Department should not revoke but should
12 consider a lesser discipline, as was demonstrated that the Department often did through
13 various recent and past "Consent Orders" the Department had created with other
14 licensees.

15 **CONCLUSIONS OF LAW**

16 1. This matter is a disciplinary proceeding wherein the Department must prove
17 by a preponderance of the evidence that Respondents violated the State's Insurance
18 Laws. See A.A.C. R2-19-119.

19 2. Respondent Williams' conduct, as alleged and described above, constituted
20 violation of A.R.S. § 20-295(A)(3) in obtaining a license through misrepresentation, in that
21 Williams failed to disclose on her 2006, 2009, 2012 and 2016 applications, the 2005 felony
22 theft conviction. Additionally, in that Williams failed to disclose on her own and Glam's
23 2016 applications the 2014 conviction.

24 3. Respondent Williams' conduct, as alleged and described above,
25 constituted violation of A.R.S. § 20-295(A)(6) in having been convicted of a felony.

26 4. Respondent Williams' conduct, as alleged and described above, constituted
27 violation of A.R.S. § 20-301(A) in that Williams failed to report and notify the Director,
28 within 30 days of the final disposition of the Indiana Order, the administrative action taken
29 against her in that jurisdiction. Even if there were support for interpreting the statute as
30 being applicable to 30 days from when the action is "discovered," which there is not, the

1 hearing record demonstrated that, to this day, Williams has never so notified the
2 Department.

3 5. Respondent Williams' conduct, as alleged and described above, constituted
4 violation of A.R.S. § 20-295(A)(9) in that her insurance license in Indiana was, essentially,
5 denied and/or revoked, *i.e.*, "shall not be renewed", for failure to notify that jurisdiction of
6 the 2005 felony theft conviction.

7 6. Respondent Williams' conduct, as alleged and described above, constituted
8 violation of A.R.S. § 20-301(B) in that Williams failed to report and notify the Director of
9 the August 15, 2014 "conviction" in Pima County Superior Court. Williams would have
10 the Tribunal believe that she provided notice to the Department of the court action, *i.e.*,
11 the "charges" in May 2014 through Exhibit 11. However, the hearing record fails to
12 substantiate the claim of such a notification in May 2014 as the documents contained in
13 Exhibit 11 are neither date-stamped nor complete.

14 7. Respondent Williams' conduct, as alleged and described above, in
15 conducting Glam's business under a name not the legal name of the producer, and failing
16 to have so notified and properly reported such to the Department before using the
17 assumed name, constituted a violation of A.R.S. § 20-297(A).

18 8. Based on the foregoing, and pursuant to A.R.S. § 20-295(A), multiple
19 grounds exist for the Director of the Department to revoke Respondents' Licenses,
20 Williams' National Producer No. 8430816 and Glam's National Producer No. 17893137.

21 9. Respondents' argument that a lesser discipline should be considered fails
22 to acknowledge the serious circumstances herein of Respondent Williams' long-time
23 continued failure, and seemingly non-recognition of the 2005 felony theft "conviction."
24 Additionally, her stated confusion on what to report and where seems to be the basis for
25 the argument that these inaccuracies were "innocent mistakes." However, such an
26 argument belies the fact that Williams, in a pinch, simply plunged ahead and intentionally
27 forged a signature on a document that was to have been "certified" by a veterinarian.
28 Additionally, she stated that she did not understand the clear language on the Glam
29 business application, as the individual designated as principal with authority to exercise
30 the powers of the Glam license, that she needed to report personal convictions, the

1 Administrative Law Judge concludes that the Department's serious concerns are
2 warranted regarding Williams and Glam.

3 10. Based on the hearing record, the Administrative Law Judge concludes that
4 the Department's action to revoke the stated licenses should be upheld.

5 **RECOMMENDED ORDER**

6 The Director's action to revoke Williams' National Producer No. 8430816 and
7 Glam's National Producer No. 17893137 shall be upheld and Respondents' appeals shall
8 be denied.

9 *In the event of certification of the Administrative Law Judge Decision by the*
10 *Director of the Office of Administrative Hearings, the effective date of the Order will be*
11 *five (5) days from the date of that certification.*

12 Done this day, January 6, 2020.

13 /s/ Kay A. Abramsohn
14 Administrative Law Judge

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16 Transmitted electronically to:

17 Keith A. Schraad, Director
18 Arizona Department of Insurance
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