

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

In the Matter of:

Case No. INS-25-0088

CARLOS HIGUERA, an Individual,
Respondent.

FINAL ORDER TO CEASE AND
DESIST AND FINAL ORDER
ASSESSING CIVIL PENALTIES,
ENTERED BY DEFAULT

On December 2, 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”), served an Order to Cease and Desist and Proposed Order to Assess Civil Penalties (“Notice”) on Carlos Higuera (“Respondent”).

The Notice offered Respondent an opportunity for a hearing if requested within 20 days of service of the Notice. 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 Division’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 from Respondent a request for a hearing and did not conduct a hearing.

FINDINGS OF FACT

The Director FINDS that:

1. At all relevant times, Respondent was employed by, and/or working on behalf of, Ironside Claims LLC (Ironside”), a California limited liability company managed by Anssi Viljanen (“Viljanen”).¹

¹ See Division case number INS-25-0052 against Ironside and Viljanen.

Division of Financial Regulation
Labor and Industries Building
350 Winter Street NE, Suite 410
Salem, OR 97301-3881
Telephone: (503) 378-4387



1 in negotiating and settling 1st and 3rd party homeowners insurance claims for wildfire-
2 related damages.

3 8. Respondent acted in an untrustworthy manner, in violation of ORS
4 744.584(1)(a), by facilitating and contributing to Ironside’s coercive and deceptive
5 practices, as set forth in Paragraphs (3) – (6).

6 9. Because the Director has reason to believe that Respondent has been engaged
7 in violations of the Insurance Code, the Director may issue an order to Respondent to cease
8 and desist, under ORS 731.252(1).

9 10. The Director may impose a civil penalty of up \$10,000 *per violation* upon any
10 person who violates a provision of the Insurance Code, under ORS 731.988(1). The civil
11 penalty for individual insurance adjusters may not exceed \$1,000 for each offense.

12 ORDERS

13 Now therefore, the Director issues the following ORDERS:

14 11. As authorized by ORS 731.252(1), the Director hereby ORDERS Respondent
15 to CEASE AND DESIST from violating ORS 744.584(1)(a).

16 12. As authorized by ORS 731.988(1), the Director hereby ORDERS that
17 Respondent be subject to a CIVIL PENALTY of \$1,000 for violating ORS 744.584(1)(a).

18 ///

19 ///

20 ///

21 ///

22 ///

23 ///

24 ///

25 ///

26 ///

Division of Financial Regulation
Labor and Industries Building
350 Winter Street NE, Suite 410
Salem, OR 97301-3881
Telephone: (503) 378-4387



1 13. This is a “Final Order” under ORS 183.310(6)(b). Subject to this provision, the
2 entry of this Order does not limit further remedies that may be available to the Director
3 under Oregon law.

4
5 SO ORDERED this 5th day of January, 2026.

6
7 SEAN O’DAY, Director
8 Department of Consumer and Business Services

9 /s/ Dorothy Bean
10 Dorothy Bean, Chief of Enforcement
11 Division of Financial Regulation

12
13
14 NOTICE OF RIGHT TO JUDICIAL APPEAL

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

18
19
20
21
22
23
24
25
26
Division of Financial Regulation
Labor and Industries Building
350 Winter Street NE, Suite 410
Salem, OR 97301-3881
Telephone: (503) 378-4387

