

STATE OF CONNECTICUT
INSURANCE DEPARTMENT

CONNECTICUT INSURANCE DEPARTMENT
EXHIBIT A

IN THE MATTER OF:

ANDREA V. BROWN

Docket No. FC 15-102

COMPLAINT

The Insurance Commissioner of the State of Connecticut, having reason to believe that Andrea V. Brown engaged in acts of conduct as set forth herein, which, if true, would violate Sections 38a-16, 38a-660, 38a-769, 38a-815 and 38a-818 of the Connecticut General Statutes and would constitute cause under Sections 38a-2, 38a-774 and 38a-817 of the Connecticut General Statutes for the suspension or revocation of insurance licenses issued by the Insurance Department and/or for the imposition of a fine, and it appearing to the Insurance Commissioner that a proceeding in respect thereof would be in the public interest, hereby issues this Complaint alleging the charges in that regard as follows:

COUNT I

- 1. Andrea V. Brown, hereinafter referred to as "Respondent" is licensed as a surety bail bond agent, license number 2404015, by the State of Connecticut Insurance Department, hereinafter referred to as "Department".
2. The Respondent was subject to a compliance examination by the Department on April 8, 2014, covering the period May 1, 2012 through September 30, 2013, and the resulting report submitted to the Department indicates that the Respondent executed the following bonds:

Table with 3 columns: Defendant, Execution Date, Bond Amount. Contains 8 rows of data with defendant names redacted.

- 3. The same report indicates that the Respondent entered into a premium financing agreement and failed to file a civil action seeking appropriate relief with the court for payments due (60) days in arrears on the aforementioned bonds.
4. The conduct as described above, if true, is a violation of Sections 38a-660, 38a-660c(b), 38a-815, 38a-818 and 38a-825 of the Connecticut General Statutes and constitutes cause for the suspension or revocation of her licenses and/or the imposition of fines pursuant to Sections 38a-2, 38a-660l, 38a-774 and 38a-817 of the Connecticut General Statutes.

COUNT II

1. Paragraph 1 of Count I is incorporated herein by reference as paragraph 1 of this Count, as though fully set forth herein.
2. The same report indicates that the Respondent executed the following bonds and (1) collected an initial premium that was less than the approved premium rate; (2) failed to maintain a premium financing arrangement for the remainder of the premium balance due; and (3) failed to charge and collect the approved premium rate:

<u>Defendant</u>	<u>Execution Date</u>	<u>Bond Amount</u>
[REDACTED]	6/7/12	25,000
[REDACTED]	6/11/12	25,000, 10,000
[REDACTED]	8/3/12	20,000
[REDACTED]	10/18/12	50,000
[REDACTED]	12/13/12	100,000, 35,000
[REDACTED]	12/13/12	10,000, 5,000
[REDACTED]	12/29/12	25,000
[REDACTED]	3/13/13	5,000
[REDACTED]	4/1/13	25,000
[REDACTED]	5/1/13	2,500
[REDACTED]	5/7/13	50,000
[REDACTED]	8/16/13	20,000

3. The conduct as described above, if true, is a violation of Sections 38a-660, 38a-660b, 38a-660c, 38a-815, 38a-818 and 38a-825 of the Connecticut General Statutes and constitutes cause for the suspension or revocation of her licenses and/or the imposition of fines pursuant to Sections 38a-2, 38a-660l(a), 38a-774 and 38a-817 of the Connecticut General Statutes.

COUNT III

1. Paragraph 1 of Count I is incorporated herein by reference as paragraph 1 of this Count, as though fully set forth herein.
2. The same report indicates that the Respondent executed the following bonds, and charged a premium rate greater than the approved premium rate:

<u>Defendant</u>	<u>Execution Date</u>	<u>Bond Amount</u>
[REDACTED]	8/12/12	5,000
[REDACTED]	9/22/12	10,000, 5,000
[REDACTED]	4/4/13	25,000

3. The conduct as described above, if true, is a violation of Sections 38a-660, 38a-660b, 38a-815 and 38a-818 of the Connecticut General Statutes and constitutes cause for the suspension or revocation of her licenses and/or the imposition of fines pursuant to Sections 38a-2, 38a-660l(a), 38a-774 and 38a-817 of the Connecticut General Statutes.

COUNT IV

1. Paragraph 1 of Count I is incorporated herein by reference as paragraph 1 of this Count, as though fully set forth herein.
2. The same report indicates that the Respondent executed the following bonds, and failed to charge and collect an initial premium on the date the bonds were executed:

<u>Defendant Name</u>	<u>Execution Date</u>	<u>Bond Amount</u>
██████████	10/18/12	50,000
██████████	12/29/12	25,000

3. The conduct as described above, if true, is a violation of Sections 38a-660, 38a-660c, 38a-815, 38a-818 and 38a-825 of the Connecticut General Statutes and constitutes cause for the suspension or revocation of her licenses and/or the imposition of fines pursuant to Sections 38a-2, 38a-660(a), 38a-774 and 38a-817 of the Connecticut General Statutes.

COUNT V

1. Paragraph 1 of Count I is incorporated herein by reference as paragraph 1 of this Count, as though fully set forth herein.
2. The same report indicates that the Respondent executed the following bonds, and failed to maintain a signed bail bond application:

<u>Defendant Name</u>	<u>Execution Date</u>	<u>Bond Amount</u>
██████████	7/9/12	25,000
██████████	8/4/13	1,500, 1,000
██████████	8/18/13	75,000, 15,000
██████████	9/5/13	10,000
██████████	9/11/13	50,000
██████████	9/13/13	5,000
██████████	9/14/13	5,000

3. The conduct as described above, if true, is a violation of Sections 38a-660, 38a-660d, 38a-815 and 38a-818 of the Connecticut General Statutes and constitutes cause for the suspension or revocation of her licenses and/or the imposition of fines pursuant to Sections 38a-2, 38a-660(a), 38a-774 and 38a-817 of the Connecticut General Statutes.

COUNT VI

1. Paragraph 1 of Count I is incorporated herein by reference as paragraph 1 of this Count, as though fully set forth herein.
2. The same report indicates that the Respondent executed the following bonds, and failed to maintain a completed defendant authorization form:

<u>Defendant Name</u>	<u>Execution Date</u>	<u>Bond Amount</u>
[REDACTED]	8/4/13	1,500, 1,000

3. The conduct as described above, if true, is a violation of Sections 38a-660, 38a-660d, 38a-660j(a)(9), 38a-815 and 38a-818 of the Connecticut General Statutes and constitutes cause for the suspension or revocation of her licenses and/or the imposition of fines pursuant to Sections 38a-2, 38a-660l(a), 38a-774 and 38a-817 of the Connecticut General Statutes.

COUNT VII

1. Paragraph 1 of Count I is incorporated herein by reference as paragraph 1 of this Count, as though fully set forth herein.
2. The same report indicates that the Respondent executed the following bonds, and failed to maintain a completed indemnity agreement:

<u>Defendant Name</u>	<u>Execution Date</u>	<u>Bond Amount</u>
[REDACTED]	5/1/13	2,500
[REDACTED]	8/4/13	1,500, 1,000

3. The conduct as described above, if true, is a violation of Sections 38a-660, 38a-660d(b), 38a-660e, 38a-815 and 38a-818 of the Connecticut General Statutes and constitutes cause for the suspension or revocation of her licenses and/or the imposition of fines pursuant to Sections 38a-2, 38a-660l(a), 38a-774 and 38a-817 of the Connecticut General Statutes.

COUNT VIII

1. Paragraph 1 of Count I is incorporated herein by reference as paragraph 1 of this Count, as though fully set forth herein.
2. The same report indicates that the Respondent collected premium payments due for bonds placed in accordance with the terms of the premium agreements entered into by the defendants under such bonds, but failed to provide documentation in support of remitting premiums due to her General Agents pursuant to her agreement with her General Agents.
3. The conduct as described above, if true, is a violation of Sections 38a-660, 38a-660d(a), 38a-660d(b), 38a-660e, 38a-769, 38a-815 and 38a-818 of the Connecticut General Statutes and constitutes cause for the suspension or revocation of her licenses and/or the imposition of fines pursuant to Sections 38a-2, 38a-660l(a), 38a-774 and 38a-817 of the Connecticut General Statutes.

COUNT IX

1. Paragraph 1 of Count 1 is incorporated herein by reference as paragraph 1 of this Count, as though fully set forth herein.

2. The same report indicates that the Respondent failed to provide the following (99) ninety-nine bond files to the auditors for review. These bonds were reflected in her turn-in sheets as being executed by her during the period of June 4, 2012 through August 23, 2013.

	<u>Defendant</u>	<u>Execution Date</u>	<u>Bond Amount</u>
1.	[REDACTED]	6/4/12	5,000
2.	[REDACTED]	6/6/12	3,000
3.	[REDACTED]	6/8/12	5,000
4.	[REDACTED]	6/10/12	20,000
5.	[REDACTED]	6/10/12	7,500
6.	[REDACTED]	6/11/12	25,000
7.	[REDACTED]	6/23/12	500
8.	[REDACTED]	6/23/12	500
9.	[REDACTED]	6/24/12	5,000
10.	[REDACTED]	6/28/12	3,000
11.	[REDACTED]	6/29/12	5,000
12.	[REDACTED]	6/30/12	1,500
13.	[REDACTED]	7/6/12	2,500
14.	[REDACTED]	7/6/12	5,000
15.	[REDACTED]	7/9/12	500
16.	[REDACTED]	7/9/12	500
17.	[REDACTED]	7/13/12	1,000
18.	[REDACTED]	7/13/12	100,000
19.	[REDACTED]	7/18/12	5,000
20.	[REDACTED]	7/19/12	5,000
21.	[REDACTED]	7/19/12	500
22.	[REDACTED]	7/24/12	1,000
23.	[REDACTED]	7/29/12	5,000
24.	[REDACTED]	7/31/12	1,000
25.	[REDACTED]	7/31/12	5,000
26.	[REDACTED]	8/1/12	10,000
27.	[REDACTED]	8/1/12	10,000
28.	[REDACTED]	8/3/12	3,000
29.	[REDACTED]	8/3/12	15,000
30.	[REDACTED]	8/3/12	15,000
31.	[REDACTED]	8/3/12	2,500
32.	[REDACTED] rt	8/6/12	2,500
33.	[REDACTED]	8/7/12	1,500
34.	[REDACTED]	8/9/12	500
35.	[REDACTED]	8/22/12	2,500
36.	[REDACTED] s	8/24/12	5,000
37.	[REDACTED]	8/24/12	50,000
38.	[REDACTED]	8/24/12	50,000
39.	[REDACTED]	8/25/12	500
40.	[REDACTED]	8/27/12	500
41.	[REDACTED]	8/27/12	500

<u>Defendant</u>	<u>Execution Date</u>	<u>Bond Amount</u>
42. [REDACTED]	8/27/12	500
43. [REDACTED]	8/27/12	500
44. [REDACTED]	9/1/12	10,000
45. [REDACTED]	9/3/12	500
46. [REDACTED]	9/8/12	500
47. [REDACTED]	9/22/12	5,000
48. [REDACTED]	9/25/12	3,000
49. [REDACTED]	9/26/12	25,000
50. [REDACTED]	9/26/12	1,000
51. [REDACTED]	9/26/12	5,000
52. [REDACTED]	9/28/12	5,000
53. [REDACTED]	9/30/12	1,000
54. [REDACTED]	10/5/12	75,000
55. [REDACTED]	10/7/12	500
56. [REDACTED]	10/7/12	500
57. [REDACTED]	10/10/12	5,000
58. [REDACTED]	10/16/12	500
59. [REDACTED]	10/21/12	5,000
60. [REDACTED]	11/3/12	5,000
61. [REDACTED]	11/3/12	1,000
62. [REDACTED]	11/8/12	2,500
63. [REDACTED]	11/10/12	5,000
64. [REDACTED]	11/12/12	2,500
65. [REDACTED]	11/14/12	5,000
66. [REDACTED]	11/14/12	5,000
67. [REDACTED]	11/14/12	5,000
68. [REDACTED]	11/14/12	5,000
69. [REDACTED]	11/17/12	5,000
70. [REDACTED]	11/18/12	1,000
71. [REDACTED]	11/20/12	5,000
72. [REDACTED]	11/24/12	500
73. [REDACTED]	11/29/12	1,000
74. [REDACTED]	12/29/12	500
75. [REDACTED]	12/30/12	15,000
76. [REDACTED]	12/31/12	5,000
77. [REDACTED]	1/1/13	2,500
78. [REDACTED]	1/5/13	5,000
79. [REDACTED]	1/5/13	5,000
80. [REDACTED]	4/11/13	10,000
81. [REDACTED]	4/11/13	500
82. [REDACTED]	4/11/13	10,000
83. [REDACTED]	4/11/13	10,000
84. [REDACTED]	4/11/13	10,000
85. [REDACTED]	4/27/13	30,000
86. [REDACTED]	4/29/13	5,000

	<u>Defendant</u>	<u>Execution Date</u>	<u>Bond Amount</u>
87.	[REDACTED]	4/29/13	5,000
88.	[REDACTED]	5/9/13	86,500
89.	[REDACTED]	5/9/13	500
90.	[REDACTED]	5/9/13	500
91.	[REDACTED]	5/9/13	1,500
92.	[REDACTED]	5/10/13	50.00
93.	[REDACTED]	5/10/13	10,000
94.	[REDACTED]	5/10/13	500
95.	[REDACTED]	5/11/13	500
96.	[REDACTED]	5/11/13	500
97.	[REDACTED]	8/19/13	20,600
98.	[REDACTED]	8/23/13	15,000
99.	[REDACTED]	None	6,000

3. The conduct as described above, if true, is a violation of Sections 38a-660, 38a-660d, 38a-660e, 38a-769, 38a-815 and 38a-818 of the Connecticut General Statutes and constitutes cause for the suspension or revocation of her licenses and/or the imposition of fines pursuant to Sections 38a-2, 38a-660(a) and 38a-774 and 38a-817 of the Connecticut General Statutes.

COUNT X

1. Paragraph 1 of Count 1 is incorporated herein by reference as paragraph 1 of this Count, as though fully set forth herein.
2. The same report indicates that the Respondent brought the following (18) eighteen bond files to the auditors for review. However, they were not listed on her turn-in sheets:

	<u>Defendant</u>	<u>Execution Date</u>	<u>Bond Amount</u>
1.	[REDACTED]	12/11/12	35,000
2.	[REDACTED]	12/13/12	5,000
3.	[REDACTED]	12/13/12	100,000
4.	[REDACTED]	12/13/12	35,000
5.	[REDACTED]	12/13/12	10,000
6.	[REDACTED]	12/22/12	75,000
7.	[REDACTED]	1/18/13	10,000
8.	[REDACTED]	1/18/13	10,000
9.	[REDACTED]	1/18/13	50,000
10.	[REDACTED]	1/18/13	2,500
11.	[REDACTED]	1/18/13	2,500
12.	[REDACTED]	1/18/13	2,500
13.	[REDACTED]	3/13/13	5,000
14.	[REDACTED]	8/1/13	500
15.	[REDACTED]	8/4/13	1,500
16.	[REDACTED]	8/4/13	1,000
17.	[REDACTED]	8/18/13	75,000

Defendant

Execution Date

Bond Amount

8/18/13

15,000

3. During the examination, the auditors witnessed the Respondent creating premium payment receipts that were not present in the bail bond files at the time of the audit.
4. The conduct as described above, if true, is a violation of Sections 38a-660, 38a-660d(b), 38a-769, 38a-815 and 38a-818 of the Connecticut General Statutes and constitutes cause for the suspension or revocation of her licenses and/or the imposition of fines pursuant to Sections 38a-2, 38a-660(a) and 38a-774 and 38a-817 of the Connecticut General Statutes.

COUNT XI

1. Paragraph 1 of Count I is incorporated herein by reference as paragraph 1 of this Count, as though fully set forth herein.
2. The Respondent is advertising bail bond business under the name "Platinum Bail Bonds, LLC", a business that currently does not hold an insurance license authorizing it to execute or deliver undertakings of bail or bail bonds in Connecticut.
3. The conduct as described above, if true, is a violation of Sections 38a-660 and 38a-769 of the Connecticut General Statutes and constitutes cause for the suspension or revocation of her licenses and/or the imposition of fines pursuant to Sections 38a-2, 38a-660(a) and 38a-774 of the Connecticut General Statutes.

COUNT XII

1. Paragraph 1 of Count I is incorporated herein by reference as paragraph 1 of this Count, as though fully set forth herein.
2. Pursuant to Section 38a-660 of the Connecticut General Statutes, a person licensed as a surety bail bond agent shall pay to the Insurance Commissioner, before January 31st annually, a fee of \$450 to cover the cost of performing audits and examinations of the records maintained by surety bail bond agents.
3. The Respondent has failed to pay the annual \$450.00 assessments by the January 31, 2015 deadline for her individual surety bail bond license.
4. The conduct as described above, if true, is a violation of Sections 38a-660 and 38a-769 of the Connecticut General Statutes and constitutes cause for the suspension or revocation of her licenses and/or the imposition of fines pursuant to Sections 38a-2, 38a-660(a) and 38a-774 of the Connecticut General Statutes.

COUNT XIII

1. Paragraph 1 of Count I is incorporated herein by reference as paragraph 1 of this Count, as though fully set forth herein.

2. Information received in this office indicates that the Respondent executed the following bonds and (1) failed to remit premium payments totaling approximately \$8,231.25; and (2) failed to pay build-up funds, resulting in the termination of her surety appointment by her General Agent:

	<u>Defendant</u>	<u>Execution Date</u>	<u>Bond Amount</u>
1.	[REDACTED]	8/1/12	10,000
2.	[REDACTED]	8/24/12	50,000
3.	[REDACTED]	9/5/12	75,000
4.	[REDACTED]	9/26/12	25,000
5.	[REDACTED]	12/5/12	150,000
6.	[REDACTED]	5/7/13	50,000
7.	[REDACTED]	5/9/13	(2) 2,500
8.	[REDACTED]	5/9/13	500
9.	[REDACTED]	5/9/13	2,500
10.	[REDACTED]	5/9/13	1,000
11.	[REDACTED]	5/9/13	5,000
12.	[REDACTED]	5/9/13	25,000
13.	[REDACTED]	5/9/13	50,000
14.	[REDACTED]	5/9/13	1,500
15.	[REDACTED]	5/10/13	500
16.	[REDACTED]	5/10/13	10,000
17.	[REDACTED]	5/11/13	(3) 500

3. The conduct as described above, if true, is a violation of Sections 38a-660, 38a-660d, 38a-660f, 38a-712, 38a-769, 38a-815 and 38a-818 of the Connecticut General Statutes and constitutes cause for the suspension or revocation of her licenses and/or the imposition of a fine pursuant to Sections 38a-2, 38a-660l(a), 38a-774 and 38a-817 of the Connecticut General Statutes

COUNT XIV

1. Paragraph 1 of Count I is incorporated herein by reference as paragraph 1 of this Count, as though fully set forth herein.
2. Respondent executed the aforementioned \$150,000 bond for [REDACTED] cited in paragraph number 2 of count XIII, without the knowledge or consent of the surety company and the general agent. This placed an exorbitant amount of liability on the surety company and general agent.
3. The conduct as described above, if true, is a violation of Sections 38a-660, 38a-660d(a), 38a-769, 38a-815 and 38a-818 of the Connecticut General Statutes and constitutes cause for the suspension or revocation of her licenses and/or the imposition of a fine pursuant to Sections 38a-2, 38a-660l(a), 38a-774 and 38a-817 of the Connecticut General Statutes.

COUNT XV

1. Paragraph 1 of Count I is incorporated herein by reference as paragraph 1 of this Count, as though fully set forth herein.

2. Information received in this office indicates that the Respondent executed a \$20,000.00 bond on 8/19/13 on behalf of defendant [REDACTED]
3. Information received in this office indicates that the Respondent remitted a premium check for \$620.00 dated 10/1/13 to her general agent on the aforementioned bond for [REDACTED], and that such premium check remitted was not payable due to insufficient funds.
4. The conduct as described above, if true, is a violation of Sections 38a-660, 38a-660d, 38a-712, 38a-769, 38a-815 and 38a-818 of the Connecticut General Statutes and constitutes cause for the suspension or revocation of her licenses and/or the imposition of a fine pursuant to Sections 38a-2, 38a-660(a), 38a-774 and 38a-817 of the Connecticut General Statutes.

COUNT XVI

1. Paragraph 1 of Count I is incorporated herein by reference as paragraph 1 of this Count, as though fully set forth herein.
2. Information and exhibits received in this office indicates that on April 18, 2015 the Respondent was arrested and charged with assault in the third degree, in violation of C.G.S. sec. 53a-61 and reckless endangerment in the 1st degree, in violation of C.G.S. sec. 53a-63, which are both disqualifying offenses. The Respondent failed to notify the Department, in writing, within five days of Respondent's arrest.
3. The conduct as described above, if true, is a violation of Sections 38a-660, 38a-769, 38a-815 and 38a-818 of the Connecticut General Statutes and constitutes cause for the suspension or revocation of her licenses and/or the imposition of a fine pursuant to Sections 38a-2, 38a-660(a), 38a-774 and 38a-817 of the Connecticut General Statutes.

COUNT XVII

1. Paragraph 1 of Count I is incorporated herein by reference as paragraph 1 of this Count, as though fully set forth herein.
2. Information and exhibits received in this office indicates that the Respondent's surety appointment was terminated by her general agent effective 9/13/13, and the Respondent executed the following bonds without proper surety appointment:

<u>Defendant</u>	<u>Execution Date</u>	<u>Bond Amount</u>
[REDACTED]	9/13/13	5,000
[REDACTED]	9/14/13	5,000

3. The conduct as described above, if true, is a violation of Sections 38a-660, 38a-815 and 38a-818 of the Connecticut General Statutes and constitutes cause for the suspension or revocation of her licenses and/or the imposition of fines pursuant to Sections 38a-2, 38a-660(a), 38a-774 and 38a-817 of the Connecticut General Statutes.

COUNT XVIII

1. Paragraph 1 of Count I is incorporated herein by reference as paragraph 1 of this Count, as though fully set forth herein.
2. Information and exhibits received in this office indicates that the Respondent executed the following bonds and (1) entered into a premium financing agreement; (2) failed to collect the remaining premium balance due; and (3) failed to file a civil action for payments due (60) sixty days in arrears:

<u>Defendant</u>	<u>Execution Date</u>	<u>Bond Amount</u>
[REDACTED]	7/16/12	50,000
[REDACTED]	7/18/13	50,000
[REDACTED]	8/8/13	25,000
[REDACTED]	8/16/13	20,000
[REDACTED]	8/18/13	75,000, 15,000

3. Information and exhibits received in this office indicates that the Respondent executed the following bonds and (1) collected an initial premium that was less than the approved premium rate; (2) failed to maintain a premium financing arrangement for the remaining premium due; and (3) failed to collect the remaining premium balance due:

<u>Defendant</u>	<u>Execution Date</u>	<u>Bond Amount</u>
[REDACTED]	8/19/13	(2) 20,000

4. Information and exhibits received in this office indicates that the Respondent executed the following bond, and failed to maintain a premium receipt as proof that the approved premium rate was charged and collected:

<u>Defendant</u>	<u>Execution Date</u>	<u>Bond Amount</u>
[REDACTED]	8/21/13	10,000

5. The conduct as described above, if true, is a violation of Sections 38a-660, 38a-660b, 38a-660c, 38a-660d, 38a-815, 38a-818 and 38a-825 of the Connecticut General Statutes and constitutes cause for the suspension or revocation of her licenses and/or the imposition of fines pursuant to Sections 38a-2, 38a-660l(a), 38a-774 and 38a-817 of the Connecticut General Statutes.

COUNT XIX

1. Paragraph 1 of Count I is incorporated herein by reference as paragraph 1 of this Count, as though fully set forth herein.
2. The Respondent was subject to a semi-annual audit by her surety company, Accredited Surety & Casualty Co. Inc., and a report submitted to the Department indicates that the Respondent executed the following bonds:

<u>Defendant</u>	<u>Execution Date</u>	<u>Bond Amount</u>
[REDACTED]	1/18/13	50,000, 10,000
[REDACTED]	1/18/13	(3) 2,500
[REDACTED]	3/28/13	50,000
[REDACTED]	3/28/13	(2) 500
[REDACTED]	5/9/13	50,000, 25,000
[REDACTED]	5/9/13	5,000, (2) 2,500
[REDACTED]	5/9/13	1,000, 500

- The same report cited in paragraph 2 of this count indicates that the Respondent failed to maintain premium receipts as proof that the approved premium rate was charged and collected on the aforementioned bonds for [REDACTED] and the \$50,000 bond for [REDACTED].
- The same report cited in paragraph 2 of this count indicates that the Respondent (1) collected an initial premium less than the approved premium rate; (2) failed to maintain a premium financing arrangement for the remaining premium due; and (3) failed to collect the remaining premium balance due on the aforementioned \$50,000 bond for [REDACTED].
- The same report cited in paragraph 2 of this count indicates that the Respondent failed to charge the approved premium rate on the aforementioned \$25,000 bond for [REDACTED].
- The conduct as described above, if true, is a violation of Sections 38a-660, 38a-660b, 38a-660c, 38a-660d, 38a-815, 38a-818 and 38a-825 of the Connecticut General Statutes and constitutes cause for the suspension or revocation of her licenses and/or the imposition of fines pursuant to Sections 38a-2, 38a-660(a), 38a-774 and 38a-817 of the Connecticut General Statutes.

COUNT XX

- Paragraph 1 of Count I is incorporated herein by reference as paragraph 1 of this Count, as though fully set forth herein.
- The Respondent was subject to a second semi-annual audit by her surety company, Accredited Surety & Casualty Co. Inc., and a report submitted to the Department indicates that the Respondent executed the following bonds:

<u>Defendant</u>	<u>Execution Date</u>	<u>Bond Amount</u>
[REDACTED]	11/22/13	25,000, 5,000
[REDACTED]	12/12/13	10,000
[REDACTED]	12/13/13	100,000

- The same report cited in paragraph 2 of this count indicates that the Respondent failed to maintain premium receipts as proof that the approved premium rate was charged and collected on the aforementioned bond for [REDACTED].
- The same report cited in paragraph 2 of this count indicates that the Respondent (1) failed to maintain a signed and dated bail bond application; (2) failed to maintain an initial premium payment receipt;

(3) entered into a premium financing arrangement and failed to collect the remaining premium balance due; and (4) failed to file a civil action for payments due (60) sixty days in arrears on the aforementioned bond for [REDACTED]

5. The same report cited in paragraph 2 of this count indicates that the Respondent (1) entered into a premium financing arrangement; (2) failed to collect the remaining premium balance due; and (3) failed to file a civil action for payments due (60) sixty days in arrears on the aforementioned bond for [REDACTED]
6. The conduct as described above, if true, is a violation of Sections 38a-660, 38a-660b, 38a-660c, 38a-660d, 38a-660e, 38a-815, 38a-818 and 38a-825 of the Connecticut General Statutes and constitutes cause for the suspension or revocation of her licenses and/or the imposition of fines pursuant to Sections 38a-2, 38a-660(a), 38a-774 and 38a-817 of the Connecticut General Statutes.

COUNT XXI

1. Paragraph 1 of Count I is incorporated herein by reference as paragraph 1 of this Count, as though fully set forth herein.
2. The Department records reflect that the Respondent failed to file monthly certifications for the months of September and November 2012.
3. The Department records reflect that the Respondent failed to file monthly certifications for the months of January through October 2013, and December 2013.
4. The Department records reflect that the Respondent failed to file monthly certifications for the months of January through March 2014, and June through December 2014.
5. The Department records reflect that the Respondent failed to file monthly certifications for the months of January through March 2015.
6. The conduct as described above, if true, is a violation of Sections 38a-660, 38a-660b, 38a-815 and 38a-818 of the Connecticut General Statutes and constitutes cause for the suspension or revocation of her licenses and/or the imposition of fines pursuant to Sections 38a-2, 38a-660(a), 38a-774 and 38a-817 of the Connecticut General Statutes.

COUNT XXII

1. Paragraph 1 of Count I is incorporated herein by reference as paragraph 1 of this Count, as though fully set forth herein.
2. The Department records reflect that the Respondent certified executing sixty-seven (67) bail bonds in 2012. However, Respondent's records reflect one hundred and eleven (111) bail bonds executed in 2012.

3. The Department records reflect that the Respondent certified executing ten (10) bail bonds in 2013. However, Respondent's records reflect one hundred nineteen (119) bail bonds executed in 2013.
4. The Department records reflect that the Respondent certified executing fifteen (15) bail bonds in 2014. However, Respondent's records reflect seventy (70) bail bonds executed in 2013.
5. The conduct as described above, if true, is a violation of Sections 38a-660, 38a-660b, 38a-769, 38a-815 and 38a-818 of the Connecticut General Statutes and constitutes cause for the suspension or revocation of her licenses and/or the imposition of fines pursuant to Sections 38a-2, 38a-660l(a), 38a-774 and 38a-817 of the Connecticut General Statutes.

COUNT XXIII

1. Paragraph 1 of Count I is incorporated herein by reference as paragraph 1 of this Count, as though fully set forth herein.
2. The Department records reflect that the Respondent certified to the Department that she executed the following bonds. However, her records reflect different number of bonds executed as follows:

<u>Month</u>	<u>Certified to State</u>	<u>Agent's Record</u>
June 2012	7	16
August 2012	16	19
December 2012	18	23

3. The conduct as described above, if true, is a violation of Sections 38a-660, 38a-660b, 38a-769, 38a-815 and 38a-818 of the Connecticut General Statutes and constitutes cause for the suspension or revocation of her licenses and/or the imposition of fines pursuant to Sections 38a-2, 38a-660l(a), 38a-774 and 38a-817 of the Connecticut General Statutes.

COUNT XXIV

1. Paragraph 1 of Count I is incorporated herein by reference as paragraph 1 of this Count, as though fully set forth herein.
2. On or about July 10, 2015, the Department sent a notice, by certified mail, return receipt requested, No. 7014 3490 0001 1400 0219, to the Respondent's mailing address of record requesting that she provide the Department all files and records relative to the aforementioned bonds, within five (5) days of receipt of such notice in order to show compliance with the law with regard to the allegations cited in Counts I through XXIII of this Complaint.
3. A return receipt received in this office indicates that the notice was left at the Respondent's address of record by the United States Postal Service on July 13, 2015.
4. Respondent has failed to respond to the Department regarding the allegations against her.

5. The conduct as described above, if true, is a violation of Sections 38a-16, 38a-660, 38a-769, 38a-815 and 38a-818 of the Connecticut General Statutes and constitutes cause for the suspension or revocation of insurance licenses issued by the Department and/or for the imposition of fines pursuant to Sections 38-2, 38a-660l(a), 38a-774 and 38a-817 of the Connecticut General Statutes.

NOTICE

Notice is hereby given to you, Andrea V. Brown, Respondent herein, that the 8th day of October, 2015 at 10:00 a.m. is hereby fixed as the time where a public hearing will be held in the offices of the Insurance Department, 153 Market Street, 6th Floor, Hartford, Connecticut on the charges set forth in this Complaint, at which time and place you will have the right to appear before the Commissioner, or a duly designated hearing officer, to show cause why the suspension or revocation of your insurance license and/or fines should not be imposed.

The legal authority and jurisdiction for the hearing in this matter are contained in sections 38a-8, 38a-16, 38a-660, 38a-769, 38a-774 and 38a-817 of the General Statutes and in the Uniform Administrative Procedure Act, section 4-166 *et seq.* of the General Statutes.

Pursuant to section 38a-8-61 of the Regulations of Connecticut State Agencies, you are required to file an answer within the Insurance Department within twenty (20) days of service of this Complaint specifically admitting or denying the allegations or charges set out in the Complaint. Factual allegations not specifically denied shall be deemed to be admitted.

Failure to file said answer as required by Section 38a-8-61, R.C.S.A., or failure to appear at the time and place fixed for hearing will permit the Commissioner, at her discretion, to note such failure upon the record and render a decision by default.

If you as the Respondent desire to waive hearing on the allegations of fact set forth in the Complaint and not contest the facts alleged, please file with the Insurance Department an answer to this complaint on or before the twentieth (20th) day after service of it upon you, consisting of a statement that you as the Respondent in this matter admit all of the material allegations of fact charged in the Complaint to be true.

The Insurance Department does not discriminate on the basis of disability in admission to, access to, or operation of its programs, services or activities, in accordance with Title II of the Americans with Disabilities Act of 1990. Individuals who require auxiliary aids for effective communication or other accommodation are invited to make their needs and preferences known to Patricia Tiberio, ADA Coordinator, at the Insurance Department - Tel: (860) 297-3800.

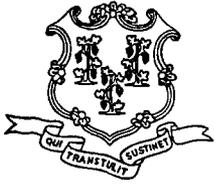
All correspondence concerning this matter should be sent to the Insurance Department, State of Connecticut, P. O. Box 816, Hartford, CT 06142-0816, attention: Anthony Caporale, Counsel.

Dated at Hartford, Connecticut, this 3rd day of September, 2015.

Katharine L. Wade,
Insurance Commissioner

By: 

Anthony Caporale
Counsel
(860) 297-3981



STATE OF CONNECTICUT
INSURANCE DEPARTMENT

-----X
IN THE MATTER OF:
ANDREA V. BROWN
Respondent
Docket No. FC 15-102
-----X

ORDER FOR DEFAULT JUDGMENT AND ORDER OF REVOCATION

The Insurance Commissioner, hereinafter referred to as Commissioner, is charged with the administration and enforcement of the insurance laws and regulations that pertain to licensees of the Insurance Department pursuant to Connecticut General Statutes Section 38a-8.

Section 38a-774 of the Connecticut General Statutes provides in part that:

The commissioner, after reasonable notice to and hearing of any holder of a license issued by the commissioner, may suspend or revoke the license for cause shown. In addition to or in lieu of suspension or revocation, the commissioner may impose a fine not to exceed five thousand dollars.

The Commissioner has conducted an investigation of the activities of the above captioned Respondent and as a result of that investigation issued a Complaint dated September 3, 2015, a copy of which is attached hereto as Exhibit A, alleging cause to suspend or revoke licenses issued by the Commissioner, or in addition to or in lieu thereof impose a fine.

Section 38a-8-61 of the Regulations of Connecticut State Agencies provides that:

The respondent in any enforcement proceeding shall file an answer with the Commissioner within twenty (20) days of service of the notice of hearing specifically admitting or denying the allegations or charges set out in the notice. Factual allegations not specifically denied shall be deemed to be admitted.

Section 38a-8-62 of the Regulations of Connecticut State Agencies provides that:

In any proceeding when the Respondent fails to file an answer as required by Section 38a-8-61 of these Regulations or fails to appear at a duly noticed hearing,

the Commissioner may, in his discretion, note such failure upon the record and render a decision by default.

IN ACCORDANCE WITH THE FOREGOING:

I FIND, in light of the foregoing, that a Complaint and Notice of Hearing was sent on or about September 4, 2015 to the Respondent, by regular first-class mail and by certified mail, Number 7014 3490 0001 1400 0301, with the proper postage as follows:

Andrea V. Brown
[REDACTED]
[REDACTED]

Evidence of mailing of Certified Mail, Article Number 7014 3490 0001 1400 0301, sent to Respondent at [REDACTED] on April 1, 2015 is attached as Exhibit B. Notice of Certified Mail, Article Number 7014 3490 0001 1400 0301 was left for the Respondent on September 8, 2015, but the item remained unclaimed, see Exhibit C. The Complaint and Notice of Hearing sent by first-class mail to the Respondent was not returned to the Department.

As of this date, the Department has not received any answer to the Complaint from the Respondent.

The address stated above is the address filed with this Department by the Respondent, who is required by law to report any change of address within thirty days. From the date of this order, the Complaint and Notice of Hearing was mailed to the Respondent 40 days ago. Accordingly, I find that the Respondent received service and reasonable notice of the Complaint in accordance with the Regulations of Connecticut State Agencies, Sections 38a-8-18 and 38a-8-59 et seq.

I FURTHER FIND that the Respondent did not file an answer within the time period required in accordance with the Regulations of Connecticut State Agencies, Section 38a-8-61, nor did she appear at a hearing scheduled for October 8, 2015. Accordingly, all of the allegations as set forth in the Complaint, attached hereto, are hereby deemed admitted.

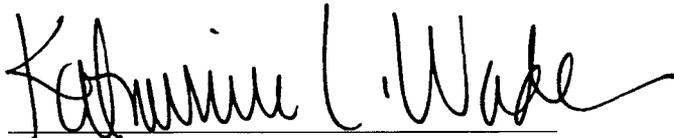
IT IS HEREBY ORDERED, in accordance with the above findings and pursuant to Section 38a-8-61 of the Regulations of Connecticut State Agencies, that:

1. A decision by default enters against the Respondent, Andrea V. Brown.
2. That all licenses issued to the Respondent pursuant to Sections 38a-660 and 38a-769 of the Connecticut General Statutes, are hereby revoked and the Hearing originally scheduled for October 8, 2015 is cancelled.

3. That pursuant to Section 38a-8-63 of the Regulations of Connecticut State Agencies:

A respondent may move to reopen any decision rendered by default within sixty (60) days of the entry thereof. The motion shall be in writing and shall state the reasons for the failure of the respondent to answer or appear. If a default was entered for failure of the respondent to file an answer, the respondent shall submit said answer with the motion to reopen. If good cause appears for the failure of the respondent to answer or appear, the Commissioner may grant said motion and shall schedule the hearing at the earliest date convenient to the Commissioner.

So ordered this 14 day of October 2015

A handwritten signature in black ink, reading "Katharine L. Wade". The signature is written in a cursive style with a long horizontal flourish extending to the right.

Katharine L. Wade
Katharine L. Wade
Insurance Commissioner