

STATE OF OREGON
DEPARTMENT OF CONSUMER AND BUSINESS SERVICES
DIVISION OF FINANCIAL REGULATION

In the Matter of:

Case No. INS-25-0056

ASHLEY BARNHARDT,

Respondent.

ORDER TO CEASE AND DESIST
AND ORDER REVOKING
LICENSE, ENTERED BY
DEFAULT

On December 11, 2025, the Director of the Department of Consumer and Business Services for the State of Oregon (“Director”), by and through the Division of Financial Regulation (“Division”), and acting in accordance with Oregon Revised Statutes (“ORS”) chapters 731, 732, 733, 734, 735, 737, 742, 743, 743A, 743B, 744, 746, 748 and 750 (“Insurance Code”), properly served notice (the “Notice”) on Ashley Barnhardt (“Respondent”) that the Director intended to revoke Respondent’s non-resident insurance producer license for violating certain provisions of the Insurance Code and the Oregon Administrative Rules (“OAR”) promulgated under those laws.

The Notice offered Respondent an opportunity for a hearing if requested within 20 days. The Notice further informed Respondent that if a hearing was not conducted because Respondent did not timely request a hearing or otherwise defaulted, then the designated portion of the Director’s file and all materials submitted by Respondent in this case would automatically become part of the contested case record for the purpose of proving a *prima facie* case.

The Director did not receive a hearing request from Respondent and did not conduct a hearing.

The Director finds that the record of this proceeding proves a *prima facie* case.

The Director makes the following Findings of Fact, Conclusions of Law, Orders, and Notice of Right to Judicial Appeal.

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350 Winter Street NE, Suite 410
Salem, OR 97301-3881
Telephone: (503) 378-4387



1 FINDINGS OF FACT

2 The Director FINDS that:

3 1. Respondent has held an Oregon nonresident insurance producer license
4 (“License”) since October 30, 2023. Respondent’s National Producer Number is
5 19326025.

6 2. Respondent was employed at Royal Neighbors of America (“Royal
7 Neighbors”) until or around June 13, 2025.

8 3. On June 16, 2025, Royal Neighbors notified the Division that Respondent was
9 terminated for cause for committing fraudulent, illegal, or dishonest acts relating to an
10 improperly submitted electronic life insurance application for an applicant that predeceased
11 the application.

12 4. A consumer who will be identified for purposes of this Order as BM died on
13 December 13, 2024.

14 5. BM had a life insurance policy with Royal Neighbors, and death benefits were
15 paid on January 16, 2025.

16 6. Royal Neighbor’s investigation revealed that Respondent submitted a life
17 insurance application on January 20, 2025, for BM. The application was completed as an
18 “in-person electronic application,” meaning Respondent completed the application with
19 BM in person and that all documents were reviewed and electronically signed in front of
20 Respondent even though BM had been deceased since December 13, 2024. The new
21 application contained personally identifiable information for BM, including name, date of
22 birth, and Social Security number.

23 7. Royal Neighbors requested a statement from Respondent explaining how the
24 application was completed. Respondent explained that the application was completed in
25 error. Respondent stated she intended to file a death claim for BM and complete an
26 application for BM’s surviving spouse, LM, whose policy had lapsed with Royal

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1 Neighbors. Respondent claims she mistakenly completed the application for BM instead
2 of LM.

3 8. The death claim was already filed on December 13, 2024, by Slate Funeral
4 Home, and a letter was sent to LM on January 15, 2025, informing him that the checks for
5 the claim were being disbursed under separate cover, with one check sent to Slate Funeral
6 Home and another sent directly to LM. The death claim was therefore paid on January 15,
7 2025, before the date of the new application on January 20, 2025.

8 9. Though Respondent claimed the January 20, 2025 application for BM was
9 allegedly intended to be filed for LM, Royal Neighbors has no record of any applications
10 for a policy on the life of LM submitted on or after January 20, 2025.

11 10. Royal Neighbors' application process requires the agent to read each question
12 on the application to the applicant and record the answers on the application exactly as they
13 are provided. The agent is then required to allow the applicant to review all of the questions
14 and answers on the application prior to the applicant signing the application. Royal
15 Neighbors therefore concluded that the application for BM could not have been completed
16 in error, as Respondent alleges.

17 11. The January 20, 2025 application was electronically signed by BM rather than
18 LM, even though Respondent alleges the application was actually for LM and BM was
19 deceased.

20 CONCLUSIONS OF LAW

21 The Director CONCLUDES that:

22 12. Pursuant to ORS 731.252(1), whenever the Director has reason to believe that
23 any person has been engaged or is engaging or is about to engage in any violation of the
24 Insurance Code, the Director may issue an order to discontinue or desist from such
25 violation or threatened violation.

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1 13. Pursuant to ORS 744.074(1)(g), the Director may revoke an insurance producer
2 license for having admitted or been found to have committed any unfair trade practice or
3 fraud related to insurance.

4 14. Respondent violated ORS 744.074(1)(g) by providing fraudulent information
5 regarding the life insurance policy application filed on behalf of a deceased person.

6 15. Pursuant to ORS 744(1)(h), the Director may revoke an insurance producer
7 license for using fraudulent, coercive or dishonest practices, or demonstrating
8 incompetence, untrustworthiness or financial irresponsibility in the conduct of business
9 this state or elsewhere.

10 16. Respondent violated ORS 744.074(1)(h) by providing fraudulent and dishonest
11 information regarding the life insurance policy filed on behalf of a deceased person.

12 17. Pursuant to ORS 744.074(1)(k), the Director may revoke an insurance producer
13 license for forging another person's name to an application for insurance or to any
14 document related to an insurance transaction.

15 18. Respondent violated ORS 744.074(1)(k) by electronically signing the life
16 insurance policy application on behalf of a deceased person.

17 **ORDERS**

18 Now therefore, the Director issues the following Orders:

19 19. As authorized by ORS 731.252(1), the Director hereby ORDERS Respondent
20 to CEASE AND DESIST from violating ORS 744.074(1)(g), (h) and (k).

21 20. As authorized by ORS 744.744.074(1)(g), (h), and (k), the Director hereby
22 REVOKES Respondent's Oregon nonresident insurance producer license.

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FINAL ORDER

21. This Order is a “Final Order” under ORS 183.310(6)(b). Subject to that provision, the entry of this Order does not limit other remedies that are available to the Director Under Oregon Law.

IT IS SO ORDERED.

Dated this 12th day of January, 2026.

SEAN O’DAY, Director
Department of Consumer and Business Services

/s/ Dorothy Bean
Dorothy Bean, Chief of Enforcement
Division of Financial Regulation

NOTICE OF RIGHT TO JUDICIAL APPEAL

You are entitled to judicial review of this order in accordance with ORS 183.482. You may request judicial review by filing a petition with the Court of Appeals in Salem, Oregon, within 60 days from the date this order is served.

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