

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

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***In re: Casey Francis Brougham***

Maine License Number: PRR98299  
National Producer No. 7872631  
**Docket No. INS-20-207**

**LICENSE REVOCATION  
NOTICE, ORDER,  
and  
OPPORTUNITY FOR  
HEARING**

***NOTICE TO CASEY FRANCIS BROUGHAM:***

Effective as of **June 15, 2020**, your Maine resident producer license will be **REVOKED** without further formal proceedings unless you request a hearing as specified below. The reasons for your license revocation are as follows:

1. On or around December 9, 2019, the Bureau of Insurance received a complaint from a Maine consumer, S.S., regarding your failure to respond to her inquiries about her insurance coverage. S.S. stated that she contacted your agency multiple times and left messages seeking assistance with adding a building to her existing policy and you never responded.
2. A complaint investigator for the Bureau wrote to you by regular mail on December 9, 2019, at your mailing address of record (also your agency address) regarding S.S.'s complaint. The correspondence advised that a response was required within 14 days pursuant to 24-A M.R.S. § 220. The Bureau did not receive a response, nor was the correspondence returned.
3. On February 10, 2020, the Bureau received a telephone call from the property management company responsible for the building in which your office was located. The management company advised that they were told that you had abandoned the office location; however, there were a significant number of insurance customer files left behind.
4. Also, on February 10, 2020, the Bureau of Insurance received a report from Scottsdale Insurance Company (hereinafter, Scottsdale) regarding one of your Maine clients. The Maine client, R.D., reported that he wrote a check to you in the amount of \$2,979.79 for a one-year Scottsdale commercial insurance policy. You provided R.D. with a signed receipt dated October 3, 2018 and cashed the check on or around October 5, 2018. Scottsdale reported that in September 2019, R.D. inquired about the commercial insurance policy. Scottsdale confirmed that no policy ever existed and that the payment for \$2,979.79 was not remitted to the insurer.
5. On February 11, 2020, the Bureau's Licensing Attorney left you a voicemail on your business phone number requesting an immediate return call. A call to your home telephone number was disconnected when the Licensing Attorney asked to speak to you.
6. The Bureau's investigator sent you a follow up inquiry regarding the S.S. complaint by regular mail on February 12, 2020, to your home address. The correspondence advised that a response was required within 14 days pursuant to 24-A M.R.S. § 220. The Bureau did not receive a response, nor was the correspondence returned.

7. The Bureau's Licensing Attorney then sent a letter to your home address on February 13, 2020, by regular and certified mail requesting information related to your failure to respond to the S.S. complaint and the current status of your agency location. You were advised of the previous unsuccessful efforts to contact you and directed to contact the Bureau as soon as possible. The certified letter was returned as unclaimed, but the copy sent by regular mail was not returned to the Bureau.

8. The Bureau's investigator sent a third request regarding the S.S. complaint on February 24, 2020 to your home address. The correspondence advised that a response was required within 14 days pursuant to 24-A M.R.S. § 220. The Bureau did not receive a response, nor was the correspondence returned.

9. On February 26, 2020, you contacted the Bureau's complaint investigator by telephone and advised that a response would be forthcoming by email. The Bureau did not receive any additional communication from you regarding S.S.'s complaint.

10. The Bureau's Licensing Attorney successfully contacted you by telephone on February 27, 2020. You advised that you were in the process of working with your landlord regarding your agency lease and that you were looking at your options for other locations. The Licensing Attorney explained your obligations to safeguard your client files and to keep your licensing record up-to-date including address changes in accordance with 24-A M.R.S. § 1419. She emailed you a change of address form to complete. The Bureau did not receive any updated contact information. The Licensing Attorney also explained that you were out of compliance with your continuing education as described in Paragraph 11. There was no further communication with you after February 27, 2020.

11. In accordance with 24-A M.R.S. §§ 1482, 1484, and Bureau of Insurance Rule Chapter 542, all resident producers must complete 24 hours of continuing education credits every two years before their compliance date. Your continuing education compliance date was January 31, 2020 and, to date, you have not completed any of the required credit hours. Your failure to complete your required continuing education represents grounds for the revocation of your insurance producer license pursuant to 24-A M.R.S. § 1484 and 1420-K(1)(B).

12. As described in Paragraphs 2 and 6-8, your failure to respond to Bureau complaint inquiries represents grounds for the revocation of your insurance producer license pursuant to 24-A M.R.S. § 220 and 1420-K(1)(B) for violating insurance laws.

13. As described in Paragraph 4, your failure to properly remit R.D.'s premium to the insurer represents grounds for the revocation of your insurance producer license pursuant to 24-A M.R.S. § 1420-K(1)(D) for improperly withholding, misappropriating or converting any money or properties received in the course of doing insurance business.

14. As described in Paragraph 10, you failed to update your mailing address. This represents grounds for the revocation of your insurance producer license pursuant to 24-A M.R.S. § 1419 and 1420-K(1)(B) for violating insurance laws.

Therefore, based upon the above grounds, your nonresident producer license is revoked as of **June 15, 2020**, pursuant to 24-A M.R.S. §§ 1417(1) and 1420-K, subject to your right to request a hearing. Under the Maine Insurance Code, specifically 24-A M.R.S. § 1417(1) and § 1420-K, you have the right to a hearing before the Superintendent or his designee to appeal this action. If you request a hearing, you will have the right to present evidence and arguments in your defense.

**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 imposition of civil penalties.**

To request a hearing, you must notify the Bureau of Insurance in writing no later than **June 15, 2020**. 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 this act through this Notice and Order, you will lose your right to request a hearing on this matter. Pursuant to 24-A M.R.S. § 213(3), this Notice from the Superintendent to you shall be deemed to have been given when deposited in a mail depository of the United States Post Office.

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](mailto:Lindsay.J.Laxon@maine.gov) or by telephone at (207) 624-8429.

**May 12, 2020**



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Eric A. Cioppa  
Superintendent of Insurance