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FILED
OCT 23 2020
Department of Insurance
State of Idaho

BEFORE THE DIRECTOR OF THE DEPARTMENT OF INSURANCE

STATE OF IDAHO

IDAHO DEPARTMENT OF INSURANCE

Complainant,

vs.

SCOTT ORSON PACKHAM, an individual holding Idaho Resident Producer License No. 13001 and Idaho Resident Surplus Lines Broker License No. 13001; JULIENE MORALES, an unlicensed individual; and PACKHAM INSURANCE AGENCY, INC, an Idaho corporation holding Resident Producer Agency License No. 2194

Docket No. 18-3778-20

**HEARING OFFICER'S FINDINGS
OF FACT, CONCLUSIONS OF LAW
AND PRELIMINARY ORDER**

This matter came before the hearing officer on an evidentiary hearing on August 26, 2020. Michael Witry, Deputy Attorney General, appeared on behalf of the Department of Insurance. Scott Orson Packham appeared representing himself.

The Department in a Verified Complaint entailing sixteen counts raised allegations that Mr. Packham committed numerous violations of Idaho Code Idaho Code §§ 41- 1016(1)(d), 41-1016(h) and 41-1323(1). A count against Ms. Morales concerned an alleged violation of Idaho Code § 41-117A. Prior to the hearing a default judgement was entered against Ms. Morales.

FINDINGS OF FACT

1. Mr. Packham is licensed under the Idaho Department of Insurance, Resident Producer License No. 133001.
2. The Packham Insurance Agency (herein after PIA) is licensed as Resident Producer Agency License No. 2194 and was operated by Mr. Packham.
3. As part of his agency operations PIA maintained and used three bank accounts for agency operations all located with the same financial institution. Two as fiduciary accounts, one sweep account, one for trust funds. His third agency account was for business operations. Hrg Trans. p. 17/11 4-20 (hereinafter page/line); Exhibit 1.
4. The sweep account was used for the insurance carrier sweep of consumer premiums. The trust account was used for larger commercial policies and their corresponding premiums. Hrg Trans. 17/21-25; 18/1-2.
5. During a time period running from July of 2017 until late September 2019 the account accumulated 160 separate charges for non-sufficient fund fees. Hrg Trans. 19/ 21-25; 20/1-4; Exhibit 2.
6. The sweep account was ultimately closed with a negative balance. Hrg Trans. 22/10-12.
7. An audit undertaken by the Department of Mr. Packham's cash receipt books for the time period running from January 2018 until February 2019 revealed a difference in amounts collected from consumers compared to funds deposited in the fiduciary accounts of approximately \$21,700.00. Hrg Trans. 22/16-25; 23/1-25; 24/1-18; 26/4-15; Exhibit 3.

8. In November of 2018 PIA received premium payments totaling \$800.00 from a consumer (P.P.). Hrg Trans 27/12-19; 28/1-6; 28/16-18; Exhibit 4.
9. These premium payments were to be used for the purchase of two policies for the consumer. Hrg Trans 28/21-25; 29/1-7.
10. Deposits into the PIA sweep account reflected a different amount, totaling less than that provided by the consumer. Hrg Trans 33/19-23; 34/10-13; Exhibits 6 and 7.
11. The consumer was ultimately provided only one of the two intended policies. Hrg Trans 35/4-10.
12. The consumer never received a refund of the money paid for the second policy. Hrg Trans 35/11-12.
13. In June of 2019 a consumer (J.A.) of PIA paid cash for a policy premium payment. Exhibit 8.
14. The trust fund accounts failed to show a deposit of the amount of the premium payment. Hrg Trans. 40/ 23-25; 41/1-2; Exhibit 10.
15. No payment of the premium was ultimately made to the insurance carrier. Hrg Trans. 39/ 11-18; Exhibit 9.
16. No refund was provided to the consumer. Hrg Trans. 43/ 3-5.
17. In March of 2019 a consumer (D.C.) of PIA made payment for a policy premium. Hrg Trans. 35/ 7-15; Exhibit 12.
18. The money paid by the consumer was not deposited into PIA trust fund accounts. Hrg Trans. 45/16-18, 25; 46/1-16; 47/20-22; Exhibit 13.
19. The insurance carrier was not provided the premium payments. Hrg Trans. 46/ 17-24; 47/23-25; Exhibit 14.

20. The consumer subsequently learned that he had not in fact had an insurance policy in effect since 2017. Hrg Trans. 49/9-16; Exhibit 15.
21. In April 2018 policy premium payments were made to PIA by a consumer (D.O.) for two policies, a commercial umbrella policy and a tailored protection policy. Hrg Trans. 50/ 12-20.
22. The proceeds paid by the consumer were deposited into the PIA trust fund account. Hrg Trans. 54/ 7-17; 55/ 16-20; Exhibit 19.
23. Payment was made to the insurance company for only one of the two policies. Hrg Trans. 56/ 21-25; 57/1-8; Exhibit 20.
24. The second policy was ultimately cancelled. Hrg Trans. 57/ 14-25; 58/1-8; Exhibit 21.
25. No refund for the unissued policy was provided to the consumer. Hrg Trans. 58/ 9-11.
26. No action was undertaken by PIA to have the second policy issued. Hrg Trans. 59/ 7-11.
27. In May of 2018 a consumer (K.C.) of PIA provided payment for an insurance policy premium. Hrg Trans. 62/ 12-16; Exhibit 23.
28. This payment was not made to the insurance carrier. Hrg Trans. 63/ 4-8; Exhibit 24.
29. The consumer's policy was cancelled. Hrg Trans. 64/ 11-15; Exhibit 24.
30. In June of 2019 a consumer (D.M.) paid cash to PIA for an insurance policy premium. Hrg Trans. 67/ 21-25; 68/ 1-6 Exhibit 26.
31. PIA trust account records failed to indicate that the cash payment was deposited into the trust fund account. Hrg Trans. 68/ 7-25; 69/ 1-2; Exhibit 10.
32. The insurance policy was cancelled. Hrg Trans. 66/ 18-19; Exhibit 25.
33. No refund was provided to the consumer. Hrg Trans. 69/ 15-17.
34. In March of 2019 a consumer (C.C.) provided a payment to PIA for an insurance policy premium. Hrg Trans. 71/ 17-25; 72/ 6-8, 20-24; Exhibit 28.

35. This premium payment was deposited into the PIA trust sweep account. Hrg Trans. 73/ 13-21; Exhibit 14.
36. The premium payment was not paid to the insurance carrier. Hrg Trans. 73/ 25; 74/ 1-2.
37. The policy was subsequently cancelled. Hrg Trans. 76/ 6-10; Exhibit 30.
38. No refund was ever provided to the consumer. Hrg Trans. 76/ 15-17; Exhibit 30.
39. In December of 2018 a consumer (T.I.) of PIA provided payment for a policy premium. Hrg Trans. 80/ 17-24; 81/ 12-21; 82/ 1-16; Exhibit 31; Exhibit 32.
40. The premium was deposited into the PIA trust sweep account. Hrg Trans. 82/ 22-25; 83/ 1, 12-17; Exhibit 33.
41. The money was not paid to the insurance carrier. Hrg Trans. 83/ 18-20; Exhibit 33.
42. In June of 2019 a consumer (S.G.) provided a payment to PIA for an insurance policy premium. Hrg Trans. 84/ 2-5; 85/ 2-4; Exhibit 34.
43. This payment amount was deposited into the PIA trust sweep account. Hrg Trans. 86/ 14-17; Exhibit 11.
44. The policy for this consumer was never written. Hrg Trans. 86/ 18-22; 87/ 20-25; 88/ 1-2; Exhibit 36.
45. PIA also provided to the consumer an insurance identification card stating that a policy had been issued. Hrg Trans. 85/ 10-18; 86/ 3-8; Exhibit 35.
46. No refund was ever provided to the consumer. Hrg Trans. 88/ 3-5.
47. In May of 2019 a consumer (B.S.) provided payment to PIA of an amount for an insurance policy premium. Hrg Trans. 90/ 11-15; Exhibit 38.
48. This amount was deposited into the PIA trust sweep account. Id.

49. These proceeds were never paid to the insurance carrier. Hrg Trans. 91/ 14-20; Exhibit 39.
50. The policy was cancelled. Hrg Trans. 91/ 21-24; Exhibit 39.
51. No refund was ever provided to the consumer. Hrg Trans 91/ 25; 92/ 1-2.
52. In May of 2019 a consumer (A/Z) provided payment for an insurance policy premium. Hrg Trans. 96/ 10-14.
53. The premium payment amount was not provided to the insurance carrier. Hrg Trans. 96/ 15-21; Exhibit 41.
55. The requested policy was not issued. Exhibit 40.
56. The premium amount was refunded to the consumer. Hrg Trans. 96/ 22-24.

CONCLUSIONS OF LAW

57. The provisions of Idaho Code § 41-1016(1) state that the Director may impose an administrative penalty for certain enumerated activities. Subpart (1)(d) provides that a violation exists for agent actions of:
- (d) Improperly withholding, misappropriating or converting any moneys or properties received in the course of doing insurance business.
58. Subpart (1)(h) of Idaho Code § 41-1016(1) provides that a violation exists if a agent uses:
- Fraudulent, coercive or dishonest practices, or demonstrating incompetence, untrustworthiness or financial irresponsibility, or being a source of injury and loss to the public or others, in the conduct of business in this state or elsewhere.
59. The provisions of Idaho Code § 41-1323 provide that

(1) No person shall wilfully collect any sum as premium or charge for insurance, which insurance is not then provided or is not in due course to be provided (subject to acceptance of the risk by the insurer) by an insurance policy issued by an insurer as authorized by this code. (Title 41).

60. Evidence in this matter clearly establishes that PIA engaged in a pattern of activity where premium payments made by consumers were unaccounted for, diverted, and/or not applied to the consumers' respective accounts. On multiple occasions PIA after taking money from consumers failed to deposit these proceeds into either the appropriate sweep or general agency trust fund accounts. The use of the proceeds unaccounted for is unknown. As a result insurance carriers were unable when sweeping the PIA trust fund account to apply these proceeds to the consumer's policies.

61. Additionally PIA failed to keep or make proper entries regarding consumer policy renewal and termination dates which as a result caused consumers to pay premiums for policies already cancelled.

62. Further actions show the issuance of a false insurance issuance identifications cards for at least one consumer who was lead to believe a policy was in place but in actually was nonexistent.

63. Mr. Packham raised little defense to the activities other than that these errors and financial misdealings originated as a result of the actions of his employee. This employee, an unlicensed individual, took over a substantial amount of agency work during a time period when Mr. Packham was involved in personal non business matters. Mr. Packham contends that unknown to him at the time, this employee began to engage in a pattern of activities that entailed general deception escalating to embezzlement of consumer funds, issuance of false paperwork and forgery.

64. Mr. Packham noted his growing suspicions of the employee and did at certain times attempt to reconcile trust account activities and the growing negative balance which was the result in part from delinquent fees and account overcharges. He ultimately, however, save for some instances of account reconciliation, did little to directly address the situation or remedy the harm suffered by a number of his consumers.

65. Numerous consumer complaints were filed against Mr. Packham, a number of which resulted in several of the specific counts brought in this matter.

66. The fiduciary standard to which an agent is held under Idaho law requires that those funds received be handled and treated in a manner which ensures proper application of the monies for the insured. The evidence is clear that on numerous occasions proceeds advanced to PIA were misappropriated or otherwise unaccounted for. The multiple payments identified in this matter were not properly treated as fiduciary funds require.

67. The fiduciary standard to which an agent is held also requires that Mr. Packham should have monitored the activities of his employee in addition to the ongoing activities of his trust fund accounts.

68. Mr. Packham was certainly aware that trust account deficiencies were occurring. While he undertook some efforts the evidence is insufficient to lead to a conclusion that Mr. Packham did even remedial work to ascertain the status of premium payment transfers (sweep account activities) and the ultimate reason for the continually growing negative balance in his consumer trust accounts. Multiple fees imposed by the financial institution, many for insufficient funds should have given obvious reasons for a review and audit. The length of time involved also should have indicated to at least some degree the reasons behind the accounting shortfalls. These

matters did not entail one or two instances of potential accounting or bank errors but instead repeated negative balance activity.

69. This is combined by a basic review and comparison of proceeds flowing through the agency's books during the subject time period and the difference between amounts collected then paid to the carriers in the account sweeps or deposited in the non sweep account. Even a cursory examination leads to the obvious question of what was happening to consumer funds such that a monthly shortfall existed. Even though the suspicions of Mr. Packham may have been slow to manifest, it does not justify or excuse the continued course of ignoring the problem. The circumstances of this case do not involve just a single instance of money being diverted or sophisticated methods employed to hide misconduct. The repeated inability of carriers to successfully access and receive policy premiums supposedly deposited into a trust sweep account should have clearly raised alarms as to more than just potential improper bank fee overcharges.

70. Under Idaho Code § 41-1007(2)(b)(2) Mr. Packham was the "individual responsible" for PIA's compliance with the insurance laws and rules of Idaho. The activities of the entity and in turn that of the employees of the entity were the responsibility of Mr. Packham.

71. A pattern exists here where the action or failure to act, represents irresponsibility and in turn the improper use of the subject funds. This is further compounded by the failure in many instances of a policy to be issued. Multiple policies for which Mr. Packham and PIA acted as broker were canceled or not renewed as a result of the subject activities. The multiple counts in this matter each establish instances of harm to a consumer.

72. Mr. Packham has not raised a substantive defense which would excuse the violations which occurred.

73. The concern of the Department regarding the public safety involved with an insurance producer, is that this individual and the agency in which they operate is placed in a position of trust with potential consumers.

74. Mr. Packham's failure to adhere to his fiduciary duties and the statutory requirements when handling consumer funds warrants the imposition of sanctions.

75. Mr. Packham failed to properly conduct regular audits or reconciliations of his trust accounts showing financial irresponsibility a violation of Idaho Code §§ 41-1016(1)(h).

76. The evidence also establishes that Mr. Packham received over the subject time period of January 2018 through February 2018 payments from consumers greater than that reflected by the deposits into his trust accounts, this difference in the amounts being unaccounted for. These proceeds were thereafter withheld, misappropriated or converted, a violation of Idaho Code § 41-1016(1)(d).

77. In the majority of counts brought in this action, the Department seeks to impose multiple violations as regards each identified consumer, for a combination of violations of Idaho Code § 41-1016(1)(d),(improperly withholding, misappropriating or converting premium payments); 1(h) (demonstrating incompetence, untrustworthiness or financial irresponsibility, or being a source of injury and loss...) and Idaho Code § 41-1323 (the willful collection of any sum as premium or charge for insurance, which insurance is not then provided).

78. The actions of Mr. Packham as regards the specific multiple consumer improprieties represent violations of Idaho Code §§ 41-1016(1)(d), (1)(h) and 41-1323.

PRELIMINARY ORDER

It is hereby ordered that Scott Orson Packham pay the following administrative penalties; for improperly misappropriating or converting moneys received in the course of doing insurance business, which demonstrates untrustworthiness or financial irresponsibility in violation of Idaho Code § 41-1016(1)(d) and (h); and the further violation of Idaho Code Section § 41-1323, the sum of Dollars (\$ 500.00) for each incident which total thirty one (31); for a total administrative penalty in the amount of Fifteen Thousand Five Hundred Dollars (\$ 15,500.00) and that Scott Orson Packham's Resident Producer License No. 13301 and the Idaho resident Producer Agency License No. 2194 be REVOKED.

NOTIFICATION OF RIGHTS

This is a preliminary order of the Hearing Officer. It can and will become final without further action of the Department of Insurance unless any party petitions for reconsideration before the Hearing Officer or appeals to the Director for the Department of Insurance (or the designee of the Director). Any party may file a motion for reconsideration of this preliminary order with the Hearing Officer within fourteen (14) days of the service date of this order. The Hearing Officer will dispose of the petition for reconsideration within twenty-one (21) days of its receipt, or the petition will be considered denied by operation of law. See Idaho Code §67-5243(3).

Within fourteen (14) days after (a) the service date of this preliminary order, (b) the service date of the denial of a petition for reconsideration of this preliminary order, or (c) the failure within twenty-one (21) days to grant or deny a petition for reconsideration of this preliminary order, any party may in writing appeal or take exception to any part of the

preliminary order and file briefs in support of the party's position on any issue in the proceeding to the Director of the Department of Insurance (or the designee of the Director.) Otherwise, this preliminary order will become a final order of the Department of Insurance.

If any party appeals or takes exception to this preliminary order, opposing parties shall have twenty-one (21) days to respond to any party's appeal within the Department of Insurance. Written briefs in support of or taking exception to the preliminary order shall be filed with the Director of the Department of Insurance (or the designee of the Director). The Director may review the preliminary order on his own motion.

If the Director of the Department of Insurance (or his designee) grants a petition to review the preliminary order, the Director (or his designee) will allow all parties an opportunity to file briefs in support of or taking exception to the preliminary order and may schedule oral argument in the matter before issuing a final order. The Director (or his designee) will issue a final order within fifty-six (56) days of receipt of the written briefs or oral argument, whichever is later, unless waived by the parties for good cause shown. The Director (or his designee) may remand the matter for further evidentiary hearings if further factual development of the record is necessary before issuing a final order.

Pursuant to Idaho Code §§ 67-5270 and 67-5272, if this preliminary order becomes final, any party aggrieved by the final order or orders previously issued in this case may appeal the final order and all previously issued orders in this case to district court by filing a petition in the district court of the county in which: (1) the hearing was held, (2) the final agency action was taken, (3) the party seeking review of the order resides, or operates its principal place of business in Idaho, or (4) the real property or personal property that was the subject of the Department's action is located.

This appeal must be filed within twenty-eight (28) days of this preliminary order becoming final. See Idaho Code § 67-5273. The filing of an appeal to district court does not itself stay the effectiveness or enforcement of the order under appeal.

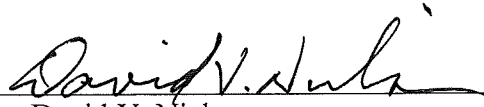
DATED this 21st day of October, 2020.

By: David V. Nielsen
David V. Nielsen
Hearing Officer

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on this 21st day of October, 2020, I served a true and correct copy of the foregoing by delivering the same to each of the following party, by the method indicated below, addressed as follows:

| | |
|--|---|
| Michael Witry Deputy Attorney General for Idaho Department of Insurance 700 W. State Street, 3 rd Floor P O Box 83720 Boise, ID 83720-0043 | <input checked="" type="checkbox"/> U.S. Mail <input type="checkbox"/> Hand-Delivered <input type="checkbox"/> Overnight mail <input type="checkbox"/> Facsimile |
| Scott Orson Packham Packham Insurance Agency, Inc. P O Box 39 Blackfoot, ID 83221 | <input checked="" type="checkbox"/> U.S. Mail <input type="checkbox"/> Hand-Delivered <input type="checkbox"/> Overnight mail <input type="checkbox"/> Facsimile |



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Agency License No. 2194

Docket No. 18-3778-20

**PRELIMINARY ORDER
CORRECTION
NUNC PRO TUNC**

A Preliminary Order being issued in this matter on October 21, 2020, and it having come to the attention of the Hearing Officer that an erratum existed in the language of the Preliminary Order, a corrected version of the Preliminary Order is now issued. The erratum consists of the absence of the type script written dollar amount before the numeral expression of the dollar amount penalty imposed for the subject violations. This correction does not impact the ultimate penalty calculation imposed or license revocation. This correction shall not affect or otherwise modify the time for a petition for reconsideration or appeal of the original dated Preliminary Order.

The corrected Preliminary Order is as follows:

PRELIMINARY ORDER

It is hereby ordered that Scott Orson Packham pay the following administrative penalties; for improperly misappropriating or converting moneys received in the course of doing insurance business, which demonstrates untrustworthiness or financial irresponsibility in violation of Idaho Code § 41-1016(1)(d) and (h); and the further violation of Idaho Code Section § 41-1323, the sum of Five Hundred Dollars (\$ 500.00) for each incident which total thirty one (31); for a total administrative penalty in the amount of Fifteen Thousand Five Hundred Dollars (\$ 15,500.00) and that Scott Orson Packham's Resident Producer License No. 13301 and the Idaho resident Producer Agency License No. 2194 be REVOKED.

DATED this 27th day of October, 2020.

By: David V. Nielsen
David V. Nielsen
Hearing Officer

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on this 27th day of October, 2020, I served a true and correct copy of the foregoing by delivering the same to each of the following party, by the method indicated below, addressed as follows:

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| Scott Orson Packham Packham Insurance Agency, Inc. P O Box 39 Blackfoot, ID 83221 | <input checked="" type="checkbox"/> U.S. Mail <input type="checkbox"/> Hand-Delivered <input type="checkbox"/> Overnight mail <input type="checkbox"/> Facsimile |

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BEFORE THE DIRECTOR OF THE DEPARTMENT OF INSURANCE

STATE OF IDAHO

IDAHO DEPARTMENT OF INSURANCE

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Idaho corporation holding Resident Producer
Agency License No. 2194

Docket No. 18-3778-20

**SECOND PRELIMINARY ORDER
CORRECTION
NUNC PRO TUNC**

A Preliminary Order being issued in this matter on October 21, 2020, and it having come to the attention of the Hearing Officer that an erratum existed in the language of the corrected Preliminary Order, this second corrected version of the Preliminary Order is now issued. The erratum consists of an error in the designation of the Resident Producer license number of Mr. Packham as Number 13301, which should have been listed instead as Number 13001. This correction shall not affect or otherwise modify the time for a petition for reconsideration or appeal of the original dated Preliminary Order.

The corrected Preliminary Order is as follows:

PRELIMINARY ORDER

It is hereby ordered that Scott Orson Packham pay the following administrative penalties; for improperly misappropriating or converting moneys received in the course of doing insurance business, which demonstrates untrustworthiness or financial irresponsibility in violation of Idaho Code § 41-1016(1)(d) and (h); and the further violation of Idaho Code Section § 41-1323, the sum of Five Hundred Dollars (\$ 500.00) for each incident which total thirty one (31); for a total administrative penalty in the amount of Fifteen Thousand Five Hundred Dollars (\$ 15,500.00) and that Scott Orson Packham's Resident Producer License No. 13001 and the Idaho Resident Producer Agency License No. 2194 be REVOKED.

DATED this 4th day of November, 2020.

By: David V. Nielsen
David V. Nielsen
Hearing Officer

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on this 4th day of November, 2020, I served a true and correct copy of the foregoing by delivering the same to each of the following party, by the method indicated below, addressed as follows:

Michael Witry
Deputy Attorney General for Idaho
Department of Insurance
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Scott Orson Packham
Packham Insurance Agency, Inc.
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☒ U.S. Mail
☐ Hand-Delivered
☐ Overnight mail
☐ Facsimile

David V. Nielsen
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