

**BEFORE THE COMMISSIONER OF INSURANCE  
OF THE STATE OF KANSAS**

**In the Matter of the Kansas Resident        )**  
**Insurance Producer's License of            )**  
**DAN BROUGH                                        )**  
**NPN # 19966232                                 )**

**Docket No. 118716**

**SUMMARY ORDER OF REVOCATION**

(Pursuant to K.S.A. 40-4909 and K.S.A. 77-501 *et seq.*)

Pursuant to the authority granted to the Commissioner of Insurance ("Commissioner") by K.S.A. 40-4909 and K.S.A. 77-501 *et seq.*, the Commissioner hereby **REVOKES** the Kansas resident insurance producer's license of **DAN BROUGH** ("Respondent"). This Summary Order shall become effective as a Final Order, without further notice, upon the expiration of the fifteen (15) day period if no request for a hearing is made.

**Findings of Fact**

1. Respondent was licensed as a Kansas nonresident insurance producer on July 8, 2021, and expired June 20, 2025.

2. Respondent's address of record on file with the Kansas Department of Insurance ("Department") is [REDACTED], Kansas City, KS 66112.

3. On or about August 21, 2024, the Department was notified by Country Mutual Insurance Company ("Country Mutual") that they had terminated their business relationship with the Respondent for cause based on allegations that the Respondent had altered documentation and submitted it for purposes of obtaining coverage and payment of a claim at a time when a policy was not active. The termination occurred on July 24, 2024.

4. On February 11, 2025, the Department mailed an inquiry letter to the Respondent at this address of record on file requesting a written explanation for the termination matter as well as requesting any data, documents, records or other pertinent information. The inquiry instructed

the Respondent to respond within fifteen (15) business days from the state of the letter and that a failure to respond may result in action against the license. Respondent failed to respond.

5. On April 28, 2025, the Department sent a late notice inquiry to the Respondent to the e-mail address of record on file with the Department again requesting the written explanation referenced in paragraph 4. This inquiry instructed the Respondent that a response was required within five (5) business days and again, that a failure to respond to the inquiry may result in administrative action, including revocation of the license. Respondent failed to respond.

6. Specially, Respondent was terminated from Country Mutual for allegations of submitting altered documentation, specifically a Kansas Motor Vehicle Crash Report (“crash report”), to Country Mutual in order to obtain coverage and make a claim for payment on behalf of an insured on an inactive policy.

- a. Respondent emailed an unaltered version of the crash report with a date of loss of January 19, 2024, to himself on February 12, 2024.
- b. Respondent emailed an altered version of the crash report with a date of loss of January 24, 2024, to County Mutual home office on February 16, 2024.
- c. Text messages between the Respondent and the insured demonstrate that the Respondent was provided with the unaltered crash report with a date of loss of January 19, 2024.

7. Information was also provided by Country Mutual indicating that Respondent has previously been educated for multiple instances of entering false payment information into the company billing system in order to bypass the requirement to collect payments prior to binding coverage.

8. To date, Respondent has failed to respond to the inquiries from the Commissioner regarding the termination for cause.

9. The Department also was notified that the Respondent was charged with Identity fraud; Replicate document with personal information with intent to deceive and theft by deception, both of which are felonies, in the Johnson County District Court, Case Number JO-2025-CR-003625, on or about September 2, 2025. The offense is alleged to have occurred on May 15, 2023. This matter is currently pending with the court.

10. Based on the information and evidence provided by the termination for cause matter, the Respondent's failure to respond to an inquiry of the Commissioner within 15 business days as required, and the nature of the pending felony charges against the Respondent, the Department finds that the insurer's interest and insurable interest of the public are no longer served by this license.

#### **Applicable Law**

K.S.A. 40-4909(a)(8) provides:

The Commissioner may deny, suspend, revoke or refuse renewal of any license issued under this act if the Commissioner finds that the applicant or license holder used any fraudulent, coercive, or dishonest practice, or demonstrated any incompetence, untrustworthiness or financial irresponsibility in the conduct of business in this state or elsewhere.

K.S.A. 40-4909(a)(17) provides:

The Commissioner may revoke or refuse renewal of any license issued under this action if the Commissioner finds the producer has failed to respond to an inquiry from the commissioner within 15 business days.

K.S.A. 40-4909(b) provides:

The Commissioner may deny, suspend, revoke or refuse renewal of any license issued under this act if the Commissioner finds that the interests of the insurer or the insurable interests of the public are not properly served under such license.

### Policy Reasons

1. It is in the public interest that the license of a producer who has used any fraudulent, coercive, or dishonest practice, or demonstrated any incompetence, untrustworthiness or financial irresponsibility in the conduct of business be revoked.
2. It is in the public interest that the license of a producer who has failed to respond to an inquiry from the Commissioner be revoked.

### Conclusions of Law

1. The Commissioner has jurisdiction over **DAN BROUGH** as well as the subject matter of this proceeding, and such proceeding is held in the public interest.
2. Pursuant to K.S.A. 40-4909(a) and (b), the Commissioner finds that the insurable interests of the public are no longer properly served under the Kansas resident insurance producer's license of **DAN BROUGH**.
3. Pursuant to K.S.A. 40-4909(a) and (b), the Commissioner concludes that sufficient grounds exist for revocation of the Kansas resident insurance producer's license of **DAN BROUGH**.

**IT IS THEREFORE ORDERED BY THE COMMISSIONER OF INSURANCE THAT:**

1. The Kansas resident insurance producer's license of **DAN BROUGH** is hereby **REVOKED** the effective date of this Order.
2. **IT IS FURTHER ORDERED** that **DAN BROUGH** shall **CEASE** and **DESIST** from the sale, solicitation or negotiation of insurance in Kansas and/or receiving compensation deriving from the sale, solicitation or negotiation of insurance in Kansas conducted after the effective date of this Order.

IT IS SO ORDERED THIS 6<sup>th</sup> DAY OF November 2025, IN THE CITY  
OF TOPEKA, COUNTY OF SHAWNEE, STATE OF KANSAS.



VICKI SCHMIDT  
COMMISSIONER OF INSURANCE

BY:   
Kimberley Davenport Megrail  
Senior Attorney

### **NOTICE AND OPPORTUNITY FOR HEARING**

**DAN BROUGH**, within fifteen (15) days of service (plus 3 additional days for service by mail) of this Summary Order, you shall file with the Kansas Department of Insurance a written request for hearing on this Summary Order, as provided by K.S.A. 77-542. In the event a hearing is requested, such request should be directed to:

Mindy Forrer  
Kansas Department of Insurance  
1300 SW Arrowhead Rd.  
Topeka, Kansas 66604

Or via email: [mindy.forrer@ks.gov](mailto:mindy.forrer@ks.gov)

Any costs incurred as a result of conducting any administrative hearing shall be assessed against the producer/agency who is the subject of the hearing as provided by K.S.A. 40-4909(g). Costs shall include witness fees, mileage allowances, any costs associated with reproduction of documents which become part of the hearing record, and the expense of making a record of the hearing.

If a hearing is not requested, this Summary Order shall become effective as a Final Order, without further notice, upon the expiration of the fifteen (15) day (with an additional three (3) days for service by mail) period for requesting a hearing. The Final Order will constitute final agency action on the matter.

In the event the Respondent files a petition for judicial review, the agency officer designated pursuant to K.S.A. 77-613(e) to receive service of a petition for judicial review on behalf of the Kansas Department of Insurance is:

Steven A. Karrer, General Counsel  
Kansas Department of Insurance  
1300 SW Arrowhead Rd.  
Topeka, Kansas 66604

Pursuant to K.S.A. 77-607 and 77-612, exhaustion of administrative remedies is a jurisdictional prerequisite to seeking judicial review.

### **CERTIFICATE OF SERVICE**

The undersigned hereby certifies that she served the above and foregoing Summary Order on this 6<sup>th</sup> day of November, 2025, by causing the same to be deposited in the United States Mail, certified, addressed to the following:

Dan Brough

[REDACTED]

Kansas City, KS 66112

And via email to:

[REDACTED]

[@countryfinancial.com](mailto:[REDACTED]@countryfinancial.com)



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Sarah Cowan  
Legal Assistant