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

In the Matter of: INSURED NOMADS CORPORATION, Respondent.	Case No. INS-25-0007 FINAL ORDER TO CEASE AND DESIST, FINAL ORDER ASSESSING CIVIL PENALTIES, AND CONSENT TO ENTRY OF ORDER

The Division of Financial Regulation (the "Division"), acting on behalf of the Director of the Department of Consumer and Business Services for the State of Oregon (the "Director"), conducted an investigation of Insured Nomads Corporation ("Respondent"). The Division determined that Respondent violated certain provisions of Oregon Revised Statutes ("ORS") chapters 731, 732, 733, 734, 735, 737, 742, 743, 743A, 744, 746, 748, and 750 ("Insurance Code") and the Oregon Administrative Rules ("OAR") promulgated under those laws.

Respondent cooperated with the Director's investigation and wishes to settle this matter.

Now, therefore, as evidenced by the signature(s) subscribed on this Order, Respondent hereby CONSENTS to entry of this Order upon the Director's Findings of Fact and Conclusions of Law, as stated below.

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

FINDINGS OF FACT

The Director FINDS that:

1. On knowledge and belief, Respondent is domiciled in Delaware. Respondent's business address is 206 Churchill Drive, Wilmington, DE 19803.

2. Respondent's National Association of Insurance Commissioners ("NAIC") national producer number is 19616300, and Respondent was first licensed as an Oregon non-resident business entity insurance producer on June 9, 2021.

3. Respondent is licensed in its resident state as an insurance producer and holds a line of authority for travel insurance only.

4. On or about August 15, 2024, Respondent contacted the Division to add a new Designated Responsible Licensed Producer to its license. At that time, the Division discovered the business holds lines of authority in Oregon for life, health, property, and casualty but only held a license for a travel line of insurance in its resident state.

5. On August 28, 2024, the Division contacted Respondent by email to inform it that it could not hold lines of authority in Oregon that it did not hold in its resident state. The Division then requested that Respondent voluntarily surrender all four lines of authority it held in Oregon because it did not hold licenses for any of those lines in its resident state. The Division also requested that Respondent apply for a travel insurance line of authority in Oregon because it held only a travel license in its resident state. Alternatively, Respondent could add health, life, property, and casualty lines of authority in its home state.

6. On August 30, 2024, the Division received a voluntary surrender form from Respondent for only the life insurance line of authority.

7. The Division called and left messages for Respondent beginning October 2, 2024, stating that the current licenses must be surrendered and a limited travel license acquired. The messages also warned that failure to respond or cooperate may result in revocation of Respondent's license in Oregon. The Division did not receive a response.

8. On January 2, 2025, the Division emailed Respondent and reiterated that "non-resident lines of authority are limited to the authority you have in your domicile state." The Division acknowledges that it received Respondent's voluntary surrender of their life insurance line of authority; however, we did not receive any information regarding the health, property, and casualty lines. The Division again requested that Respondent voluntarily surrender its non-resident producer license for the remaining lines of authority.

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

The Division requested a response by January 10, 2025. Respondent failed to respond.

CONCLUSIONS OF LAW

The Director CONCLUDES that:

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

10. Pursuant to ORS 731.296, the Director may address any proper inquiries to any licensee in relation to its activities or conditions or any other matter connected with its transactions. Any such person so addressed shall promptly and truthfully reply to such inquiries using the form of communication requested by the Director.

11. Respondent violated ORS 731.296 by failing to respond to the Division's October 2, 2024 and January 2, 2025, email and other communications.

12. Pursuant to ORS 744.063(1)(a), a non-resident person must be currently licensed as a resident insurance producer in good standing in the person's home state.

13. Pursuant to ORS 744.063(1)(d), a person shall receive a non-resident insurance producer license in Oregon if the person's home state grants non-resident insurance producer licenses to residents of this state *on the same basis*. [Emphasis added]

14. Pursuant to ORS 744.063(2), the Director is authorized to verify an insurance producer's licensing status through the NAIC.

15. Pursuant to ORS 744.059(1)(e), a non-resident insurance producer must have successfully passed the examination for the lines of authority for which the insurance producer has applied. This examination can only be administered in the insurance producer's home state.

16. Read together, the above-cited provisions of ORS 744.063 require an insurance producer to hold the same license in their home state to receive reciprocal licensure in

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

Oregon. Respondent violated ORS 744.063 by failing to hold the same licenses, or lines of authority, in its home state as it obtained for its Oregon license.

17. Respondent violated ORS 731.059(1)(e) by failing to hold licenses in the particular lines of authority in its home state to qualify for licensure for the same lines of authority in Oregon.

18. Pursuant to ORS 744.074(1)(b), the Director may revoke an insurance producer license for violating any insurance laws, including, but not limited to, ORS 731.296, ORS 744.063, and ORS 744.059

ORDERS

Now therefore, the Director issues the following Orders:

19. As authorized by ORS 731.252(1), the Director hereby ORDERS Respondent to CEASE AND DESIST from violating ORS 744.738(1).

20. As authorized by ORS 731.988(1), the Director hereby ORDERS that Respondent be subject to a CIVIL PENALTY of $1,000 for violating ORS 744.738(1).

21. The Director SUSPENDS $500 of the CIVIL PENALTY, provided that Respondent does not violate the terms of this Consent Order.

22. If Respondent satisfies the above conditions for a period of three years after the effective date of this Order, the Director shall waive the $500 suspended portion of the civil penalties. If Respondent fails to satisfy the above conditions during the three-year period following the effective date of this Order, however, the suspended portion of the civil penalties will become immediately due and owing.

23. Along with this Order, Respondent shall submit $500 to the Director as payment for the non-suspended civil penalties. Such payment shall be made at the time Respondent signs and returns this Consent Order to the Director.

24. In lieu of revocation, Respondent has agreed to designate an alternative Designated Responsible Licensed Producer for its license, whom is licensed in all lines of

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

insurance for which Respondent seeks a license in Oregon. Upon making such designation, Respondent's license application will be reviewed in the ordinary course. Respondent agrees to promptly respond to any and all inquiries from the Division relating to its license application.

25. This Order is a "Final Order" under ORS 183.310(6)(b). Subject to that provision, entry of this Order does not limit or prevent further remedies available to the Director under Oregon law to enforce this Order or take action for violations of this Order or of the Insurance Code not covered by this Order.

SO ORDERED this 9th day of October, 2025.

SEAN O'DAY, Interim Director
Department of Consumer and Business Services

/s/ Dorothy Bean

Dorothy Bean, Chief of Enforcement
Division of Financial Regulation

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

ENTITY CONSENT TO ENTRY OF ORDER

I, John Andrew Jernigan, am an officer or manager of Insured Nomads Corporation ("Insured Nomads"), and I am authorized to act and sign on its behalf. I have read the foregoing Order, and I know and fully understand the contents hereof. The factual allegations stated herein are true and correct. Insured Nomads has been advised of the right to a hearing and of the right to be represented by counsel in this matter. Insured Nomads voluntarily consents to the entry of this Order without any force or duress, expressly waiving any right to a hearing in this matter, as well as any rights to administrative or judicial review of this Order. Insured Nomads understands that the Director reserves the right to take further action against it to enforce this Order or to take appropriate action upon discovery that Insured Nomads has committed other violations of the Insurance Code. Insured Nomads, along with its officers, directors, employees, or agents, will fully comply with the terms and conditions stated herein.

Insured Nomads understands that this Order is a public document.

Signature: /s/ John Andrew Jernigan

Position Held: CEO

State of Pennsylvania

County of Chester

Signed or attested before me on this 6th day of October, 2025.

/s/ Jared Keebler

Notary Public

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