

**STATE OF MAINE
BUREAU OF INSURANCE**

**In re:
DEBORAH J. PATTERSON
National Producer Number 8638077**

**Docket No. INS-11-217
CONSENT AGREEMENT**

This document is a Consent Agreement authorized by Title 10 M.R.S. § 8003(5), entered into among Deborah J. Patterson, a resident of Arizona; the Maine Superintendent of Insurance; and the Maine Office of the Attorney General. Its purpose is to resolve, in lieu of an adjudicatory proceeding, a violation of the Insurance Code for which the Superintendent may impose discipline pursuant to Title 24-A M.R.S. §1417(1) and §§1420-K(1)(A).

STATEMENT OF FACTS

1. The Superintendent of Insurance is the official charged with administering and enforcing Maine's insurance laws and regulations, and the Bureau of Insurance is the administrative agency with such jurisdiction. The Superintendent has jurisdiction over this matter pursuant to the Insurance Code generally, Title 24-A Maine Revised Statutes, in particular, 24-A M.R.S. §§ 12-A, 211, and 229, as well as other provisions.
2. Deborah J. Patterson applied for licensing in Maine as a nonresident insurance producer in July 2011.
3. When Ms. Patterson applied for a Maine Resident Producer License, she answered "No" to background question Number One on the application form which she electronically filed: "Have you ever been convicted of a crime, had a judgment withheld or deferred, or are you currently charged with committing a crime?"
4. Ms. Patterson also answered "No" to background question Number Two on the application that asked: "Have you ever been named or involved as a party in an administrative proceeding regarding any professional or occupational license or registration?"
5. The application included Ms. Patterson's "Certification and Attestation" with the statement:

"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."

6. In fact, Ms. Patterson had been convicted of "Possession of Dangerous Drugs and Drug Paraphernalia" in October, 1992.

7. Ms. Patterson had also been the subject of a consent agreement in 2006 with the Georgia Department of Insurance, under which her license was issued subject to a 24 month period of probation due to the above conviction.
8. In response to a question from Bureau licensing staff regarding why she did not disclose the above as required, the response submitted on behalf of Ms. Patterson stated, with regard to the Georgia administrative action: "Deborah thought that since the probation period was over that she could answer no to that question." With regard to the 2002 conviction, the response stated: "She also should have answered yes to question #1 but she forgot about the incident since it was so long ago."

CONCLUSIONS OF LAW

9. The application form's disclosure questions specifically require disclosure of any criminal convictions, including misdemeanors. Ms. Patterson provided incorrect, misleading, incomplete or materially untrue information in her Maine application for nonresident producer licensing by failing to disclose the 1994 misdemeanor conviction when she applied, and certifying through the "Certification and Attestation" on the application that the information was true and complete, and she has not provided an adequate legal explanation for her failure to provide accurate information in her application.
10. The provision of incorrect, misleading, incomplete or materially untrue information in a license application constitutes grounds for denial of the license application, revocation of the license, or other appropriate action, including the imposition of a civil penalty, under 24-A M.R.S. §1420-K(1)(A).

COVENANTS

11. Deborah J. Patterson, the Maine Superintendent of Insurance, and the Maine Office of the Attorney General agree to the following.
12. This Consent Agreement is entered into in accordance with 10 M.R.S. § 8003(5)(B) and is enforceable by an action in the Superior Court.
13. This Consent Agreement is not subject to appeal. Ms. Patterson waives any further hearings or appeals regarding the matters that are the subject of this Consent Agreement.
14. At the time of executing this Consent Agreement, Ms. Patterson will remit to the Maine Bureau of Insurance a civil penalty in the amount of \$500.00, payable to the Treasurer of the State of Maine.
15. Ms. Patterson will promptly report any matters to the Maine Bureau of Insurance during all times as she is licensed through the Bureau, to the extent such reporting is required under the Maine Insurance Code, and will comply in all other respects with the provisions of the Maine Insurance Code, as applicable.
16. Ms. Patterson understands and acknowledges that this Agreement will constitute a public record within the meaning of 1 M.R.S. § 402, and will be available for public inspection and copying as provided for by 1 M.R.S. § 408, and will be reported to the NAIC "RIRS" database.
17. In consideration of the applicant's execution of and compliance with the terms of this Consent Agreement, the Superintendent of Insurance, Bureau of Insurance, and Office of the Attorney General agree to forgo pursuing against Ms. Patterson further disciplinary

measures or other civil or administrative sanctions available under the Maine Insurance Code that relate to the specific conduct described in this Consent Agreement, other than those agreed to herein. However, should Ms. Patterson violate this Consent Agreement, she may be subject to any available legal remedy for the violation, including without limitation the suspension or revocation of all licenses issued under the Maine Insurance Code.

18. Nothing in this Agreement shall affect the rights or interests of any person who is not a party to this Agreement.

DEBORAH J. PATTERSON

Dated: _____, 2011

Deborah J. Patterson

THE MAINE SUPERINTENDENT OF INSURANCE

Dated: _____, 2011

Eric A. Cioppa, Acting Superintendent

FOR THE OFFICE OF THE ATTORNEY GENERAL

Dated: _____, 2011

Assistant Attorney General

(printed name)