

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

In the Matter of:

Case No. INS-25-0051

NEXT INSURANCE US COMPANY, a
Delaware Corporation,

ORDER TO CEASE AND DESIST,
ORDER ASSESSING CIVIL
PENALTIES, AND CONSENT TO
ENTRY OF ORDER

Respondent.

THIS IS A FINAL ORDER

The Director of the Department of Consumer and Business Services for the State of Oregon (“Director”), acting by and through the Division of Financial Regulation (“Division”), in accordance with Oregon Revised Statutes (“ORS”) 731, 732, 733, 734, 735, 737, 742, 743, 743A, 743B, 744, 746, 748 and 750, and the Oregon Administrative Rules (“OARs”) promulgated thereunder (“Oregon Insurance Code”) has determined that NEXT Insurance US Company (“NEXT”) engaged in activities constituting violations of the Oregon Insurance Code.

NEXT wishes to resolve and settle this matter with the Director.

Now, therefore, as evidenced by the authorized signatures subscribed on this Order, NEXT hereby CONSENTS to entry of this Order upon the Director’s Findings of Fact and Conclusions of Law as stated hereinafter.

FINDINGS OF FACT

The Director FINDS that:

1. NEXT is a Property and Casualty carrier that provides Property and Casualty insurance in Oregon. NEXT’s NAIC Company Code Number is 16285.

///

///

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



1 2. NEXT’s business address is 251 Little Falls Drive, Wilmington, Delaware
2 19808.

3 The EW Complaint

4 3. On May 1, 2023, the Division received a complaint from an Oregon consumer
5 who will be identified for purposes of this Order as EW. In his complaint, EW alleged that
6 he was being defrauded by an insurance producer named Joshua Bekhor (“Bekhor”).

7 4. In investigating this complaint, the Division discovered that Bekhor was not
8 licensed as an insurance producer in Oregon and had contacted EW through a website
9 operated by NEXT.

10 The NEXT Website

11 5. NEXT operates a website that puts consumers in contact with insurance
12 producers selling NEXT insurance policies.

13 6. As part of the Division’s investigation, NEXT disclosed 13 instances where
14 third-party agents not licensed in Oregon used the NEXT website to sell NEXT insurance
15 policies to Oregon consumers.

16 Pedro Casillas

17 7. On April 21, 2022, a Nevada-based insurance producer named Pedro Casillas
18 (“Casillas”) sold a commercial general liability policy to an Oregon consumer, who will
19 be identified for purposes of this Order as DR, using the NEXT website.

20 8. In response to an inquiry from the Division’s investigator, Casillas stated that
21 when the NEXT insurance website forwarded him DR’s request for a quote for an
22 insurance policy, he assumed DR was located in Nevada.

23 9. NEXT also processed a renewal of DR’s insurance policy with Casillas
24 identified as the producer of record.

25 ///

26 ///





1 Cynthia Braaksma

2 20. On July 5, 2021, an Idaho-based insurance producer named Cynthia Braaksma
3 (“Braaksma”) sold a Commercial General Liability insurance policy to an Oregon
4 consumer, who will be identified for purposes of this Order as TR, using the NEXT
5 website.

6 21. In addition to the initial sale, NEXT also processed two renewals for TR’s
7 policy with Braaksma identified as the producer of record.

8 22. NEXT paid Braaksma \$95.70 in total commissions related to the TR insurance
9 policy.

10 23. At the time of the initial sale and of the renewals, Braaksma was not licensed
11 as an insurance producer in Oregon.

12 Susanne O’Campo

13 24. On January 11, 2021, a Colorado-based insurance producer named Susanne
14 O’Campo sold a Commercial General Liability policy to an Oregon consumer, who will
15 be identified for purposes of this Order as GS, using the NEXT website.

16 25. In addition to this initial sale, NEXT processed a renewal of GS’ policy with
17 O’Campo listed as the producer of record.

18 26. NEXT paid O’Campo \$1,441.54 in total commissions related to the GS
19 insurance policy.

20 27. At the time of the initial sale and of the renewal, O’Campo was not licensed as
21 an insurance producer in Oregon.

22 Valeri Orsini

23 28. On August 3, 2023, a California-based insurance producer named Valeri Orsini
24 sold a Commercial General Liability insurance policy to an Oregon consumer, who will be
25 identified for the purposes of this Order as GC, using the NEXT website.

26 ///



1 29. NEXT paid Orsini \$289.31 in total commissions related to the GS insurance
2 policy.

3 30. At the time of this sale, Orsini was not licensed in as an insurance producer in
4 Oregon.²

5 Use of Unapproved Forms

6 31. In November of 2022, NEXT began withdrawing from its Commercial
7 Automobile line of business.

8 32. As part of this process NEXT sent notices to its customers in Oregon advising
9 that NEXT would be withdrawing from the Commercial Automobile line of business.

10 33. NEXT did not send these notices to the Division for approval prior to sending
11 them to Oregon consumers.

12 Corrective Actions

13 34. In 2022, following an internal review, NEXT proactively implemented
14 enhanced internal controls aimed at preventing individuals and business entities who are
15 not properly licensed as insurance producers in Oregon from acting on behalf of NEXT or
16 receiving commissions from sales of insurance policies in Oregon.

17 35. Upon discovering that withdrawal notices were issued prior to regulatory
18 approval, NEXT self-reported the matter to the Division. NEXT has since implemented
19 enhanced compliance controls and review procedures requiring that such notices are filed
20 and approved prior to issuance.

21 **CONCLUSIONS OF LAW**

22 The Director CONCLUDES the following:

23 Paying Commissions to Unlicensed Persons

24 36. ORS 744.076(1) forbids insurance carriers from paying “a commission, service
25 fee, brokerage or other valuable consideration” to a person for “selling, soliciting or

26 ² Orsini obtained an Oregon nonresident insurance producer license on April 19, 2024.

1 negotiating insurance” in Oregon if that person is required to be licensed as an insurance
2 producer in Oregon and is not so licensed.

3 37. ORS 744.053 states that a person must have an Oregon insurance producer
4 license in order to “sell, solicit or negotiate insurance in this state.”

5 38. NEXT violated ORS 744.076(1) in 13 instances, as described in Paragraphs 7
6 to 30 above, by paying commissions for the sale of insurance policies in Oregon to persons
7 who were not licensed as insurance producers in Oregon.

8 Use of Unapproved Forms

9 39. ORS 742.003(1) forbids insurance carriers from delivering or issuing any
10 “basic policy form or application” to consumers “until the form has been filed with and
11 approved by the Director of the Department of Consumer and Business Services.”

12 40. NEXT violated ORS 742.003(1) by sending withdrawal notices to its Oregon
13 commercial automobile customers without receiving prior approval from the Director.

14 Cease and Desist Authority

15 41. Under ORS 731.252 (1), because the Director has reason to believe that NEXT
16 has engaged in violations of ORS 742.003(1) and ORS 744.076(1), the Director may issue
17 an order to NEXT to cease and desist from violations of ORS 742.003(1) and ORS
18 744.076(1).

19 Civil Penalties Authority

20 42. Under ORS 731.988(1), the Director may impose a civil penalty in an amount
21 not to exceed \$10,000 for each violation of the Insurance Code. Each violation is a separate
22 offense.

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 ORDERS

2 Now therefore, the Director issues the following Orders:

3 Cease and Desist

4 43. As authorized by ORS 731.252 (1), the Director ORDERS NEXT to CEASE
5 AND DESIST from violating ORS 744.076(1) and ORS 742.003(1).

6 Civil Penalties

7 44. As authorized by ORS 731.988(1), the Director hereby ORDERS that NEXT
8 be subject to a CIVIL PENALTY of \$100,000 as follows:

- 9 (a) \$90,000 for violating ORS 744.076(1) in 13 instances; and
- 10 (b) \$10,000 for violating ORS 742.003(1) in one instance.

11
12 45. The Director hereby SUSPENDS payment of \$60,000 of the CIVIL PENALTY
13 imposed on NEXT for a period of three years from the effective date of this Order, provided
14 NEXT complies with the terms of this Order.

15 46. The \$40,000 non-suspended CIVIL PENALTY assessed herein against NEXT
16 is due and payable at the time this Order is returned to the Division.

17 47. The \$60,000 suspended CIVIL PENALTY will be waived three years from the
18 effective date of this Order, provided NEXT has complied with the forgoing Order terms
19 and does not commit any further violations of ORS 746.074(1) or ORS 742.003(1) during
20 the three year period. The Director reserves the right to immediately assess and collect the
21 suspended civil penalty upon a determination that NEXT has violated any term
22 of this Order or has committed any further violation of ORS 744.076(1) or ORS
23 742.003(1).

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

4 SO ORDERED this ____ day of _____, 2026.

5 Sean O’Day, Director
6 Department of Consumer and Business Services

7 _____
8 Dorothy Bean, Chief of Enforcement
9 Division of Financial Regulation

10 *[This page intentionally left blank.]*
11
12
13
14
15
16
17
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
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26

ENTITY CONSENT TO ENTRY OF ORDER

I, Rachel Jrade, state that I am an officer of NEXT Insurance US Company. (“NEXT”) and am authorized to act on its behalf. I have read the foregoing Order and I know and fully understand the contents hereof. I have been advised of NEXT’s right to a hearing and right to be represented by counsel in this matter. NEXT 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. NEXT understands that the Director reserves the right to take further actions against it to enforce this Order or to take appropriate action upon discovery of other violations of the Oregon Insurance Code by NEXT. NEXT will fully comply with the terms and conditions stated herein.

NEXT understands that this Consent Order is a public document.

Signature: /s/ Rachel Jrade

Position Held: Secretary and General Counsel

State of Santa Clara

County of California

Signed or attested before me on this 17th day of February, 2026

By _____.

/s/ Lauren Anne Bracciodieta

Notary Public

[The remainder of this page intentionally left blank.]

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

