

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 Division of Financial Regulation and includes summaries of the Final Orders issued by the division. Below are orders issued from the third quarter of 2022.

Insurance



- **Andrew M. Thomas, aka Andrew G. Klein, [INS-2019-0140](#)** – The division issued a cease-and-desist order and revoked the insurance producer license of Andrew M. Thomas, aka Andrew G. Klein, for violations of the Oregon securities law and the Insurance Code. Thomas offered and sold securities to two elderly sisters, claiming he was raising money to develop a computer program he was creating to assist in trading stocks. He also induced one of the sisters to liquidate an annuity to give him the money for that investment. Thomas modified the investment checks he received to reflect different dates, payees, and memo lines on the checks. Thomas never created the computer program or otherwise invested the money he received from the sisters, which totaled more than \$140,000. Instead, he used their money for personal expenses. In addition to the cease-and-desist and license revocation, the division fined Thomas \$208,050.
- **Jennifer I. Tovar Ches, [INS-21-0065](#)** – The division issued a cease-and-desist order against Jennifer I. Tovar Ches and barred her from being licensed as an insurance producer in Oregon for two years for engaging in dishonest, untrustworthy, or incompetent conduct. Tovar Ches entered inaccurate information in insurance applications, obtained discounts for ineligible clients, applied discounts without verifying her clients' eligibility, and increased bodily injury limits on certain policies so her clients could receive a better rating tier on other policies. In addition to the two-year bar, the division fined Tovar Ches \$11,500.
- **Girish Modgill and Pavandeep Kaur, [INS-22-0026](#)** – The division issued a cease-and-desist order and placed Girish Modgill and Pavandeep Kaur on probation for engaging in dishonest practices and demonstrating untrustworthiness in the conduct of business. Kaur took the insurance applications of two consumers but allowed her husband, Modgill, who worked at a different insurance agency and did not have any contact with the consumers, to sign the applications as the agent and bind the insurance policies with his identification. Modgill also failed to timely notify the division of a Washington state administrative action against him. In addition to probation, the division fined Modgill and Kaur \$5,000 each.
- **Thomas H. Morris, [INS-22-0050](#)** – The division issued a cease-and-desist order and denied the insurance producer license application of Thomas H. Morris for failing to disclose on his application that he had a felony deferred in California and that California had revoked his resident insurance producer license. The California felony – theft of funds by a fiduciary – involved Morris receiving premium payments totaling approximately \$189,000 from his insurance clients and diverting those funds to personal use rather than sending them to the insurance carrier.
- **Kenneth Washington, [INS-22-0021](#)** – The division issued a cease-and-desist order and fined Kenneth Washington \$500 for submitting a nonresident insurance producer license application that failed to disclose his

criminal history, and for failing to respond to the division's inquiries regarding the same. The division also denied Washington's nonresident insurance producer license renewal application and revoked his nonresident insurance producer license.

- **Americas Insurance Company, [INS-22-0055](#)** – The division issued a cease-and-desist order and revoked the certificate of authority of Americas Insurance Company for failing to timely file and pay its foreign retaliatory tax for the calendar year 2021. Americas Insurance Company never provided a substantive reply to multiple inquiries and reminders from the division. In addition to the certificate of authority revocation, the division fined the company \$10,000.
- **Clearcover Insurance Company, [INS-22-0054](#)** – The division issued a cease-and-desist order and fined Clearcover Insurance Company \$10,000 for failing to timely file and pay its foreign retaliatory tax for the calendar year 2021.
- **Concierge Administrative Services LLC, [INS-22-0065](#)** – The division issued a cease-and-desist order and revoked the third-party administrator license of Concierge Administrative Services, LLC for failing to file the annual report required for 2021. In addition to the license revocation, the division fined the company \$1,000 for its filing violation.
- **Covenant Administrators LLC, [INS-22-0067](#)** - The division issued a cease-and-desist order and fined Covenant Administrators LLC \$1,000 for failing to timely file the annual report required of third-party administrators in 2020 and 2021.
- **Professional Benefit Services Inc., [INS-22-0083](#)** – The division issued a cease-and-desist order and fined Professional Benefit Services Inc. \$2,000 for failing to timely file the annual report required of third-party administrators in 2020 and 2021.
- **Providence Plan Partners, [INS-22-0084](#)** – The division issued a cease-and-desist order and fined Providence Plan Partners \$2,000 for failing to timely file the annual report required of third-party administrators in 2020 and 2021.
- **DDI Admin LLC, [INS-22-0068](#)** – The division issued a cease-and-desist order and fined DDI Admin LLC \$1,000 for failing to timely file the annual report required of third-party administrators for 2021.
- **DAKOTACARE Administrative Services Inc., [INS-22-0070](#)** – The division issued a cease-and-desist order and fined DAKOTACARE Administrative Services Inc. \$1,000 for failing to timely file the annual report required of third-party administrators for 2021.
- **IISI Insurance Services Inc., [INS-22-0076](#)** – The division issued a cease-and-desist order and fined IISI Insurance Services Inc. \$1,000 for failing to timely file the annual report required of third-party administrators for 2021.
- **Lifeworks (US) Ltd., [INS-22-0072](#)** – The division issued a cease-and-desist order and fined Lifeworks (US) Ltd. \$1,000 for failing to timely file the annual report required of third-party administrators for 2021.
- **National Insurance Services of Wisconsin Inc., [INS-22-0074](#)** – The division issued a cease-and-desist order and fined National Insurance Services of Wisconsin Inc. \$1,000 for failing to timely file the annual report required of third-party administrators for 2021.



Securities and nondepository



- **Ganiyu Alogba, S-20-0031** – The division issued a cease-and-desist order against Ganiyu Alogba for materially aiding in a transaction involving securities fraud and the sale of unregistered securities. Alogba was one of several persons who served as intermediaries in a transaction in which an elderly Oregon consumer was persuaded to invest \$126,000 in a purported mining operation in Turkey. The Oregon investor, who was recently widowed, was lured into the investment through an online dating website. Alogba assisted the “money mules” in the fraudulent transactions by arranging for the exchange of U.S. dollars for Nigerian naira, thereby obscuring the flow of funds from the investor to the fraudster. In addition to the cease-and-desist order, the division fined Alogba \$45,000 and required him to pay \$3,000 in restitution.
- **Debt Pay Gateway Inc., MT-21-0034** – The division issued a cease-and-desist order and fined Debt Pay Gateway \$75,000 for engaging in money transmission for 420 Oregon consumers without a money transmitter’s license. As a result of the division’s investigation and enforcement action, Debt Pay Gateway agreed to pay \$117,843 in restitution to its Oregon clients within 30 days from the date of the division’s order.
- **AAA Law Group LLC, DM-22-0034** – The division issued a cease-and-desist order and fined AAA Law Group \$130,000 for performing unregistered debt management services in Oregon, failing to obtain a surety bond, and charging excessive fees. As a result of the division’s investigation and enforcement action, AAA Law Group agreed to pay more than \$90,000 in restitution to 20 Oregon consumers within seven months from the date of the division’s order.
- **Darche Legal Group LLC, Better Business Marketing Inc., and Lemuel Thompson, DM-22-0053** – The division issued a cease-and-desist order and fined Darche Legal Group LLC, Better Business Marketing Inc., and Lemuel Thompson \$15,000 each for offering to perform unregistered debt management services in Oregon, failing to obtain a surety bond, and charging excessive fees, among other violations. Thompson, using his business entity, Better Business Marketing, solicited an Oregon consumer to offer to negotiate credit card debt owed. The Oregon consumer made payments to Darche Legal Group at Thompson’s direction totaling more than \$14,000, and no services were provided to the consumer.
- **Academy Home Service, DM-22-0087** – The division issued a cease-and-desist order and fined Academy Home Service \$10,000 for offering mortgage loan modification services to an Oregon consumer without being licensed as a mortgage broker or registered as a debt management service provider, and for charging excessive fees.