

SEP 23 2026

BEFORE THE DEPARTMENT OF INSURANCE
STATE OF NEBRASKA

FILED

STATE OF NEBRASKA	)	
DEPARTMENT OF INSURANCE,	)	CONSENT ORDER
	)	
PETITIONER,	)	
	)	
VS.	)	
	)	
WILLIAM RUSSELL	)	CAUSE NO. A-2597
(NAIC Producer #6093908),	)	
	)	
RESPONDENT.	)	

In order to resolve this matter, the Nebraska Department of Insurance ("Petitioner"), by and through its attorney, Michael W. Anderson, and William Russell ("Respondent"), by and through his attorney, Steven M. Delaney, mutually stipulate and agree as follows:

JURISDICTION

1. Petitioner has jurisdiction over the subject matter and Respondent pursuant to Neb. Rev. Stat. §§ 44.101.01, and 44-4047 to 44-4067.

2. Respondent has been licensed as a resident insurance producer under the laws of Nebraska at all times material hereto.

3. Pursuant to Neb. Rev. Stat. §44-4059(1)(h), the director may suspend, revoke, or refuse to issue or renew an insurance producer's license or may levy an administrative fine against a producer for "...demonstrating incompetence... in the conduct of business in this state or elsewhere".

STIPULATIONS OF FACT

1. Respondent is alleged to have violated Neb. Rev. Stat. §§ 44-4059 (1) (h) as follows:

- a. On March 13th, 2026, a termination for cause notice concerning the Respondent was forwarded to Petitioner's Office, which included allegations that Respondent had enrolled members without their knowledge or consent.
- b. On March 24th, 2026, Petitioner's Office received the contents of an investigative file supporting the termination for cause. This file included documentation of statements made by the Respondent, in which he confirmed that he had submitted five (5) enrollments despite not having spoken to any of the beneficiaries.
- c. These actions constitute incompetence in the conduct of insurance business.

CONCLUSIONS OF LAW

Respondent's conduct as alleged above constitutes violations of Neb. Rev. Stat. §§ 44-4059 (1)(h), and Respondent is subject to disciplinary action pursuant to Neb. Rev. Stat. §44-4059.

CONSENT ORDER

It is therefore Ordered by the Director of Insurance and agreed by Respondent that:

1. Respondent agrees to pay an administrative penalty of \$1,000 within 60 days of the execution of this Consent Order.
2. Respondent agrees to continuing education and compliance training, including:
 - a. Medicare Advantage/PDP marketing and enrollment compliance training;
 - b. training on scope-of-appointment requirements;
 - c. training on documentation and record-retention practices.

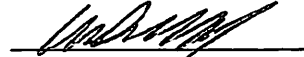
3. Respondent agrees to provide attestation to Petitioner's Office confirming that Respondent has completed the required training modules before his next licensing renewal on February 29, 2028.
4. Respondent shall prepare and implement written compliance procedures requiring Respondent to:
 - a. Obtain and retain a valid scope of appointment before any Medicare plan, discussion or enrollment, as applicable;
 - b. Submit Medicare enrollments only after a compliant face-to-face meeting, telephonic recorded enrollment, or other carrier/CMS-approved process;
 - c. Document the date, method, and substance of each beneficiary contact; cross-check any commission statement or carrier list against his own client database before submitting any enrollment;
 - d. confirm beneficiary status and consent before submission;
 - e. retain supporting documentation for audit.
5. The Nebraska Department of Insurance shall retain jurisdiction of this matter for the purpose of enabling Respondent or the Department of Insurance to make application for such further orders as may be necessary should Respondent fail to pay the aforementioned penalty or take the aforementioned actions.

In witness of their intention to be bound by this Consent Order, each party has executed this document by subscribing their signatures below.



Michael W. Anderson, #25671
Attorney for Petitioner
1526 K Street, Suite 200
Lincoln NE 68509
(402) 471-2201

9/23/2024
Date

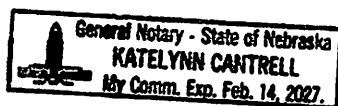


William Russell
Respondent

9/21/26
Date

State of Nebraska)
County of Sarpy) ss.

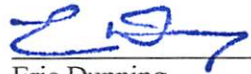
On this 21 day of September, 202⁶7, William Russell personally appeared before me and read this Consent Order, executed the same, and acknowledged the same to be his voluntary act and deed.


Notary Public

CERTIFICATE OF ADOPTION

I hereby certify that the foregoing Consent Order is adopted as the Final Order of the Nebraska Department of Insurance in the matter of State of Nebraska Department of Insurance vs. William Russell (NAIC National Producer #6093908), Cause No. A-2597.

STATE OF NEBRASKA
DEPARTMENT OF INSURANCE



Eric Dunning
Director of Insurance

9/23/26
Date

CERTIFICATE OF SERVICE

I hereby certify that a copy of the foregoing Consent Order was served upon Respondent by mailing a copy to his registered mailing address of 7614 Overview St, Papillion, Nebraska 68046, by regular U.S. mail, and via email to his attorney at Steve@rmdlaw.net, on this 23rd day of September, 2026.

