

No. **2026-10109**

**Official Order
of the
Texas Commissioner of Insurance**

Date: 09/10/2026

Subjects Considered:

Juan Sebastian Borja
Frisco, Texas 75035

All Steps Insurance Services LLC.
12700 Hillcrest Rd. Ste 125
Dallas, Texas 75230-2009

Consent Order
TDI Enforcement File No. 37716 and 37815

General remarks and official action taken:

This is a consent order with Juan Sebastian Borja and All Steps Insurance Services LLC. (Respondents). Respondents failed to return unearned commissions to a premium finance company and engaged in premium conversions that affected two consumers. This order suspends Respondents' licenses subject to the terms of a one-year probated suspension detailed in the order and imposes a monetary penalty of \$2,500.

Waiver

Respondents acknowledge that the Texas Insurance Code and other applicable law provide certain rights. Respondents waive all of these rights, and any other applicable procedural rights, in consideration of the entry of this consent order.

Findings of Fact

1. Juan Sebastian Borja (Borja) holds a General Lines Agent License with a Property and Casualty qualification issued on July 9, 2019.

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2. All Steps Insurance Services, LLC., (All Steps) holds a General Lines Agency license with a Property and Casualty qualification issued on April 13, 2021.
3. On March 19, 2025, TDI received a complaint submitted by Novatae Premium Finance (Novatae), which alleged that Respondents had failed to pay unearned commissions owed to Novatae. Novatae requested that Respondents be required to pay the \$3,565 owed in unearned commissions.
4. On August 15, 2025, TDI received a complaint submitted by E.M., an individual consumer, who alleged that Respondents took premium payments for E.M.'s trucking insurance policy and failed to apply those payments to the policy. E.M. had received notification in June 2025 that his policy was to be canceled due to nonpayment.
5. On October 2, 2025, N.B.D.'s policy was canceled due to non-payment by Respondents, and N.B.D independently paid for a new policy including a penalty for being uninsured when his initial policy had been canceled.
6. On October 7, 2025, TDI received a complaint submitted by N.B.D., an individual consumer, who alleged that Respondents took payments for a commercial auto policy and failed to apply those payments to the policy. N.B.D. received notification on May 12, 2025, and September 2, 2025, that his policy would be canceled due to non-payment.

Mitigating Circumstances

7. Respondents assert that their failure to timely repay unearned commissions to Novatae and apply payments to the above consumer's policies was due to unexpected cancellations and accounting errors. Respondents initiated payment plans with all affected parties and are making changes to internal processes to prevent these issues in the future.
8. On March 17, 2026, Respondents made five payments totaling \$3,565 to Novatae.
9. Between December 2025 and March 2026, Respondents made four payments totaling \$7,766 owed to N.B.D.
10. Between December 2025 and January 2026, Respondents made two payments totaling \$2,006 owed to E.M.

11. As of this writing, Respondents have satisfied their payment obligations towards the three complainants: Novatae, N.B.D., and E.M.

Conclusions of Law

1. The commissioner has jurisdiction over this matter under TEX. INS. CODE §§ 82.051–82.055, 84.021–84.044, 4001.002, 4005.101, 4005.102, and 4051.051; TEX. OCC. CODE §§ 53.021-53.023; 28 TEX. ADMIN CODE § 1.502; and TEX. GOVT. CODE §§ 2001.051-2001.178.
2. The commissioner has the authority to informally dispose of this matter as set forth in TEX. GOV'T CODE § 2001.056, and TEX. INS. CODE §§ 36.104 and 82.055.
3. Respondents have knowingly and voluntarily waived all procedural rights to which they may have been entitled regarding the entry of this order, including, but not limited to, issuance and service of notice of intention to institute disciplinary action, notice of hearing, a public hearing, a proposal for decision, rehearing by the commissioner, and judicial review.
4. Respondents misappropriated, converted to their own use, or illegally withheld money belonging to an insured, enrollee, or beneficiary as contemplated by TEX. INS. CODE § 4005.101(b)(4)
5. Borja engaged in fraudulent and dishonest acts or practices, in violation of TEX. INS. CODE § 4005.101(b)(5).
6. After an insurance policy was properly canceled by the premium finance company, Respondents failed to return unearned commissions to the premium finance company before the 91st day after cancellation in accordance with TEX. INS. CODE § 651.162(c).

Order

It is ordered that all licenses belonging to Juan Sebastian Borja and All Steps Insurance Services LLC., are suspended for one year, probated.

If, during this probation period imposed by this order, TDI issues additional licenses or authorizations to Juan Sebastian Borja or All Steps Insurance Services LLC, all additional

licenses or authorizations will be suspended until the probation period imposed by this order has ended. The suspension shall be probated and the same terms and conditions stated in this order will apply

Beginning from the date of this order and continuing through the probation period, Juan Sebastian Borja and All Steps Insurance Services LLC., must file a written report, on or before the 15th day of the month on a quarterly basis for the months of June, September, December, and March with TDI by emailing the report to, EnforcementReports@tdi.texas.gov. The reports must include the following information:

- a. Juan Sebastian Borja and All Steps Insurance Services LLC's current mailing address and telephone number;
- b. the name and address of any insurer or entity which has appointed Juan Sebastian Borja and All Steps Insurance Services LLC., as an agent or agency;
- c. the name and address of any insurer or entity which has terminated Juan Sebastian Borja and All Steps Insurance Services LLC., contract;
- d. a copy of all contracts Juan Sebastian Borja and All Steps Insurance Services LLC., have entered into with an insurer, broker, managing general agent, managing general agency, or any person or entity in the business of insurance.

Juan Sebastian Borja and All Steps Insurance Services LLC., must notify TDI immediately of the following by emailing EnforcementReports@tdi.texas.gov:

- a. any charges filed against Juan Sebastian Borja and All Steps Insurance Services LLC., for misdemeanor or felony crimes during the period he is required to file reports, excluding Class C misdemeanors and traffic offenses;
- b. any state or regulatory actions taken against Juan Sebastian Borja and All Steps Insurance Services LLC., including formal and informal actions;
- c. any complaints made against Juan Sebastian Borja and All Steps Insurance Services LLC., concerning their performance related to the business of insurance, as well as a written explanation detailing the steps taken to resolve the complaint.

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It is further ordered that Juan Sebastian Borja and All Steps Insurance Services LLC., must pay, jointly and severally, a penalty of \$2,500 within 30 days from the date of this order. This penalty must be paid as instructed in the invoice, which the department will send after the entry of this order.

Signed by:

Amanda Crawford

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Amanda Crawford

Commissioner of Insurance

Recommended and reviewed by:

Leah Gillum

Leah Gillum, Deputy Commissioner
Fraud and Enforcement Division

Priya Subramanian

Priya Subramanian, Staff Attorney
Enforcement

Affidavit

STATE OF Texas §
COUNTY OF Collin §

Before me, the undersigned authority, personally appeared Juan Sebastian Borja, who being by me duly sworn, deposed as follows:

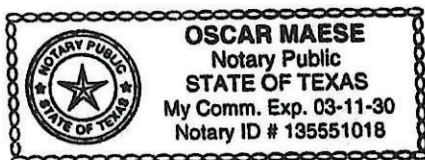
"My name is Juan Sebastian Borja. I am of sound mind, capable of making this statement, and have personal knowledge of these facts which are true and correct.

I have knowingly and voluntarily entered into the foregoing consent order and agree with and consent to the issuance and service of the same by the commissioner of insurance of the state of Texas."


Affiant

SWORN TO AND SUBSCRIBED before me on July 24th ^{om} 2026.

(NOTARY SEAL)




Signature of Notary Public

Oscar Maese
Printed Name of Notary Public

Affidavit

STATE OF Texas §

COUNTY OF Collin §

Before me, the undersigned authority, personally appeared Juan Sebastian Borja, who being by me duly sworn, deposed as follows:

"My name is Juan Sebastian Borja. I am of sound mind, capable of making this statement, and have personal knowledge of these facts which are true and correct.

I hold the office of Owner and am the authorized representative of All Steps Insurance Services, LLC. I am duly authorized by said organization to execute this statement.

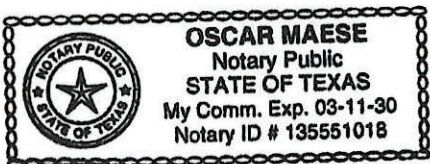
All Steps Insurance Services, LLC., has knowingly and voluntarily entered into the foregoing consent order and agrees with and consents to the issuance and service of the same by the commissioner of insurance of the State of Texas."



Affiant

SWORN TO AND SUBSCRIBED before me on July 24th, 2026.

(NOTARY SEAL)





Signature of Notary Public

Oscar Maese

Printed Name of Notary Public