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

In the Matter of RHODA WILLIAMS, Respondent.	Case No. INS-25-0073 ORDER TO CEASE AND DESIST AND ORDER ASSESSING CIVIL PENALTIES, ENTERED BY DEFAULT

On March 3, 2026, 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 Rhoda Williams ("Respondent") that the Director intended to assess a civil penalty on Respondent 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,

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and Notice of Right to Judicial Appeal.

FINDINGS OF FACT

The Director FINDS that:

1. Respondent is a resident of the State of Florida whose address is located at 1459 Parkwood St., Clearwater, FL 33755.

2. Respondent's National Association of Insurance Commissioners ("NAIC") national producer number is 16401853, and she was first licensed as an Oregon non-resident insurance producer on October 25, 2011.

3. On or about February 20, 2025, the Division received a notice of termination for cause from Devoted Health Plans ("Devoted"), claiming that Respondent had enrolled a beneficiary without consent. Devoted noted that its investigation of Respondent found that Respondent did not conduct a compliant sales presentation and enrollment for the beneficiary, which appears to have caused the beneficiary confusion as to what exactly he was enrolling in. Devoted also found that Respondent displayed willful disregard for the beneficiary's request that their coverage not be changed.

4. On or about December 20, 2024, Devoted received a complaint filed by an Oregon consumer who shall hereinafter be referred to as "PM". PM alleged that Respondent had changed his health insurance plan without his permission, instigating Devoted's investigation into Respondent. In reviewing call recordings from Respondent's third-party marketing organization, GoHealth, Devoted found that Respondent spoke with PM because he wanted a food card benefit. PM repeatedly noted that he did not want to change his health plan. Respondent claimed PM did not meet the criteria for a plan with a food allowance, but Respondent did tell PM that he was eligible for a plan with Devoted that provided a Part B Giveback of cash that could be used for groceries. Devoted subsequently found that Respondent did not properly capture the Scope of Appointment, nor did Respondent conduct a proper suitability assessment to identify PM's needs and

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wants. Devoted also found that Respondent did not review the plan's benefits with PM, that PM expressed that he did not understand the plan information Respondent presented, that Respondent failed to properly address the confusion, and that Respondent made misleading statements to PM. Accordingly, Devoted terminated Respondent.

5. The Division conducted its own investigation based on PM's complaint and Devoted's findings. The Division determined that Respondent failed to properly communicate the new plan's benefits with PM and failed to identify and address PM's confusion and concern. Though the Division determined there is no evidence to suggest Respondent intentionally enrolled PM in a plan against his wishes, Respondent did not properly inform PM of the differences in the plans and misled PM about the plan's benefits. Respondent has no prior disciplinary history with the Division.

CONCLUSIONS OF LAW

The Director CONCLUDES that:

6. 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.

7. Pursuant to ORS 744.074(1)(e), the Director may suspend, revoke, or refuse to issue or renew an insurance producer license if a licensee intentionally misrepresents the terms of an actual or proposed insurance contract or application for insurance.

8. Pursuant to ORS 744.074(1)(h), the Director may suspend, revoke, or refuse to issue or renew an insurance producer license if a licensee uses fraudulent, coercive or dishonest practices, untrustworthiness, or financial irresponsibility in the conduct of business.

9. Respondent violated ORS 744.074(1)(e) and (h) by misrepresenting the terms of the insurance contract and engaging in dishonest practices or demonstrating

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incompetence in the conduct of business.

10. Pursuant to ORS 731.988(1), the Director may assess a civil penalty against Respondent of up to $1,000 per violation of the Insurance Code.

ORDERS

The Director issues the following ORDERS:

Order to Cease and Desist

11. Pursuant to ORS 731.252(1), the Director hereby ORDERS Respondent to CEASE AND DESIST from violating any provision of the Insurance Code, or any administrative rule adopted by the Director under those statutes.

Order Assessing Civil Penalty

12. Pursuant to ORS 744.074(1)(b), the Director hereby ORDERS Respondent to pay a civil penalty of $1,000 for violating ORS 744.074(1)(e) and (h).

FINAL ORDER

13. 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 31st day of March, 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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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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