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| ***In re*: Eric Munyarugamba**<br><br>**National Producer No. 21500739**<br>**Maine License No. PRR509469**<br>**Docket No. INS-26-251** | **DECISION AND ORDER** |

## I. PROCEDURAL HISTORY

On April 9, 2026, Maine Bureau of Insurance Superintendent Robert L. Carey issued a Revocation Order revoking Eric Munyarugamba's resident insurance producer license. The Superintendent's Order was subject to Mr. Munyarugamba's ability to request a hearing in this matter. Mr. Munyarugamba timely requested a hearing on April 13, 2026. On April 14, 2026, Superintendent Carey issued a Delegation Order, delegating decision-making authority in this matter to Senior Staff Attorney Stacy Bergendahl, pursuant to 24-A M.R.S. § 210. The hearing on this matter was held at 2:00 p.m. (ET) on May 11, 2026, in the Central Conference Room at the Maine Bureau of Insurance in the Department of Professional & Financial Regulation Building, 76 Northern Avenue, Gardiner, Maine. The Respondent, Eric Munyarugamba, appeared remotely.

The Superintendent's Revocation Order was based on the following allegations:

1) That at the time of application for a resident producer license and at the time of taking the licensing examination for a Maine resident producer license, Mr. Munyarugamba did not reside in Maine, as is required by 24-A M.R.S. §1420-A(2);

2) That Mr. Munyarugamba falsely certified that the information listed in the application including his place of address was true and correct under penalty of perjury in violation of 24-A M.R.S. § 1420-E (1); and

3) That the Bureau sent an information request on March 16, 2026, and that Mr. Munyarugamba failed to respond to this request within 10 business days of receipt of the request as required by 24-A M.R.S. § 220(2).

In response to the Notice of Hearing, on May 4, 2026, Bureau staff filed a Request for Clarification asking to include a citation to the definition of "resident" and to clarify the specific applicable provisions of 24-A M.R.S. § 1420-K. An amended Notice of Hearing was issued on May 5, 2026, to note that 24-A M.R.S. §1402(12) defines "resident" with respect to an individual as "domiciled in this State" or "whose principal place of business is located in this State" and to specify that the applicable provisions of 24-A M.R.S. § 1420-K were §1420-K(1)(A) and (B). The Amended Notice also changed the arrangement of information to clarify the issues to be addressed at the hearing.

Prior to the hearing, Bureau staff submitted 23 exhibits. The exhibits were offered into evidence without objection.

## II. STANDARD OF REVIEW

Under 24-A M.R.S. § 1417(1) and § 1420-K(1) the Superintendent may take disciplinary action against a licensee, including revocation, for any one of several causes.

One of the causes that warrants disciplinary action is "providing incorrect, misleading, incomplete or materially untrue information in the license application" in violation of 24-A M.R.S. § 1420-K(1)(A).

Another cause that warrants disciplinary action is if a licensee "violat[es] any insurance laws, or violat[es] any rule, regulation, subpoena or order of the superintendent" under the provisions of 24-A M.R.S. §1420-K(1)(B).

The provisions of 24-A M.R.S. § 1420-E govern the submission of an application for a resident producer license and there are two questions of violation in regard to this section. First, an applicant commits a violation of law under 24-A M.R.S. § 1420-E(1) if the applicant falsely certifies that the information listed in the application was true and correct under penalty of perjury, thus a person falsely certifying information in an application would warrant revocation under 24-A M.R.S. §1420-K(1)(B) due to violating an insurance law. Second, the definition of "resident" applicable to this section is found in 24-A M.R.S. §1402(12) and states that a resident with respect to an individual means "[a]n individual who is domiciled in this State". The Revocation Order alleged that at the time of application for a resident producer license and at the time of taking the licensing examination for a Maine resident producer license, Mr. Munyarugamba did not reside in Maine, as is required by 24-A M.R.S. §1420-A(2).

A licensee commits a violation if the licensee fails to respond to a request for information from the Bureau within 10 business days of the receipt of the request in violation of 24-A M.R.S. § 220(2), which would also warrant revocation under 24-A M.R.S. §1420-K(1)(B) due to violating an insurance law.

The purpose of the hearing in this matter was to determine whether Mr. Munyarugamba violated any of the provisions cited by the Superintendent and if there was a violation, what sanction, if any is appropriate.

## III. FINDINGS OF FACT AND CONCLUSIONS OF LAW

### Providing Incorrect Information in the License Application

The evidence submitted in this case shows that Mr. Munyarugamba submitted an application for a Maine resident insurance producer's license on March 4, 2025, that listed an address where he did not live at the time the application was submitted or at any point since that time.

I hereby find that Mr. Munyarugamba has violated 24-A M.R.S. § 1420-K(1)(A) by providing incorrect information as to his address on the Maine resident producer application form submitted to the Bureau.

### Falsely Certifying Information Submitted on an Application

The evidence submitted in this case shows that Mr. Munyarugamba falsely attested that the information regarding his address on his application submitted on March 4, 2025, was true and correct when in fact the information regarding his address was untrue and incorrect at the time he attested to the information in the application.

I hereby find that Mr. Munyarugamba has violated 24-A M.R.S. § 1420-E by falsely attesting to the truth of incorrect information as to his address on the application. By virtue of violating 24-A M.R.S. § 1420-E, Mr. Munyarugamba also stands in violation of 24-A M.R.S. § 1420-K(1)(B).

Submitting a Resident Application While Not a Resident

The evidence presented in this case shows that Mr. Munyarugamba was not domiciled in Maine at the time of taking the required licensing exam for a Maine resident producer's license or at the time of submitting an application for a Maine resident producer's license, and therefore was not a resident for the purposes of the application.

I find that Mr. Munyarugamba made a mistake in submitting an application for a resident license while not actually a resident of this State. However, considering the provisions of the definitions of "resident" in 24-A M.R.S. § 1402(12) and of "home state" in 24-A M.R.S. § 1420-A, and the substance of 24-A M.R.S. § 1420-E(1), none of these provisions impose a duty on the applicant to only submit an application if the applicant is a resident, nor do they impose a prohibition on submitting an application under those sections if one is not a resident under the applicable definition. The necessary findings listed in § 1420-E(1) do not include a finding of residency. If neither a duty nor prohibition is imposed then no violation of the nonexistent duty or prohibition is possible. Therefore, I find that Mr. Munyarugamba did not violate the relevant provisions of Title 24-A when mistakenly submitting an application for a resident license when not a resident. The conduct of filing a document with a state agency that contains false information may otherwise constitute criminal conduct under Title 17-A, but that is outside the scope of the administrative jurisdiction of the Bureau.

Failure to Respond to Bureau Request for Information

The evidence presented in this case shows that the Bureau sent Mr. Munyarugamba a request for information on March 16, 2026, that Mr. Munyarugamba received the emailed version of the request, and that Mr. Munyarugamba did not respond to the questions asked in the request for information in any communication with the Bureau subsequent to receiving the request.

I hereby find that Mr. Munyarugamba has violated 24-A M.R.S. § 220(2) by failing to respond to a request for information from the Bureau within 10 days. By virtue of violating 24-A M.R.S. § 220(2), Mr. Munyarugamba also stands in violation of 24-A M.R.S. § 1420-K(1)(B).

## IV. CONCLUSION AND ORDER

Mr. Munyarugamba committed violations of § 1420-K(1)(A), 24-A M.R.S. § 1420-E, 24-A M.R.S. § 220(2), and 24-A M.R.S. § 1420-K(1)(B). Any one of these violations could warrant revocation under the operation of 24-A M.R.S. §§ 1417 and 1420-K, so revocation for multiple violations is warranted. It is therefore ordered that Mr. Munyarugamba's resident producer license is hereby REVOKED.

## V. NOTICE OF APPEAL RIGHTS

This Decision and Order is a final agency action of the Superintendent of Insurance within the meaning of the Maine Administrative Procedure Act. It may be appealed to the Superior Court in the manner provided by 24-A M.R.S. § 236, 5 M.R.S. § 11001, *et seq*. and M.R. Civ. P. 80C. Any party to the proceeding may initiate an appeal within thirty days after receiving this notice. Any aggrieved non-party whose interests are substantially and directly affected by this Decision and Order may initiate an appeal within forty days of the issuance of this decision. There is no automatic stay pending appeal; an application for stay may be made in the manner provided in 5 M.R.S. § 11004.

PER ORDER OF THE SUPERINTENDENT OF INSURANCE

June 1, 2026

Stacy L. Bergendahl
Senior Staff Attorney
Maine Bureau of Insurance

cc: Eric Munyarugamba, Courtney Awale, Lisa Wilson