

**STATE OF NEW HAMPSHIRE
INSURANCE DEPARTMENT**

**In Re: Eusoh, Inc.
Docket No.: Ins. No. 22-018-EP**

CONSENT ORDER

This Consent Order is made between the New Hampshire Insurance Department (“NHID”) and Eusoh, Inc. (“Respondent”), the terms of which are as follows:

FINDINGS OF FACT

1. Respondent is a foreign corporation incorporated under the laws of Delaware and headquartered in California.
2. Respondent is not licensed as an insurance company in New Hampshire.
3. Respondent markets, solicits, and administers pet coverage plans in New Hampshire through a digital platform by which consumers pay a fee to Respondent and share pet care expenses amongst members of Respondent’s platform.
4. Respondent has only two active consumers in New Hampshire; Respondent has not received any complaints from New Hampshire consumers about its service.
5. Upon initiation of this action, Respondent worked cooperatively with the Department in an effort to resolve the above identified issues.

CONCLUSIONS OF LAW

Based on the foregoing Findings of Fact and the applicable provisions of law, the NHID concludes and finds the following Conclusions of Law:

- a. Respondent consents to the jurisdiction of the NHID;
- b. The NHID asserts that Respondent violated NH RSA 406-B:3 by operating as an unlicensed insurance company; and

- c. Respondent neither admits nor denies the NHID's assertion of violations of law.

ORDER

WHEREFORE, the NHID orders and Respondent consents to the following:

- a. The Respondent waives all rights to a formal administrative hearing in this matter and agrees that this Consent Order shall have the full force and effect of an Order fully entered in accordance with the adjudicatory procedure provided for in RSA Chapter 541-A and Ins Part 200.
- b. For the purposes of resolving this matter without a formal administrative hearing, Respondent agrees to the following:
 - i. To cease operations in the state on or about September 28, 2022.
- c. In the event that Respondent fails to meet any of the terms set forth in this section, the NHID may institute further administrative proceedings under the authority of RSA 400-A:15, III or any other applicable law.
- d. By entering into this Consent Order, the NHID and the Respondent intend to fully resolve all issues relating to the above-mentioned matters. This Consent Order shall be deemed a complete settlement and full and final resolution and is in lieu of any other action(s) that has and could have been brought by the NHID relating to these matters. Provided however, notwithstanding the foregoing, the NHID may take any and all appropriate actions should the Respondent violate any provision of the State's insurance laws in the future.

e. This Consent Order shall be fully enforceable in any Superior Court in the State of New Hampshire, and any actions to enforce this Consent Order shall be governed by the laws of the State of New Hampshire.

IT IS SO ORDERED.


NEW HAMPSHIRE INSURANCE DEPARTMENT

Date: 9/13/2022



Christopher Nicolopoulos, Commissioner

Date: September 13, 2022

 Allen Kamrava, CEO

Authorized Representative for
Eusoh, Inc., Respondent