


LAWRENCE G. WASDEN  
Attorney General

A. RENÉ MARTIN – I.S.B. #3188  
Deputy Attorney General  
State of Idaho  
Department of Insurance  
700 w. State Street, 3<sup>rd</sup> Floor  
P.O. Box 83720  
Boise, Idaho 83720-0043  
Telephone: (208) 334-4204  
Facsimile: (208) 334-4298  
[rene.martin@doi.idaho.gov](mailto:rene.martin@doi.idaho.gov)

  
**FILED**  
**AUG 13 2013**  
Department of Insurance  
State of Idaho

*Attorneys for Department of Insurance*

**BEFORE THE DIRECTOR OF THE DEPARTMENT OF INSURANCE  
OF THE STATE OF IDAHO**

STATE OF IDAHO, DEPARTMENT OF  
INSURANCE,

Complainant,

vs.

PATRICK G. BRYANT, an Idaho resident  
producer holding Idaho Resident Producer  
License No. 149634,

Respondent.

Docket No. 18-2878-13

**ORDER OF DEFAULT REVOKING  
IDAHO RESIDENT PRODUCER  
LICENSE**

The Director of the Idaho Department of Insurance (Director), having reviewed the record on file herein; and it appearing therefrom that PATRICK G. BRYANT, the Respondent herein, has been duly served with a copy of the “Complaint for Revocation of Resident Producer License” (Complaint) filed on July 1, 2013, by the Idaho Department of Insurance (Department) in this administrative proceeding, which Complaint, a copy of which is attached hereto as Exhibit A, alleged violations of the Idaho Insurance Code by the Respondent; and further, as shown by

the Affidavit of A. René Martin, Deputy Attorney General, on file in this proceeding, that the Respondent has failed to request a hearing or to otherwise dispute in writing the allegations set forth in such Complaint; and good cause appearing therefor,

NOW, THEREFORE, IT IS HEREBY ORDERED that Idaho Resident Producer License No. 149634 issued to PATRICK G. BRYANT is HEREBY REVOKED.

IT IS FURTHER ORDERED that PATRICK G. BRYANT shall immediately return Idaho Resident Producer License No. 149634 to the Idaho Department of Insurance at P.O. Box 83720, Boise, Idaho 83720-0043.

**IT IS SO ORDERED.**

DATED this 12<sup>TH</sup> day of August, 2013.

STATE OF IDAHO  
DEPARTMENT OF INSURANCE

  
\_\_\_\_\_  
WILLIAM W. DEAL  
Director

**NOTICE REGARDING REPORTABLE PROCEEDINGS**

The foregoing is considered a reportable administrative proceeding. As such, it is a public record and is public information that may be disclosed to other states and reported to companies as to which the Respondent is actively appointed. This information will be reported to the National Association of Insurance Commissioners (NAIC) and will appear in the online searchable database of the Idaho Department of Insurance. The Respondent should be aware that this proceeding must be disclosed on any insurance license application and must be reported to any and all states in which the Respondent holds an insurance license.

### **NOTIFICATION OF RIGHTS**

This Order constitutes a final order of the Director. Any party may file a motion for reconsideration of this final order within fourteen (14) days of the service date of this order. The Director will dispose of the petition for reconsideration within twenty-one (21) days of its receipt, or the petition will be considered denied by operation of law. *See*, Idaho Code § 67-5246(4).

Pursuant to Idaho Code §§ 67-5270 and 67-5272, any party aggrieved by this final order may appeal it by filing a petition for judicial review in the district court of the county in which: (1) the hearing was held; or (2) the final agency action was taken; or (3) the aggrieved party resides or operates its principal place of business in Idaho; or (4) the real property or personal property that was the subject of the agency decision is located. An appeal must be filed within twenty-eight (28) days of: (a) the service date of this final order; or (b) an order denying a petition for reconsideration; or (c) the failure within twenty-one (21) days to grant or deny a petition for reconsideration, whichever is later. *See*, Idaho Code § 67-5273. The filing of a petition for judicial review does not itself stay the effectiveness or enforcement of the order under appeal.

**CERTIFICATE OF SERVICE**

I HEREBY CERTIFY that, on this 13th day of August, 2013, I caused a true and correct copy of the foregoing ORDER OF DEFAULT REVOKING IDAHO RESIDENT PRODUCER LICENSE to be served upon the following by the designated means:

Patrick G. Bryant  
12740 N. 12<sup>th</sup> Avenue  
Boise, ID 83714-9331

- first class mail
- certified mail
- hand delivery
- via facsimile

MetLife Investors USA Insurance Company  
5 Park Plaza, Suite 1900  
Irvine, CA 92614

- first class mail
- certified mail
- hand delivery
- via facsimile

A. Rene Martin  
Deputy Attorney General  
Idaho Department of Insurance  
700 W. State Street  
P.O. Box 83720  
Boise, ID 83720-0043

- first class mail
- certified mail
- hand delivery

  
\_\_\_\_\_  
Teresa Jones

LAWRENCE G. WASDEN  
Attorney General

A. RENÉ MARTIN – I.S.B. #3188  
Deputy Attorney General  
State of Idaho  
Department of Insurance  
700 W. State Street, 3<sup>rd</sup> Floor  
P.O. Box 83720  
Boise, ID 83720-0043  
Telephone: (208) 334-4204  
Facsimile: (208) 334-4298  
[rene.martin@doi.idaho.gov](mailto:rene.martin@doi.idaho.gov)

*Attorneys for Department of Insurance*

FILED 

JUL 01 2013

Department of Insurance  
State of Idaho

**BEFORE THE DIRECTOR OF THE DEPARTMENT OF INSURANCE  
OF THE STATE OF IDAHO**

STATE OF IDAHO, DEPARTMENT OF  
INSURANCE,

Complainant,

vs.

PATRICK G. BRYANT, an Idaho resident  
producer holding Idaho Resident Producer  
License No. 149634,

Respondent.

Docket No. 18-2878-13

**COMPLAINT FOR REVOCATION  
OF IDAHO RESIDENT PRODUCER  
LICENSE**

COMES NOW the State of Idaho, Department of Insurance (Department), by and through its counsel, A. René Martin, Deputy Attorney General, to complain and allege as follows:

1. This administrative proceeding is brought under the provisions of the Idaho Insurance Code, Idaho Code § 41-101 *et seq.*, including Idaho Code § 41-1016, which authorizes

the Department to initiate a contested case against an Idaho-licensed insurance producer, seeking revocation of the insurance producer's license, as well as the imposition of administrative penalties, if the Director finds, as to the licensee, that any one (1) or more of the causes or violations enumerated in subsections (1)(a) through -(n) of that section exist.

### **RESPONDENT**

2. PATRICK G. BRYANT (the Respondent) is a resident of the state of Idaho and is an Idaho-licensed insurance producer, currently holding Idaho Resident Producer License No. 149634. Such license was issued on March 9, 2007.

### **FACTS**

3. On or about October 24, 2012, the State of Washington, Office of Insurance Commissioner, entered its Findings of Fact, Conclusions of Law, and Final Order *In the Matter of Patrick Bryant, Licensee*, Docket No. 12-0086. Such order concluded that the Respondent had falsely altered internal insurance company documents, constituting "us[ing] fraudulent or dishonest practices," in violation of Washington insurance law, and imposed a five hundred dollar (\$500) penalty against the Respondent, which penalty was to be paid in two equal installments, with the first installment due January 2, 2013, and the second installment due April 2, 2013.

4. On or about April 8, 2013, the Insurance Commissioner of the State of Washington issued an Order Revoking License, in Docket No. 13-0121, which order revoked the Respondent's Washington nonresident insurance producer license, effective April 19, 2013. Such order was based on the Respondent's failure to make payment of either installment of the five hundred dollar (\$500) penalty imposed against him, as described in paragraph 3 above.

## CONCLUSIONS OF LAW AND VIOLATIONS

### *COUNT ONE: REVOCATION OF THE RESPONDENT'S INSURANCE LICENSE IN ANOTHER STATE*

5. Paragraphs 1 through 4 above are incorporated fully herein by this reference.

6. Idaho Code § 41-1016(1)(i) provides that the Director of the Department of Insurance (Director) may revoke the Idaho license of an insurance producer whose insurance producer license is denied, suspended, or revoked in any other state.

7. The revocation of Respondent's insurance producer license in Washington, as detailed in paragraph 4 above, constitutes cause for revocation of the Respondent's Idaho resident insurance producer license, pursuant to Idaho Code § 41-1016(1)(i).

### *COUNTS TWO AND THREE: FAILURE TO REPORT ADMINISTRATIVE ACTION TAKEN IN ANOTHER JURISDICTION*

8. Paragraphs 1 through 4 above are incorporated herein by this reference.

9. Idaho Code § 41-1021(1) provides that a producer shall report to the Director any administrative action taken against the producer in another jurisdiction within thirty (30) days of the final disposition of the matter. The orders described in paragraphs 3 and 4 above are administrative actions required to be reported by the Respondent to the Department within thirty (30) days of the final disposition. The Respondent failed to report the administrative actions described in paragraphs 3 and 4 above as required by Idaho Code § 41-1021(1).

10. Idaho Code § 41-1016(1)(b) permits the Director to revoke the license of a producer who violates any provision of title 41, Idaho Code. The Respondent's failure to report the two administrative actions taken against him by the Insurance Commissioner of the State of Washington, as referenced above, each constitutes a violation of Idaho Code § 41-1021(1),

authorizing the Director to revoke the Respondent's Idaho resident insurance producer license, pursuant to Idaho Code § 41-1016(1)(b).

*COUNT FOUR: VIOLATION OF ORDER OF ANOTHER STATE'S INSURANCE DIRECTOR*

11. Paragraphs 1 through 4 above are incorporated fully herein by this reference.

12. Idaho Code § 41-1016(1)(b) permits the Director to revoke the Idaho license of an insurance producer who violates an order of another state's insurance director.

13. The Respondent's failure to pay the penalty imposed against him by the Insurance Commissioner of the State of Washington, as described in paragraphs 3 and 4 above, constitutes cause for revocation of the Respondent's Idaho resident insurance producer license, pursuant to Idaho Code § 41-1016(1)(b).

**REQUEST FOR RELIEF**

14. Based on the foregoing, and pursuant to Idaho Code § 41-1016(1)(b) and -(i), the Department seeks issuance by the Director of an order revoking Idaho Resident Producer License No. 149634 held by the Respondent.

**NOTICE OF RIGHT TO A HEARING**

THE RESPONDENT IS HEREBY NOTIFIED, pursuant to Idaho Code § 41-232A(2), that a written request for a hearing must be filed and served upon the Department within twenty-one (21) days after service of this Complaint. Failure to file and serve a written request for a hearing upon the Department within the twenty-one (21) day time period shall be deemed a waiver of the opportunity for a hearing and to contest the allegations in the Complaint, pursuant to Idaho Code § 41-232A(2).

Any written request for a hearing shall be served on the Director of the Idaho Department of Insurance, addressed as follows:



William W. Deal, Director  
Idaho Department of Insurance  
P.O. Box 83720  
Boise, ID 83720-0043

A copy shall also be provided to the Department's counsel in this matter, A. René Martin,  
Deputy Attorney General, at the following address:

A. René Martin  
Deputy Attorney General  
Idaho Department of Insurance  
P.O. Box 83720  
Boise, ID 83720-0043

DATED this 15<sup>th</sup> day of July, 2013.

STATE OF IDAHO  
OFFICE OF THE ATTORNEY GENERAL



A. RENÉ MARTIN  
Deputy Attorney General

**CERTIFICATE OF SERVICE**

I HEREBY CERTIFY that, on this 1<sup>st</sup> day of July, 2013, I caused a true and correct copy of the foregoing COMPLAINT FOR REVOCATION OF IDAHO RESIDENT PRODUCER LICENSE to be served upon the following by the designated means:

Patrick G. Bryant  
12740 N. 12<sup>th</sup> Avenue  
Boise, ID 83714-9331

- first class mail
- certified mail
- hand delivery
- via facsimile

Metlife Investors USA Insurance Company  
5 Park Plaza, Suite 1900  
Irvine, CA 92614

- first class mail
- certified mail
- hand delivery
- via facsimile

  
\_\_\_\_\_  
Mandy Ary