

Winter-Spring 2025

Taking Action



Department of
Consumer and
Business Services



To protect consumers and promote a healthy business climate

Taking Action is a quarterly publication of the Oregon Division of Financial Regulation (DFR) and includes summaries of the final orders issued by the division. Below are orders issued from the first two quarters of 2025.

Insurance



- **CHW Group Inc., dba Choice Home Warranty, and American Global Obligors Inc.,** [INS-24-0056](#) – DFR issued a cease-and-desist order against CHW Group Inc., doing business as Choice Home Warranty, and American Global Obligors Inc., for failing to act in good faith in providing covered services under home warranty service contracts. Specifically, the companies offered insufficient cash payments instead of repairs or replacements, failed to timely assign qualified service providers, caused excessive delays in providing services, and failed to administer its reimbursement program in a fair, transparent, or reliable manner. These actions violated the terms of a previous consent order (refer to [INS-22-0058](#)). In addition to the cease-and-desist order, DFR fined the companies \$59,000 and reinstated \$69,000 in previously suspended penalties. The companies also agreed to pay \$30,000 in restitution to the Oregon consumers affected by their business practices, and to make numerous changes to the terms of their Oregon service contracts to address the preceding deficiencies.
- **Continental Casualty Company, et al.,** [INS-24-0044](#) – DFR issued a cease-and-desist order against Continental Casualty Company; Continental Insurance Company; Transportation Insurance Company; American Casualty Company of Reading, Pennsylvania; Valley Forge Insurance Company; and National Fire Insurance Company of Hartford (collectively, CNA Insurance Group) and fined the companies \$58,175 for failing to send claimants the required Oregon total loss notice for cash settlements, failing to provide the full valuation report it used to determine the cash settlement amounts, and failing to pay all applicable taxes and fees incident to the transfer of ownership on total loss claims. As a result of DFR’s investigation, CNA reimbursed claimants the almost \$35,000 in taxes and fees it should have initially paid as part of the claims settlement process.
- **Health Plan Intermediaries Holdings LLC, et al.,** [INS-23-0068](#) – DFR issued a cease-and-desist order against Health Plan Intermediaries Holdings LLC, doing business as Health Insurance Innovations, American Service Insurance Agency LLC, Healthinsurance.com LLC, Healthpocket Inc., TogetherHealth Insurance LLC, Total Insurance Brokers LLC, and Benefytt Technologies Inc. for using fraudulent, coercive, or dishonest practices, or demonstrating incompetence, untrustworthiness, or financial irresponsibility in the conduct of business in this state or elsewhere. Additionally, DFR’s investigation found that Health Plan Intermediaries Holdings LLC and its parent company, Benefytt Technologies Inc., transacted business as a third-party administrator without holding a license issued by DFR. In addition to the cease-and-desist order, DFR denied the third-party administrator license application of Health Plan Intermediaries Holdings, and revoked the

insurance producer licenses held by American Service Insurance Agency, Healthinsurance.com, Healthpocket, TogetherHealth Insurance, and Total Insurance Brokers. Lastly, DFR imposed a \$50,000 fine against Health Plan Intermediaries Holdings and Benefytt Technologies.

- **Matthew Minahan and Compass Insurance Services LLC, [INS-24-0046](#)** – DFR issued a cease-and-desist order against insurance producer Matthew Minahan and his entity producer business, Compass Insurance Services LLC, for failing to ensure their clients maintained active policies, failing to timely refund premium funds, and making inaccurate entries on the Oregon Construction Contractors Board database to give the false impression that their clients had active policies. In addition to the cease-and-desist order, DFR fined Minahan and Compass Insurance Services \$30,000 and suspended their insurance producer licenses for nine months.
- **Michael Jerry Cross, [INS-23-0072](#)** – DFR issued an order denying the insurance producer license application of Michael Jerry Cross because the application was incomplete, and because Cross had previously been convicted of a crime involving dishonesty or breach of trust. Cross' 1997 conviction related to financial exploitation and misappropriation of money from an elderly woman in his care.
- **Ove S. Arvidson and Ove Arvidson Inc., dba Skandia Northwest Insurance, [INS-24-0075](#)** – DFR issued a cease-and-desist order and reinstated \$60,000 in previously suspended civil penalties against Ove S. Arvidson and Ove Arvidson Inc., doing business as Skandia Northwest Insurance. In June 2024, Arvidson and Skandia Northwest entered into a consent order with DFR to resolve a previous enforcement action ([INS-23-0065](#)). Under the terms of that order, DFR revoked Arvidson's license, and Arvidson agreed to pay \$21,103.30 in restitution to one of his former insurance clients, the total amount misappropriated by Arvidson. Arvidson failed to pay the restitution,

and, as a result, DFR took this follow-up enforcement action to reinstate \$60,000 in suspended civil penalties against Arvidson and Skandia Northwest.

- **Richard Sweet and Vantage Point Risk Partners LLC, [INS-24-0072](#)** – DFR issued a cease-and-desist order against Richard Sweet and his insurance agency, Vantage Point Risk Partners, for failing to timely refund a consumer's premium payment, failing to respond to DFR's inquiries, failing to maintain a premium trust account, and failing to maintain a licensed designated responsible licensed producer for the agency. An Oregon consumer paid Sweet the premium for a commercial insurance policy and shortly later requested to cancel it. Sweet never bound that policy, and instead used the consumer's funds to pay business expenses. Sweet failed to respond to several of DFR's inquiries about this matter. In addition to the cease-and-desist, DFR suspended Sweet's license for five months, placed the agency's license on probation for 12 months, and fined Sweet \$10,000.
- **Mikeline Rene, [INS-25-0002](#)** – DFR issued a cease-and-desist order against and revoked the nonresident insurance producer license of Mikeline Rene for failing to respond to DFR's inquiries relating to a complaint alleging Rene had enrolled a consumer with Alzheimer's disease in a policy that was not appropriate for her needs.
- **GBU Financial Life, [INS-24-0082](#)** – DFR issued a cease-and-desist order against GBU, a fraternal benefit society, for transacting insurance without a certificate of authority between 2012 and 2023, and issuing 26 insurance policies in Oregon during that time frame. In addition to the cease-and-desist order, DFR fined GBU \$60,000. GBU has since obtained a certificate of authority to transact insurance in Oregon.
- **Employee Benefit Management Services LLC, [INS-24-0077](#)** – DFR issued a cease-and-desist order and fined Employee Benefit Management Services LLC \$1,000 for failing to timely file the 2023 annual report required of licensed third-party administrators.

- **Global Claims Administration LLC,** [INS-24-0066](#) – DFR issued a cease-and-desist order and fined Global Claims Administration LLC \$1,000 for failing to timely file the 2023 annual report required of licensed third-party administrators.
- **Massmark Administrative Services Inc.,** [INS-24-0078](#) – DFR issued a cease-and-desist order and fined Massmark Administrative Services Inc. \$1,000 for failing to timely file the 2023 annual report required of licensed third-party administrators.
- **Partners Alliance Corporation,** [INS-24-0079](#) – DFR issued a cease-and-desist order and fined Partners Alliance Corporation \$1,000 for failing to timely file the 2023 annual report required of licensed third-party administrators.
- **Allstate Indemnity Company, et al** [INS-24-0050](#) – DFR issued a cease-and-desist order and fined Allstate Indemnity Company, Allstate Fire & Casualty Company, Allstate Insurance Company, and Allstate County Mutual Insurance Company (Allstate group) \$244,700 for failing to pay all applicable taxes, license fees, and other fees incident to transfer of ownership in 1,262 of 8,015 total loss claims between January 2020 and June 2022, and for failing to provide the required Oregon total loss notice at the time of settlement in 1,185 of 8,015 claims. During the course of DFR’s investigation, the Allstate group made full restitution to those consumers, with interest, for a total amount of \$40,833.11.
- **American Strategic Insurance Corp.,** [INS-24-0081](#) – DFR issued a cease-and-desist order and fined American Strategic Insurance Corp. \$290,000 for violations relating to notices the company sent consumers concerning the cancellation/nonrenewal of their homeowner insurance policies for reasons materially related to wildfire risk. In particular, the notices were not sent through DFR-approved forms and also failed to describe the property-specific characteristics that resulted in the company’s decision to cancel or decline to renew the policies. In addition, the company failed to respond to DFR inquiries regarding its notice violations. The company has remedied these past violations, and agreed to provide DFR with documentation detailing the measures or training it has implemented to prevent the recurrence of these violations.
- **Coast National Insurance Company,** [INS-24-0060](#) – DFR issued a cease-and-desist order and fined Coast National Insurance Company \$155,250 for excluding 621 Oregon consumers over a five-year period from auto policy coverage who were not eligible to be excluded, resulting in consumer harm due to increased rating factors. During the course of DFR’s investigation, Coast National provided \$116,408.50 in refunds to those consumers, and wrote off \$22,009.18 in pending balances due.
- **Shane M. Hillier and RoHillCo Insurance Services LLC,** [INS-24-0074](#) – DFR issued a cease-and-desist order and fined Shane Hillier and his company, RoHillCo Insurance Services LLC, \$5,500 for failing to timely refund an Oregon consumer’s premium payments, failing to respond or providing delayed, incomplete, or misleading responses to DFR’s inquiries, failing to ensure RoHillCo’s compliance with the licensing requirement that business entity insurance producers have a designated responsible licensed producer, and failing to update RoHillCo’s mailing address. As a result of DFR’s investigation, Hillier and RoHillCo refunded the consumer \$5,640 in premiums paid.
- **Marbely Adreina Yanconvich and Juan Gomez,** [INS-25-0010](#) – DFR issued a cease-and-desist order and fined Marbely Yanconvich and Juan Gomez \$4,830. Yanconvich and Gomez are not licensed insurance producers in Oregon or any other state and fraudulently sold insurance policies to three Oregon consumers, collecting \$830 in fraudulent premiums through their Zelle account. Yanconvich and Gomez falsely

claimed these policies were sold through Falcon Insurance Company, Christian Zaragoza, and Mok Insurance and Tax Services. Falcon Insurance, Zaragoza, and Mok Insurance were not, in fact, involved in the fraudulent scheme, and had previously reported the fraudulent activity to law enforcement and insurance regulators in Texas.

- **Charles Donisi, [INS-25-0001](#)** – DFR issued a cease-and-desist order and fined nonresident insurance producer Charles Donisi \$500 for failing to timely update his contact information with DFR after his former business ceased operations in August 2022. This failure resulted in delays in DFR’s investigation of a complaint filed by a consumer against Donisi.
- **Danielle Duncan, [INS-25-0049](#)** – DFR issued a cease-and-desist order and fined Danielle Duncan \$1,000 for failing to report her criminal background in her resident insurance producer license application. Each of Duncan’s convictions were for nonfiduciary, low-level crimes, and she mistakenly believed she had sealed her criminal record in 2023.
- **Janet Riley, [INS-25-0011](#)** – DFR issued a cease-and-desist order and revoked the nonresident insurance producer license of Janet Riley for failing to respond to DFR’s inquiries after she enrolled an Oregon consumer in a Washington health plan that did not meet her needs. The

consumer paid between \$10,000 and \$25,000 in travel expenses to Washington from Oregon for her health care needs.

- **John Thomas, [INS-25-0005](#)** – DFR issued a cease-and-desist order and revoked the nonresident insurance producer license of John Thomas for failing to identify a withheld criminal judgment in his original license application with DFR, and failing to identify or report other states’ administrative proceedings against him.
- **Paul Graham, [INS-25-0019](#)** – DFR issued a cease-and-desist order and fined nonresident insurance producer Paul Graham \$1,000 for mismanaging a client’s policy application and failing to request that the policy be bound. Graham is a wholesale broker that was serving as an intermediary between insurance producers and insurers. The affected consumer did not discover that the policy had not been bound until he attempted to file a claim. As a result of DFR’s order, Graham refunded the policy premium and filed a claim under his errors and omissions professional liability insurance coverage.
- **Landmark Admin LLC, [INS-25-0047](#)** – DFR issued a cease-and-desist order and fined Landmark Admin LLC \$1,000 for failing to timely file the annual report required of third-party administrators for 2024.



Mortgage



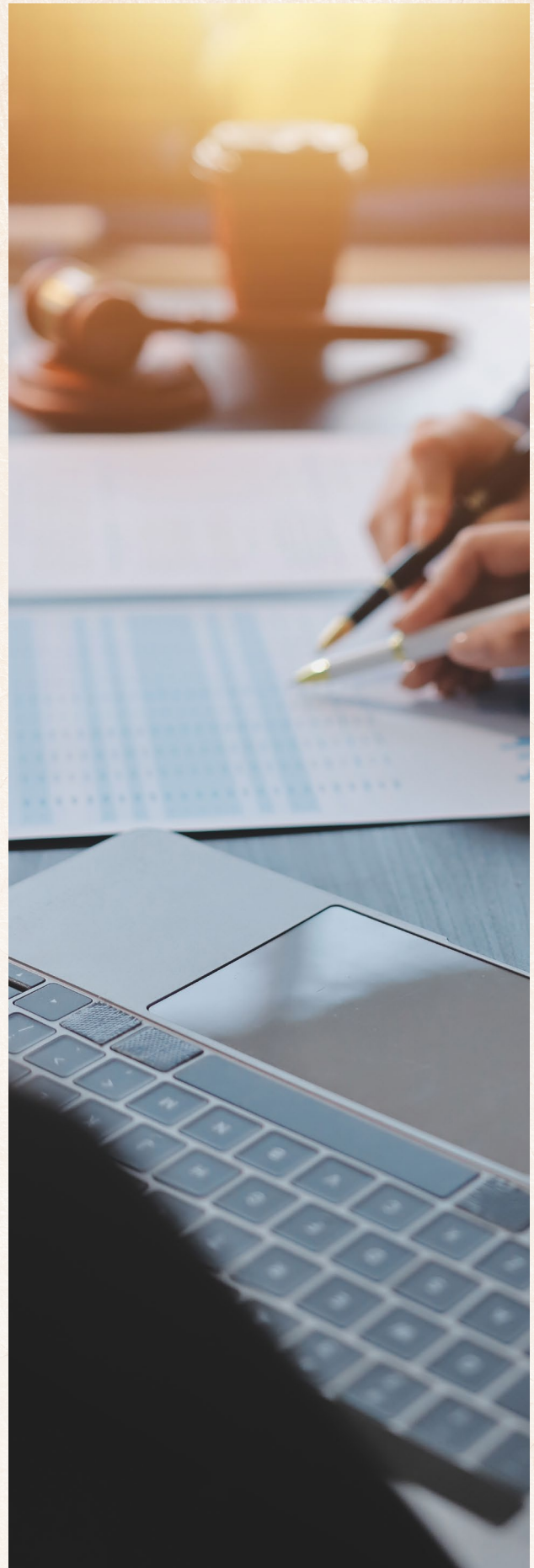
- **Javier Antonio Banelas Urueta and ConsoliDebt Solutions LLC, M-24-0054** – DFR issued a cease-and-desist order and terminated the mortgage loan originator license of Javier Banelas Urueta, who was the principal behind ConsoliDebt Solutions LLC. Banelas developed a scheme where he would refer mortgage loan clients with poor credit history to ConsoliDebt, which he claimed would help them improve their credit. ConsoliDebt was not registered with DFR as a debt management service provider, and in fact, did not even attempt to function as one. Banelas seemingly created ConsoliDebt solely to fraudulently obtain funds from victims. He also took part in illegal labor trafficking by inducing Mexican citizens to travel to Portland and Vancouver to work at ConsoliDebt fielding calls and taking payments from victims. DFR alerted and worked with Homeland Security Investigations and the U.S. Department of Justice on this case, which was able to secure multiple convictions against Banelas related to his activities, and obtain orders for restitution.
- **Lakeview Loan Servicing LLC, et al., M-24-0084** – DFR issued an order fining Lakeview Loan Servicing LLC, Pingora Loan Servicing LLC, Community Loan Servicing LLC, and Bayview Asset Management \$334,145 as related to a large-scale data breach that occurred in 2021. The order followed a multistate cybersecurity examination, which revealed that the companies had insufficient IT monitoring and reporting processes, and failed to encrypt personally identifiable information of their clients. The order requires the companies to comply with certain information security standards going forward, to hire outside an consultant, and to create and maintain an information security policy and incident response plan. The companies were fined almost \$20 million as a result of the multistate investigation and regulatory action, which was prorated to states based on the number of affected consumers.

Non-depository programs

- **Block Inc., fka Square Inc., MT-25-0004** – DFR and 47 other state financial regulatory agencies took coordinated enforcement action against Block Inc., which operates CashApp, for violations of the Bank Secrecy Act (BSA) and anti-money laundering (AML) laws that safeguard the financial system from illicit use. As part of the multistate settlement, Block agreed to pay an \$80 million penalty in total to the state agencies, hire an independent consultant to review the comprehensiveness and effectiveness of its BSA/AML program, and submit a report to the states detailing the findings of the independent review. The division issued a press release on the matter, which can be found [here](#).
- **Sigue Corporation, MT-24-0029** – DFR entered into a multistate settlement agreement and consent order with money transmitter licensee Sigue Corporation and its former CEO and majority owner, Guillermo de la Vina. Sigue ceased operations as a result of its deteriorating financial condition at the beginning of 2024. Under the consent order, Sigue voluntarily surrendered its money transmitter license and will cease-and-desist from all money transmission activity in this and every other participating state. Additionally, the order required Sigue to cooperate with and provide any necessary documents related to any bond claims filed by Oregonians who were still owed funds from outstanding Sigue transmissions. De la Vina is prohibited from acting as a control person or manager in a money transmission business again without prior DFR approval. Finally, Sigue was fined \$1 million, which is stayed for two years pending Sigue's compliance with certain provisions of the consent order.
- **National Tax Advisory Services LLC, aka Tax Relief Helpers LLC, DM-24-0045** – DFR issued a cease-and-desist order and fined National Tax Advisory Services \$124,000 for offering or providing tax debt settlement services to 18 Oregon consumers from March 2021 through October 2022 without being registered as a debt management service provider and charging them excessive fees. As a result of DFR's investigation, National Tax Advisory Services agreed to refund \$45,200 in fees to Oregon consumers.
- **Gallant Law Group PC, DM-24-0055** – DFR issued a cease-and-desist order and fined Gallant Law Group \$121,000 for performing unregistered debt management services to 104 Oregon consumers between 2022 and 2023, failing to provide those consumers with the required disclosures and charging excessive fees to 69 Oregon consumers.
- **The Litigation Practice Group PC, DM-23-0062** – DFR issued a cease-and-desist order against The Litigation Practice Group PC (LPG), which was providing unregistered debt management services to at least four Oregon consumers, failed to perform a budget analysis for consumers, charged excessive initial fees for services, and charged an excessive monthly fee for services. LPG, which purported to be a law firm offering debt relief legal services, is in a bankruptcy proceeding and the trustee is attempting to redistribute all of its assets to creditors and consumers. DFR also pursued enforcement action against LPG employee Tony Diab and LPG principal Daniel March, including issuing a cease-and-desist order and a \$80,000 fine for the same violations as LPG.
- **CA Enterprises, et al., DM-24-0062** – DFR issued a cease-and-desist order and fined CA Enterprises (doing business as Premier Services, Premier Legal Services, and Progressive Premier Group) and its principals Maik Georges Denno and Jescar Denno, \$35,000 for unlicensed mortgage broker

activity, unlicensed debt management service provider activities, and other related violations. The parties used mailers to solicit consumers for foreclosure avoidance services that were never provided. DFR fined CA Enterprises an additional \$35,000 for violating the cease-and-desist order that DFR issued against CA Enterprises for similar activities in 2021 ([DM-20-0051](#)).

- **Man Data Inc., dba Pacific Coast Credit, CA-24-0049** – DFR issued a cease-and-desist order and fined Man Data Inc., doing business as Pacific Coast Credit, \$307,500 for engaging in unregistered collections agency activity against 3,072 Oregon consumers when the company’s registration had lapsed from January 2021 through May 2022.
- **Aquarion Asset Management LLC, CA-24-0065** – DFR issued a cease-and-desist order and fined Aquarion Asset Management LLC and Tamika Bryant, also known as Tamika Williams, \$17,400 for unregistered collections agency activities. DFR received a complaint from an Oregon consumer that received debt collection calls, voice messages, and text messages from Aquarion Asset Management, which is not registered as a collection agency in Oregon. Aquarion collected \$5,200 from 17 Oregon consumers, and attempted to collect funds from an additional consumer that filed a complaint with DFR but did not pay Aquarion any money after learning it was not a registered collection agency.



Securities

- **Vanguard Marketing Corporation and The Vanguard Group Inc., S-25-0017** – DFR issued a cease-and-desist order and remediation payments against Vanguard Marketing Corporation and The Vanguard Group Inc., DFR found that Vanguard failed to adequately supervise certain registered persons and failed to disclose the tax consequences to investors following a change in investment minimums for certain target date retirement funds. DFR’s order stems from a three-year, multistate taskforce investigation coordinated through the North American Securities Administrators Association, which was run parallel to a concurrent investigation by the Securities and Exchange Commission (SEC). Those actions resulted in a \$106 million settlement that will be used to reimburse affected investors. The SEC will notify those investors and administer the remediation payments. DFR issued a press release regarding this matter, which can be found [here](#).
- **GBL Partners LLC and Aran DeFilippis, S-24-0041** – DFR issued a cease-and-desist order and fined GBL Partners LLC and Aran DeFilippis \$10,000 for failing to respond to several inquiries and a subpoena from the director of the Department of Consumer and Business Services (DCBS). DFR received a complaint from an Oregon consumer regarding GBL Partner’s possible participation in the sale of unregistered securities. The fine was issued pursuant to Oregon Revised Statutes (ORS) 59.245(2), which is a new provision to the Oregon Securities Law requiring persons to reply promptly and truthfully to an inquiry from the director of DCBS in relation to any matter connected directly or indirectly with an offer, purchase, or sale of any security, or the conduct of a securities business.
- **Blue Owl Credit Income Corp., S-25-0029** – DFR issued a cease-and-desist order and fined Blue Owl Credit Income Corp. \$100,000 for issuing securities to Oregon consumers after its order of registration with the division expired. DFR had previously issued an order against one of its affiliated issuers, Blue Owl Technology Income Corp., for similar violations in 2024 ([S-23-0057](#)).