



STATE OF NEVADA
DEPARTMENT OF BUSINESS AND INDUSTRY
DIVISION OF INSURANCE

IN THE MATTER OF:

Cause No. **26.0028****MITCHELL INTERNATIONAL, INC.,**

CONSENT AGREEMENT AND ORDER

Respondent.

The State of Nevada, Department of Business and Industry, Division of Insurance (“Division”), by and through its undersigned counsel, Dave M. Brown, Esq., Insurance Counsel, and Respondent MITCHELL INTERNATIONAL, INC. (“MITCHELL”), have mutually agreed and determined to make informal disposition of Cause Number 26.0028, by Consent Agreement and Order (“Consent Agreement”).

WHEREAS:

1. MITCHELL acknowledges that the Commissioner of Insurance (“Commissioner”) has exclusive jurisdiction to regulate the business of insurance in the state of Nevada, including these matters; and

2. MITCHELL acknowledges that the Commissioner will retain jurisdiction over these matters until all terms and conditions set forth in this Consent Agreement have been met to the satisfaction of the Commissioner; and

3. MITCHELL acknowledges that the Division's investigation revealed that RESPONDENT violated provisions of the Nevada Insurance Code, as set forth herein; and

4. MITCHELL has been fully informed by the Division of the allegations in Cause Number 26.0028, in satisfaction of the notice requirements of Nevada Revised Statutes (“NRS”) 233B.121(1)¹, and wishing to comply with the Nevada laws and resolve all issues upon the terms and conditions set forth in this Consent Agreement, and to avoid the time and expense involved in a formal administrative enforcement hearing, waives its right to an administrative hearing and

¹ Nevada Revised Statutes are available online at <https://www.leg.state.nv.us/NRS/>

1 the requirement for findings of fact and conclusions of law under NRS 233B.121(5); and

2 5. MITCHELL had the opportunity to consult with legal counsel of their choosing
3 concerning these matters.

4 **NOW, THEREFORE**, it is hereby **STIPULATED and AGREED** that:

5 1. MITCHELL admits the facts and violations of law as stated herein.

6 2. MITCHELL does not currently hold a Third-Party Administrator Certificate of
7 Registration (“CoR”) in Nevada.

8 3. On February 21, 2025, MITCHELL submitted a TPA-5 Pharmacy Benefits
9 Manager Certification of Registration application to the Division (“Application”).

10 4. As part of the application process, the Division opened an investigation regarding
11 MITCHELL’s activity in Nevada. As part of this investigation, it was determined that
12 MITCHELL administered a significant number of prescription claims, including Auto, Accident
13 & Health and Worker’s Compensation, on behalf of multiple insurers or clients, without holding
14 a valid Third-Party Administrator Certificate of Registration in Nevada, as required by NRS
15 683A.025 and NRS 683A.085.

16 5. Due to MITCHELL’s unlicensed administration of claims, MITCHELL’S
17 Application was put on hold pending the outcome of the Division’s investigation.

18 6. MITCHELL admits that its administration of prescription claims without a valid
19 CoR resulted in multiple violations of NRS 683A.085.

20 Based on the foregoing, **IT IS HEREBY AGREED and ORDERED** that, pursuant to
21 the Commissioner’s authority in NRS 683A.0893:

22 1. MITCHELL agrees to pay an administrative fine in the total amount of two
23 thousand dollars (\$2,000.00), within twenty (20) business days of the date on which the
24 Commissioner signs this Consent Order (“Order”).

25 2. Upon entry of this Order and proof of timely payment of the above listed
26 administrative fine, the Division will proceed with review of MITCHELL’S currently pending
27 Application for a TPA-5 Pharmacy Benefits Manager Certification of Registration.

28 3. MITCHELL acknowledges that if the administrative fine is not paid when due,

1 the Division will deny MITCHELL's currently pending Application.

2 4. MITCHELL acknowledges that this administrative action will be reported to the
3 National Association of Insurance Commissioners ("NAIC").

4 5. MITCHELL acknowledges it may have additional reporting requirements in
5 other jurisdictions in which it is licensed.

6 6. MITCHELL agrees to strictly comply with the terms of this Consent Agreement
7 and all Nevada statutes and regulations. Any non-compliance will constitute a violation of an
8 order of the Commissioner and may result in further administrative action by the Division.

9 7. MITCHELL acknowledges that this Consent Agreement does not provide or
10 afford any immunity for the violations of the Nevada Insurance Code and the corresponding
11 regulations, not part of Cause Number 26.0028.

12 8. MITCHELL agrees that once this Consent Agreement is signed by the
13 Commissioner, this Consent Agreement becomes the final Order of the Commissioner.

14 DATED this 25th day of June 2026.

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16 NEVADA DIVISION OF INSURANCE

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18 By: Alexander J. Hinman For Dave M.
19 DAVE M. BROWN, ESQ. Brown
20 Insurance Counsel
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1 **CONSENT TO AGREEMENT**

2 RESPONDENT MITCHELL INTERNATIONAL, INC. hereby consents to the terms of
3 it and agrees to comply with the contents of this Consent Agreement, Cause Number 26.0028,
4 without contesting the matter in an administrative hearing, in the courts of Nevada, or in any
5 other jurisdiction, as though a formal hearing had been held in accordance with the provisions
6 of the Nevada Revised Statutes.

7 DATED this 23 day of JUNE 2026.

8 **AUTHORIZED REPRESENTATIVE OF**
9 **MITCHELL INTERNATIONAL, INC.**

10 By: SKROON
11 Signature
12 STEPHANIE KROON
13 Printed Name
14 SECRETARY
15 Title

16 **ACKNOWLEDGEMENT**

SEE ATTACHED

17
18 STATE OF _____)
19 COUNTY OF _____) ss.

20 On this _____ day of _____ 2026, personally appeared before me,
21 _____, personally known to me or proved on the basis of
22 satisfactory evidence to be the person whose signature is affixed to the foregoing Consent to
23 Agreement, who acknowledged to me that he/she executed the same freely and voluntarily and
24 for the uses and purposes therein described.

25
26 _____
27 NOTARY PUBLIC in and for
28 said County and State.

ACKNOWLEDGMENT

A notary public or other officer completing this certificate verifies only the identity of the individual who signed the document to which this certificate is attached, and not the truthfulness, accuracy, or validity of that document.

State of California
County of San Diego

On June 23, 2026 before me, Vanessa L. Pothier, Notary Public
(insert name and title of the officer)

personally appeared Stephanie Kroon,
who proved to me on the basis of satisfactory evidence to be the person(s) whose name(s) is/are subscribed to the within instrument and acknowledged to me that he/she/they executed the same in his/her/their authorized capacity(ies), and that by his/her/their signature(s) on the instrument the person(s), or the entity upon behalf of which the person(s) acted, executed the instrument.

I certify under PENALTY OF PERJURY under the laws of the State of California that the foregoing paragraph is true and correct.

WITNESS my hand and official seal.

Signature  (Seal)



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ORDER OF THE COMMISSIONER

The terms described in this Consent Agreement, Cause Number 26.0028, are acceptable and adopted as the final Order in this matter.

SO ORDERED this 26th day of June 2026.

NEVADA DIVISION OF INSURANCE

By: 
NED GAINES
Commissioner of Insurance

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CERTIFICATE OF SERVICE

I hereby certify that I have this day served the **CONSENT AGREEMENT AND ORDER** in the matter of **CAUSE NO. 26.0028**, by sending a true and correct copy thereof via Electronic Mail only, to the following:

Zachary T. Steadman
MITCHELL, WILLIAMS, SELIG, GATES & WOODYARD, P.L.L.C.
425 W. Capitol Ave., Ste. 1800
Little Rock, AR 72201
Email: zsteadman@mwlaw.com

DATED this 26th day of June 2026.

/s/ Rhonda Kelly
Employee of the State of Nevada
Department of Business and Industry
Division of Insurance