STATE OF MAINE DEPARTMENT OF PROFESSIONAL AND FINANCIAL REGULATION BUREAU OF INSURANCE

In re:

Doris E. Karras

National Producer No. 16802045 Maine License No. PRN 241775

Docket No. INS-17-203

LICENSE REVOCATION
NOTICE, ORDER,
and
OPPORTUNITY FOR
HEARING

NOTICE TO DORIS E KARRAS:

Effective as of **March 24, 2017**, your Maine nonresident insurance producer license will be **REVOKED** without further formal proceedings unless you request a hearing as specified below.

The reasons for license revocation are as follows:

- 1. On November 8, 2014, you applied for a nonresident producer license in the State of Maine. On the Uniform Application, you answered "no" to all of the background questions and completed the attestation section which states:
 - I hereby certify that, under penalty of perjury, all of the information submitted in this application and attachments is true and complete. I am aware that submitting false information or omitting pertinent or material information in connection with this application is grounds for license revocation or denial of the license and may subject me to civil or criminal penalties.
- 2. Question 5 of the Uniform Application asks: "[a]re you currently a party to, or have you ever been found liable in, any lawsuit, arbitration or mediation proceeding involving allegations of fraud, misappropriation or conversion of funds, misrepresentation or breach of fiduciary duty?"
- 3. The Bureau issued a nonresident producer license with health and life authority on November 8, 2014, based on the representations in your application.
- 4. On January 26, 2016, you notified the Bureau of the December 18, 2015, revocation of your insurance producer license by the state of Minnesota. The revocation was based on the failure to make required disclosures on your licensing application and demonstrating a lack of fitness or trustworthiness. At that time, you also notified the Bureau of your August 2015 dismissal from a civil lawsuit initiated in September 2013.
- 5. The 2013 lawsuit, filed by Transamerica Life Insurance Company, named you as a defendant (Case No. SACV13-01658 AG (RNBx)) and alleged, inter alia, fraud, unjust enrichment, and violations of the federal Racketeer Influenced and Corrupt Organizations Act (RICO). This lawsuit was pending at the time of your Maine application and should have been disclosed accordingly. Your failure to disclose this pending lawsuit involving allegations of fraud on your application constitutes grounds for the revocation of your Maine insurance producer license pursuant to 24-A M.R.S. § 1420-

K(1)(A) for providing incorrect, misleading, incomplete or materially untrue information in the license application.

- 6. On September 30, 2016, the state of Tennessee revoked your insurance producer license and assessed a \$500 penalty for the failure to disclose the pending suit on your application and the failure to timely report your Minnesota revocation. This action was reported to the Bureau of Insurance on November 14, 2016. The revocation of your Minnesota and Tennessee insurance licenses constitutes grounds for revocation of your Maine license under 24-A M.R.S. § 1420-K(1)(I), for having an insurance producer license, or its equivalent, denied suspended or revoked in another state, province, district, or territory.
- 7. The Tennessee action was not timely reported to the Bureau as required by 24-A M.R.S. § 1420-P(1), which is an additional ground for revocation of your insurance license pursuant to 24-A M.R.S. § 1420-K(1)(B) for violating insurance laws.

Therefore, based upon the above grounds, your Maine insurance producer license is **revoked** as of **March 24, 2017,** pursuant to 24-A M.R.S. §§ 1417 and 1420-K, subject to your right to request a hearing.

Under the Maine Insurance Code, specifically 24-A M.R.S. §1417 and §1420-K, you have the right to a hearing before the Superintendent or his designee. If you request a hearing, you will have the right to present evidence and arguments in your defense, and the staff of the Bureau of Insurance will bear the burden of proving each violation by a preponderance of evidence.

If you request a hearing, you will receive further communication regarding scheduling. The matters to be determined through the hearing process are whether you committed one or more of the violations listed above, and if so, the appropriate sanctions for those violations. The sanctions imposed after a hearing can include any available remedy under applicable laws, including the payment of civil penalties.

To request a hearing, you must notify the Bureau of Insurance in writing no later than March 24, 2017. If you do not file a written request for a hearing within 30 days from the time you knew or reasonably should have known of the revocation of your license through this Notice and Order, you will lose your right to request a hearing on this license revocation Notice and Order.

Any request for a hearing, as well as all other communications regarding this Notice, Order, and Opportunity for Hearing must be addressed to Bureau Licensing Attorney Lindsay J. Laxon, Bureau of Insurance, #34 State House Station, Augusta, Maine 04333-0034 (for US Postal Service deliveries) or 76 Northern Avenue, Gardiner, Maine 04345 (for private carrier deliveries, such as FedEx or UPS). You may also reach Ms. Laxon by e-mail at Lindsay.J.Laxon@maine.gov or by telephone at (207) 624-8429.

February 17, 2017

Eric A. Cioppa

Superintendent of Insurance