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

In the Matter of: DENISE PERREAULT *an individual* and NEW ERA INSURANCE LLC *an Oregon corporation*, Respondents.	Case No. INS-25-0069 ORDER TO CEASE AND DESIST, AND ORDERS SUSPENDING LICENSE AND ASSESSING CIVIL PENALTIES, AND CONSENT TO ENTRY OF ORDER 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 Oregon Division of Financial Regulation ("Division), and 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") and ORS 183.430(2), has concluded that Denise Perreault ("Perreault") and New Era Insurance LLC ("New Era") engaged in conduct that violated the Insurance Code

Perreault and New Era wish to resolve and settle this matter with the Director.

Now, therefore, as evidenced by the authorized signatures subscribed on this Order, Perreault and New Era hereby CONSENT 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. Perreault is licensed as an Oregon resident insurance producer. Perreault's National Producer Number (NPN) is 105541. Perreault's last known business address is 1742 NE 43rd St. Portland, OR 97213-0368.

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2. Perreault is the owner and Designated Responsible Licensed Producer (DRLP) of New Era. New Era is licensed as a resident business entity insurance producer. New Era's NPN is 5778832.

The Client Policy

3. On or about June 7, 2024, Perreault submitted a premium finance agreement to Imperial Premium Financing Specialists ("IPFS") on behalf of a client of New Era that will be identified for purposes of this Order as "Client". The purpose of the premium finance agreement was to facilitate the purchase by Client of an insurance policy ("Policy") from Accelerant Specialty Insurance Company ("Accelerant").

4. IPFS accepted the agreement, and on July 11, 2024, IPFS made a payment in the amount of $8,752.63 to New Era to finance the premium for Client's insurance policy.

5. In addition to the premium finance payment from IPFS, on August 5, 2024, New Era collected a $6,631 from Client as a downpayment for the Policy.

6. Under the terms of the premium finance agreement, New Era was to remit these funds to One80 Intermediaries ("One80") to pay the premium for the Policy. However, One80 never received these funds.

7. On or around November 7, 2024, Accelerant cancelled the Policy. Because One80 never received the premium for the Policy, the cancellation was done with an effective date of June 7, 2024.

8. Despite the cancellation of the Policy, New Era did not issue refunds to IPFS or to Client until after the Division's investigator contacted New Era and Perreault. New Era issued a refund of the premium finance payment remitted by IPFS on May 30, 2025 and a refund of the down payment received from Client on June 10, 2025.

New Era Trust Account

9. New Era maintains a client premium trust account ("Trust Account") with Umpqua Bank.

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10. On July 12, 2024, IPFS deposited $8,572.63 into the Trust Account to pay the premium for the Policy. The Trust Account's end-of-month balance for July 2024 was $11,531.71.

11. On August 5, 2024, Perreault deposited Client's $6,631 downpayment into the Trust Account.

12. Despite the fact that New Era failed to remit the premium for the Policy to One80, the ending balance in August 2024 of the Trust Account was $540.78, with three overdraft fees.

13. Between August of 2024 and December of 2024, The balance of the Trust Account was never sufficient to pay the premium for the Policy or to refund the premium payment from IPFS or the downpayment from Client. During this same time period, the Trust Account incurred eight overdrafts.

14. Between July of 2024 and February of 2025, Perreault transferred $22,784.55 from the Trust Account into New Era's operating bank account and $2,285 into Perreault's personal bank account. On knowledge and belief, these funds were used to pay New Era's business expenses and Perreault's personal expenses, respectively.

Perreault's Injury

15. On June 11, 2024, Perreault suffered injuries in a fall. According to Perreault these injuries—and Perreault's subsequent convalescence—impacted her ability to manage New Era's business operations.

16. During the timeframe at issue in this Order, Perreault was the only person working for New Era. Perreault and New Era did have some bookkeeping assistance until the end of 2024.

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CONCLUSIONS OF LAW

The Director CONCLUDES that:

Conversion

17. ORS 744.074(1)(d) forbids any person from "withholding, misappropriating or converting any moneys or properties received" in the course of doing insurance business.

18. Perreault and New Era violated ORS 744.074(1)(d) by using the funds remitted by IFPS to pay the premium for the Policy for New Era's business expenses and Perreault's personal expenses.

19. Perreault and New Era further violated ORS 744.074(1)(d) by using the funds remitted by Client as a downpayment on the premium of the Policy for New Era's business expenses and Perreault's personal expenses.

Irresponsible Business Practices

20. ORS 744.074(1)(h) forbids any person from engaging in "fraudulent, coercive or dishonest practices, or demonstrating incompetence, untrustworthiness or financial irresponsibility" in the course of business as an insurance producer.

21. Perreault, individually and in her capacity as DRLP of New Era, violated ORS 744.074(1)(h) by failing to put measures in place to ensure that the business operations of New Era Insurance LLC could continue while she was convalescing from injuries, resulting in the flat cancellation of the Policy.

Misappropriation of Premiums

22. Pursuant to ORS 746.120, no person shall willfully collect any sum as premium or charge for insurance which is not then provided or is not in due course to be provided subject to acceptance of the risk by the insurer, under an insurance policy issued by an insurer in conformity to the Insurance Code.

23. Perreault and New Era violated ORS 746.120 by collecting the $6,313 premium downpayment from Client and failing to remit those funds to One80.

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24. Perreault and New Era violated ORS 746.120 by collecting the $8,572.63 premium finance payment from IPFS and failing to remit those funds to One80.

Comingling Agency Trust Assets

25. ORS 744.083(1) and (2) require that all premium funds received by an insurance producer "be accounted for and maintained in a trust account separate from all other business and personal funds," and prohibits a producer from comingling or otherwise combining premiums with any other moneys.

26. Perreault and New Era violated ORS 744.083(1) and (2) by transferring funds from the IPFS payment and the Client downpayment into New Era's operating account and Perreault's personal bank account.

Authority for Licensing Action

27. Pursuant to ORS 744.074(1)(d), the Director may "place a licensee on probation or suspend, revoke or refuse to issue or renew an insurance producer license" for "[i]mproperly withholding, misappropriating or converting any moneys or properties received" in the course of the insurance business.

28. Perreault and New Era improperly withheld, misappropriated or converted money or property received in the course of her insurance business as described in Paragraphs 17-19 and 22-24 above, thereby authorizing the Director to suspend or revoke Perreault's and New Era's insurance producer licenses pursuant to ORS 744.074(1)(d).

29. Pursuant to ORS 744.074(1)(h), the Director may "place a licensee on probation or suspend, revoke or refuse to issue or renew an insurance producer license" for engaging in "fraudulent, coercive or dishonest practices, or demonstrating incompetence, untrustworthiness or financial irresponsibility" in the course of business as an insurance producer.

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30. Perreault and New Era violated ORS 744.074(1)(h) as described in Paragraphs 20-21, above, thereby authorizing the Director to suspend or revoke Perreault's and New Era's insurance producer licenses pursuant to ORS 744.074(1)(h).

Cease and Desist Authority

31. 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.

Civil Penalties Authority

32. Pursuant to ORS 731.988(1), the Director may assess civil penalties in the amount of $1,000 per violation against any person who violates the Insurance Code.

ORDERS

The Director issues the following Orders:

Cease and Desist

33. Pursuant to ORS 731.252(1), the Director ORDERS Perreault and New Era to CEASE and DESIST from violating ORS 744.074(1)(d) and (h), ORS 746.120, and ORS 744.083(1) and (2).

License Suspension

34. Pursuant to ORS 744.074(1)(d) and (h), the Director hereby SUSPENDS Perreault's Oregon resident insurance producer license and New Era's Oregon business entity insurance producer license for a period of 30 days.

Civil Penalties

35. The Director hereby ORDERS the assessment of CIVIL PENALTIES against Perreault and New Era Insurance, LLC, jointly and severally, in the amount of $6,000 as follows:

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(a) $2,000 for violating ORS 744.074(1)(d) in two instances, as described in Paragraphs 17-19, above;

(b) $1,000 for violating ORS 744.074(1)(h) as described in Paragraphs 20-21, above;

(c) $2,000 for violating ORS 746.120 in two instances, as described in Paragraphs 22-24, above; and

(d) $1,000 for violating ORS 744.083(1) and (2) as described in Paragraphs 25-26, above.

36. The Director hereby SUSPENDS $4,500 of the $6,000 CIVIL PENALTY for a period of three years from the effective date of this Order, provided that, for a period of three years following the effective date of this Order, Perreault and New Era have complied with the Order terms and committed no new violations of the Insurance Code or of any rules adopted thereunder. The failure of Perreault or New Era to fulfill any of the terms of this Order shall render the suspended penalties immediately due and payable.

37. The remaining $1,500 of the CIVIL PENALTY assessed herein is due and payable as follows:

(a) $375 at the time this Order is returned to the Division;

(b) $375 on the 30th day after the effective date of this Order;

(c) $375 on the 60th day after the effective date of this Order;

(d) $375 on the 90th day after the effective date of this Order.

38. The suspended CIVIL PENALTY will be waived three years from the effective date of this Order, provided Perreault and New Era comply with the following terms:

(a) Within 30 days of the effective date of this Order, Perreault and New Era shall provide to the Division a proposed Continuity of Operations plan ("Plan") designed to minimize disruption to New Era's clients if Perreault is incapacitated in the future. The Division will have 30 days from its receipt of the proposed Plan to provide revisions to the Plan, following which the Plan will be incorporated into the terms of this Order. The Plan shall include the following:

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(i) A description of the practices New Era will follow to prevent any commingling of funds from New Era's premium trust account; and

(ii) A mechanism for Perreault or New Era to notify New Era's clients if Perreault or New Era are unable to conduct business as usual for any period longer than five (5) business days.

(b) For a period of three years following the effective date of this Order, Perreault and New Era shall commit no new violations of the Insurance Code or any rules adopted thereunder.

Final Order

39. 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.

SO ORDERED this 20th day of July, 2026.

Sean E. O'Day, Director
Department of Consumer and Business Services

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

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CONSENT TO ENTRY OF ORDER

I, DENISE PERREAULT, state that I have read the foregoing Consent Order and that I know and fully understand the contents hereof; that the factual allegations stated herein are true and correct; that I have been advised of my right to a hearing, and that I have been advised of my right to be represented by counsel in this matter; that I voluntarily consent to the entry of this Consent 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 Consent Order; that I understand that the Director reserves the right to take further actions against me to enforce this Consent Order or to take appropriate action upon discovery of other violations of the Insurance Code by me; and that I will fully comply with the terms and conditions stated herein.

I understand that this Consent Order is a public document.

/s/ Denise Perreault
Signature

State of Oregon

County of Clackamas

Signed or attested before me on this 2nd day of July, 2026 by Denise Perreault.

/s/ David Norman Blatter
Notary Public

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ENTITY CONSENT TO ENTRY OF ORDER

I, DENISE PERREAULT, state that I am an officer of NEW ERA INSURANCE LLC and 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 NEW ERA INSURANCE LLC'S right to a hearing and right to be represented by counsel in this matter. NEW ERA INSURANCE LLC 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. NEW ERA INSURANCE LLC 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 Insurance Code by NEW ERA INSURANCE LLC. NEW ERA INSURANCE LLC will fully comply with the terms and conditions stated herein.

NEW ERA INSURANCE LLC understands that this Consent Order is a public document.

Signature: /s/ Denise Perreault

Position Held: Member LLC

State of Oregon

County of Clackamas

Signed or attested before me on this 2nd day of July, 2026

By Denise Perreault

/s/ David Norman Blatter

Notary Public

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