STATE OF OREGON
DEPARTMENT OF CONSUMER AND BUSINESS SERVICES
DIVISION OF FINANCIAL REGULATION

In the Matter of: CA ENTERPRISES, a California corporation, (dba PREMIER SERVICES, PREMIER LEGAL SERVICES, and PROGRESSIVE PREMIER GROUP); MAIK GEORGES DENNO (aka "MIKE DENNO"), an individual; and JESCAR DENNO, an individual Respondents.	Case No. DM-24-0062 FINAL ORDERS TO CEASE AND DESIST AND ASSESSING CIVIL PENALTIES, ENTERED BY DEFAULT THIS IS A FINAL ORDER

On March 11, 2025, the Division of Financial Regulation ("Division") acting on behalf of the Director of the Department of Consumer and Business Services for the State of Oregon ("Director"), served Orders to Cease and Desist, Proposed Orders Assessing Civil Penalties, and Notice of Right to an Administrative Hearing ("Notice Order") on CA Enterprises, (doing business as Premier Services, Premier Legal Services, and Progressive Premier Group); Maik Georges Denno ("Mike Denno"); and Jescar Denno (collectively "Respondents"). The Notice Order provided notice that the Director issued an order to cease and desist and proposed an order assessing civil penalties against Respondents for violations of Oregon Revised Statutes ("ORS") 86A.095 to 86A.198 (the "Oregon Mortgage Lender Law"), ORS 697.602 *et seq*. and Oregon Administrative Rules ("OAR") 441-910-0000 through 441-910-0200 (collectively, "Oregon Debt Management Service Provider Law").

The Notice Order offered Respondents an opportunity for a hearing if requested within 20 days of the Notice Order. The Notice Order further informed Respondents that if a hearing were not conducted because Respondents did not timely request a hearing or otherwise defaulted, then the designated portion of the Division's file and all materials

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submitted by Respondents in this case would automatically become part of the contested case record for the purpose of proving a prima facie case.

The Director did not receive from Respondents a request for a hearing and did not conduct a hearing.

The Director finds that the record of this proceeding proves a prima facie case.

Now, therefore, after considering the relevant portions of the Division's file relating to this matter, the Director finds and orders as follows.

FINDINGS OF FACT

The Director FINDS the following:

Respondent CA Enterprises

1. "Premier Services" is an assumed business name of Respondent CA Enterprises.

2. CA Enterprises is a California corporation. CA Enterprises was organized on October 18, 2019. In its most recent filings with the California Secretary of State, CA Enterprises identifies its principal place of business as 10737 Laurel Street, Rancho Cucamonga, CA 91730 ("the Rancho Cucamonga Address"). CA Enterprises' address for service of process is 1912 E Vernon Avenue, Suite 100, Los Angeles, California 90058.

3. CA Enterprises has also used the address 790 East Colorado Blvd., suite #900, Pasadena California 91101 ("the Pasadena Address") on its communications to the public. However, this address is a virtual office. On knowledge and belief, CA Enterprises no longer uses the Pasadena Address.

4. In addition to doing business under the name "Premier Services", CA Enterprises does business under the names "Premier Legal Services," and "Progressive Premier Group."

5. CA Enterprises has never been registered to perform debt management services or licensed to act as a mortgage broker in Oregon.

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6. On knowledge and belief, CA Enterprises is one of a number of legal entities organized by Respondents Mike Denno and Jescar Denno for the purpose of unlawfully soliciting debt relief business from persons experiencing acute financial distress. Several of these entities are described in greater detail below.

7. On knowledge and belief, CA Enterprises is wholly controlled by Respondents Mike Denno and Jescar Denno.

8. On February 4, 2021, the Division entered an Order by default against CA Enterprises in Department of Consumer and Business Services Case No. DM-20-0051 ("the 2020 Case"). In the 2020 case the Division found that the activities of CA Enterprises in Oregon violated the Oregon Mortgage Lender Law and the Oregon Debt Management Service Provider Law.

9. The Order in the 2020 Case assessed civil penalties against CA Enterprises in the amount of $30,000, which have never been paid. The Order also required CA Enterprises to cease and desist from engaging in any further violations of ORS 86A.103(1), ORS 86A.154(3), ORS 697.612, ORS 697.652, ORS 697.662, and ORS 697.692.[1]

The DO Complaint

10. On January 26, 2024, an Oregon consumer who will be identified for purposes of this Order as DO, received a mailer from "Premier Services."

11. At the time "Premier Services" made contact with DO, DO was 80 years of age and was facing foreclosure on his residence located in Independence, Oregon.

12. The mailing DO received from "Premier Services" specifically identified DO's residence address and identified the fact that the residence had been scheduled for a

[1] In addition to the facts laid out above, on January 18, 2024, the US Bankruptcy Court for the District of Maryland entered an order permanently enjoining CA Enterprises (dba Premier Services and Premier Legal Services) from operating in the District of Maryland. On July 2, 2024, the US Bankruptcy Court for the Southern District of Texas entered a similar injunction against CA Enterprises and Jescar Denno. The facts of the Maryland and Texas cases are broadly similar to those related to the DO complaint, as more fully described in paragraphs 10-15 herein.

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foreclosure sale on January 30, 2024. The mailing further stated that "Premier Services" might be able to prevent the foreclosure sale and negotiate a reduction in the principle and rate of interest on DO's mortgage. The mailing instructed DO to contact "Premier Services" at 1 (800) 343-9167 and warned that this would be the final attempt by "Premier Services" to make contact.

13. DO contacted "Premier Services" by telephone on January 26, 2024. DO spoke to two persons—one who identified herself as "Jessica" and a second who identified himself as "Edwin."[2] In the course of this phone call, "Edwin" advised DO that Premier Services could stop the foreclosure sale, but only if DO paid Premier Services $1,000 up front and $400 per month thereafter.

14. Based on these instructions, and in the hope of preventing the foreclosure sale, DO remitted $1,000 to Premier Services on January 26, 2024. Premier Services did not provide or enter into a written agreement with DO that identified the fees it would charge, or provide any other written explanation of how it calculated the amount of the fees. Similarly, Premier Services did not provide DO with a budget analysis that evaluated whether the debt management services being offered were advantageous to DO.

15. Despite receiving these funds from DO, Premier Services took no action on behalf of DO. DO's home was sold at foreclosure sale on January 30, 2024 and the foreclosure sale was not reversed.

Respondent Jescar Denno

16. On knowledge and belief, Respondent Jescar Denno is the brother of Respondent Mike Denno.

17. Jescar Denno is identified in CA Enterprises' organizing documents filed with the California Secretary of State's office as the Chief Executive Officer, Secretary, Chief Financial Officer, and sole Director of CA Enterprises.

[2] Both "Jessica" and "Edwin" may be assumed names.

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18. Jescar Denno is also identified as the Chief Executive Officer, Secretary, and Chief Financial Officer of Empire Services—a California corporation that identifies its line of business as "legal services and consulting."

19. On January 19, 2012, Jescar Denno registered the Uniform Resource Locator (URL) address progressivesgroup.com. At this time, Jescar Denno identified himself as a "manager" at Haven Legal Group. The www.progressivesgroup.com URL was used for a website for Premier Services.

20. On knowledge and belief, Jescar Denno registered a website for Premier Legal Services at premierlegalservices.net on August 13, 2017.

21. On November 19, 2019, Jescar Denno entered into an agreement for virtual office services on behalf of "Premier Services/Premier Legal Services". This agreement enabled CA Enterprises to use the Pasadena Address as CA Enterprises' mailing address.

Respondent Maik Georges ("Mike") Denno

22. On knowledge and belief, Respondent Mike Denno is the brother of Respondent Jescar Denno.

23. Mike Denno is identified in documents filed on September 29, 2009 with the Nevada Secretary of State and on November 9, 2009 with the California Secretary of State as the Chief Financial Officer and Secretary of Ideal Real Estate Solutions and Law Offices of Gregory Alan Baker, Inc ("Ideal Real Estate Solutions and Law Office of Gregory Alan Baker").

24. On May 10, 2010, Mike Denno was identified in documents filed with the California Secretary of State as CFO and Secretary of Realty Law Group, Inc ("Realty Law Group").

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25. Also on May 10, 2010, Mike Denno was identified in documents filed with the California Secretary of State as the Manager of Realty Group and Consulting, LLC.[3]

Ideal Real Estate Solutions and Law Office of Gregory Alan Baker, Inc.

26. As was discussed in Paragraph 23 above, in 2009 Mike Denno formed Ideal Real Estate Solutions and Law Office of Gregory Alan Baker, Inc. with California-licensed attorney Gregory Alan Baker ("Baker").

27. Ideal Real Estate Solutions and Law Office of Gregory Alan Baker offered to represent consumers in matters relating to debt relief, including mortgage modifications, foreclosure defense, and bankruptcy proceedings.

28. In November of 2011, the California State Bar began disciplinary proceedings against Baker. The disciplinary charges against Baker included several instances where Baker was retained through Ideal Real Estate Solutions and Law Office Of Gregory Alan Baker to negotiate mortgage modifications for consumers. In these cases Ideal Real Estate Solutions and Law Office of Gregory Alan Baker, Inc. collected fees from consumers for the services to be performed by Baker. Baker then withdrew from representation without performing the agreed-upon services.

29. The disciplinary proceedings against Baker culminated in Baker's disbarment, on October 7, 2013.

30. The California Secretary of State registration of Ideal Real Estate Solutions and Law Office of Gregory Alan Baker, Inc. was forfeited effective December 3, 2012 for failure to pay California franchise taxes.

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[3] The documents filed with the California Secretary of State in connection with Realty Group and Consulting LLC gives the address for Real Estate Group and Consulting, LLC as 715 N Mountain Ave #200, Upland CA 91786. Documents filed on March 19, 2009 with the Nevada Secretary of State and on May 26, 2009 with the California Secretary of state also identify 715 N Mountain Ave #200, Upland CA 91786 as the address of Ideal Real Estate Solutions, Inc. These same documents identify Eliana Dennou as the Chief Executive Officer of Ideal Real Estate Solutions, Inc. Eliana Dennou is also identified as a co-policyholder with Jescar Denno on proof of insurance forms that Jescar Denno provided in connection with the virtual office agreement on behalf of CA Enterprises discussed in Paragraph 21 above.

Realty Law Group, Inc.

31. As was discussed in Paragraph 24, above, Mike Denno formed Realty Law Group, Inc. in May of 2010.

32. In August of 2011, Denno hired an attorney who will be identified for purposes of this Order as GT to represent customers of Realty Law Group, Inc. On knowledge and belief, Realty Law Group, Inc. held itself out as providing services relating to debt relief, including mortgage modifications, foreclosure defense, and bankruptcy proceedings.

33. Realty Law Group solicited customers by directly calling or sending mailers to persons who were either on the verge of foreclosure or who had recently lost their homes to foreclosure. As with the mailer received by DO, the mailers sent by Realty Law Group typically called out that the recipient's home was scheduled for foreclosure and offered to prevent the foreclosure sale and negotiate a reduction in the principle and rate of interest on the recipient's mortgage.

34. In September of 2012, the California State Bar began disciplinary proceedings against GT. The disciplinary charges against GT included several instances where GT was retained to represent customers of Realty Law Group, Inc. to file bankruptcy petitions and to negotiate mortgage modifications. In these cases Realty Law Group collected fees for its services in advance and either provided no services or provided materially inadequate services.

35. The disciplinary proceedings against GT culminated in GT's disbarment effective August 20, 2014. In the disbarment decision, the California State Bar Court concluded that Mike Denno—rather than GT—owned substantially all of the assets of GT's purported legal practice and that the operations of Realty Law Group, Inc. were carried out primarily by staff that answered to Mike Denno.

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36. The California Secretary of State registration for Realty Legal Group was suspended on July 1, 2013 for failure to pay California franchise taxes and has not been renewed.

Haven Legal Group

37. As discussed in Paragraph 19, Jescar Denno held himself out as the "manager" of Haven Legal Group when he registered the progressivesgroup.com web address in January of 2012.

38. Haven Legal Group A.P.C was organized on October 23, 2012. The organizing documents identify the purpose of Haven Legal Group A.P.C. as "to engage in the profession of law." On knowledge and belief, Mike Denno and Jescar Denno controlled Haven Legal Group and caused these documents to be submitted to the California Secretary of State.

39. In November of 2012, Mike Denno posted an advertisement in Craigslist advertising a fully staffed law office seeking an attorney to run the law practice. An attorney who will be identified for the purposes of this Order as KB responded to this advertisement and was promptly hired by Mike Denno.

40. KB and Mike Denno agreed to split the profits from the law office, with KB providing legal services and Mike Denno advertising and finding clients for the law office.

41. On November 16, 2012 KB filed documents with the California Secretary of State amending the organizing documents of Haven Legal Group to designate himself as the Chief Executive Officer, Secretary, and Chief Financial Officer of Haven Legal Group. On knowledge and belief, Mike Denno and Jescar Denno exercised de facto control over the operations of Haven Legal Group.

42. In April of 2014, the California State Bar initiated disciplinary proceedings against KB based on his work with Haven Legal Group. The disciplinary charges against KB arose from an instance where KB was retained to represent clients of Haven Legal

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Group to prevent the foreclosure sale of the clients' home. Haven Legal Group collected fees in advance for KB's services but did not perform the services agreed to.

43. The disciplinary proceedings against KB culminated in KB's disbarment on April 3, 2015.

44. The California Secretary of State registration of Haven Legal Group was suspended on December 1, 2014 for failure to pay California franchise taxes and has never been renewed.

45. None of the Respondents have ever been registered to perform debt management services or licensed to act as a mortgage broker in Oregon.

CONCLUSIONS OF LAW

Unlicensed Mortgage Broker Activities

46. ORS 86A.103(1) forbids any person from engaging "in residential mortgage transactions in this state as a * * * mortgage broker" without a license.

47. Under ORS 86A.100(5)(a), a "mortgage broker" includes any person who, "for compensation, or in the expectation of compensation, either directly or indirectly makes, negotiates, or offers to make or negotiate a mortgage loan."

48. By offering to modify the payment terms of DO's residential mortgage loan in exchange for a fee, while not being licensed as a mortgage broker in Oregon, Respondents violated ORS 86A.103(1).

Prohibited Mortgage Broker Activities

49. ORS 86A.154(3) prohibits persons engaged in mortgage broker activities from engaging in "any act, practice or course of business which operates or would operate as a fraud or deceit upon any person."

50. By representing to DO through mailings and otherwise that Respondents would forestall or reverse the foreclosure sale of DO's home, but failing to take any action on

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behalf of DO to forestall or reverse the foreclosure, Respondents engaged in a deceitful course of business against Oregon consumer DO, in violation of ORS 86A.154(3).

Unregistered DMSP Activity

51. ORS 697.612(1)(a) forbids persons not registered with the Director from performing debt management services in Oregon.

52. Under ORS 697.602(2)(c) "Debt Management Service" includes, among other things, "modifying or offering to modify terms and conditions of an existing loan from or obligation to a third party," if that activity is done for money or other valuable consideration.

53. By offering to modify the payment terms of Oregon consumer DO's mortgage loans in exchange for a fee without being registered with the Director as a debt management service provider ("DMSP"), Respondents violated ORS 697.612(1)(a).

Improper Written Agreement

54. Under ORS 697.652(1)(d), a DMSP may not perform debt management services without first entering into a written agreement with the consumer that itemizes the fees the DMSP will charge, and explains how the DMSP calculated the amount of the fees.

55. By failing to provide DO with a written agreement or other documentation that itemizes fees as required by ORS 697.652(1)(d), Respondents violated ORS 697.652(1)(d).

Failure to Perform Budget Analysis

56. Under ORS 697.652(2), a DMSP may not contract to perform debt management services for a consumer without first giving the consumer an analysis of the consumer's budget that is separate from the agreement and that evaluates whether the debt management services being offered are advantageous to the consumer.

57. By failing to provide DO with a separate budget analysis, Respondents violated ORS 697.652(2).

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Prohibited DMSP Activities

58. Under ORS 697.662(12)(d)(A), a DMSP or a person required to register as a DMSP may not "Publish, distribute, or broadcast, or cause to be published, distributed, or broadcast an advertisement, presentation, or other communication or promotional material that * * * misrepresents, directly or indirectly * * * the nature of a service the debt management service provider or person will perform."

59. By representing to DO through mailings and otherwise that Respondents would forestall or reverse the foreclosure sale of DO's home, but failing to take any action on behalf of DO to forestall or reverse the foreclosure, Respondents misrepresented the nature of the services they intended to perform, in violation ORS 697.662(12)(d)(A).

Excessive Fees

60. Under ORS 697.692, a DMSP may charge a consumer only the fees itemized in ORS 697.692(1).

61. Under ORS 697.692(1)(a), an initial fee charged by a DMSP may not exceed $50.

62. By charging and collecting in advance from DO a fee for its services in excess of $50, Respondents violated ORS 697.692(1)(a).

63. Under ORS 697.692(1)(d), the fee of a DMSP who does not hold funds on behalf of a consumer (a) may not exceed 15 percent of the consumer's indebtedness, and (b) must be payable in monthly installments not to exceed $65 per month.

64. By charging and collecting in advance from DO a lump sum for its services that was not payable in monthly installments of $65 or less, Respondents violated ORS 697.692(1)(d).

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Violating Prior Orders of the Director

65. Pursuant to ORS 86A.115(3), a person violates the Oregon Mortgage Lender Law if person has "Willfully or repeatedly violated or failed to comply with * * * a rule or order" of the Director.

66. Respondent CA Enterprises violated ORS 86A.115(3) in two instances as follows:

a. By continuing to perform unlicensed mortgage broker activity in Oregon in violation of the Order in the 2020 Case, in violation of ORS 86A.103(1); and

b. By continuing to distribute mailings that effected a deceitful course of business, in violation of ORS 86A.154(3).

67. Pursuant to ORS 697.832(1), a person violates the Oregon Debt Management Service Provider Law if that person violates a cease and desist order issued under ORS 697.825.

68. Respondent CA Enterprises violated ORS 697.832(1) in five instances as follows:

a. By continuing to perform unregistered DMSP activities in Oregon, in violation of ORS 697.612(1).

b. By continuing to perform DMSP activities without first entering into a written agreement that itemizes the fees Respondents will charge, in violation of ORS 697.652(1)(d);

c. By continuing to perform DMSP activities without performing a budgetary analysis, in violation of ORS 697.652(2);

d. By continuing to distribute mailers that materially misrepresent the nature of the services Respondents intended to perform, in violation of ORS 697.662; and

e. By continuing to charge and collect fees that exceed the thresholds set in ORS 697.692, in violation of ORS 697.692.

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Cease and Desist Authority

69. Under ORS 86A.127, because the Director has reason to believe that Respondents have engaged in violations of the Oregon Mortgage Lender Law, the Director may issue an order to Respondents to cease and desist from violations of ORS 86A.095 to ORS 86A.198.

70. Under ORS 697.825(1)(a), because the Director has reason to believe that Respondents have engaged in violations of the Oregon Debt Management Service Provider Law, the Director may issue an order to Respondents to cease and desist from violations of the Oregon Debt Management Service Provider Law.

Civil Penalties Authority

71. Under ORS 86A.992(1), the Director may impose a civil penalty not to exceed $5,000 per violation against "any person who violates or who procures, aids, or abets in the violation of any provision of ORS 86A.095 to 86A.198."

72. Under ORS 697.832(1), the Director may impose a civil penalty in an amount not to exceed $5,000 for each violation of ORS 697.612 and ORS 697.642 to ORS 697.702.

ORDERS

Now therefore, the Director issues the following Orders:

Cease and Desist

73. As authorized by ORS 86A.127, the Director ORDERS Respondents to CEASE AND DESIST from violating ORS 86A.103(1) and 86A.154(3).

74. As authorized by ORS 86A.127, the Director ORDERS Respondent CA Enterprises to CEASE AND DESIST from violating ORS 86A.115(3).

75. As authorized by ORS 697.825(1)(a), the Director ORDERS Respondents to CEASE AND DESIST from violating ORS 697.612, 697.652, 697.662, and 697.692.

76. As authorized by ORS 697.825(1)(a), the Director ORDERS Respondent CA Enterprises to CEASE AND DESIST from violating ORS 697.832.

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Civil Penalties

77. As authorized by ORS 86A.992(1) (Oregon Mortgage Lender Law violations) and ORS 697.832(1) (DMSP violations), the Director hereby ORDERS that Respondents, jointly and severally, be subject to $35,000 in CIVIL PENALTIES as follows:

a. $5,000 for violating ORS 86A.103(1) (unlicensed mortgage broker activity), as described in Paragraphs 46-48, above;

b. $5,000 for violating ORS 86A.154(3) (prohibited mortgage broker activities), as described in Paragraphs 49-50, above;

c. $5,000 for violating ORS 697.612(1)(a) (unregistered DMSP activities), as described in Paragraphs 51-53, above;

c. $5,000 for violating ORS 697.652(1)(d) (improper agreement to perform DMSP activities), as described in Paragraphs 54-55, above;

d. $5,000 for violating ORS 697.652(2) (no separate budgetary analysis), as described in Paragraphs 56-57, above;

e. $5,000 for violating ORS 697.662(12)(d)(A) (prohibited DMSP activities), as described in Paragraphs 58-59, above; and

f. $5,000 for violating ORS 697.692(1)(a) and (d) (excessive DMSP fees), as described in Paragraphs 60-64, above.

78. As authorized by ORS 86A.992(1) (Oregon Mortgage Lender Law violations) and ORS 697.832(1) (DMSP violations), the Director hereby ORDERS that Respondent CA Enterprises be subject to $35,000 in CIVIL PENALTIES as follows:

a. $10,000 for violating the cease and desist provisions of the Order in the 2020 Case by violating ORS 86A.103(1) and ORS 86A.154(3), as described in Paragraphs 65-66, above; and

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b. $25,000 for violating the cease and desist provisions of the Order in the 2020 Case by violating ORS 697.612, ORS 697.652(1)(d), ORS 697.652(2), ORS 697.662, and ORS 697.692, as described in Paragraphs 67-68, above.

FINAL ORDER

79. This Order is a "Final Order" under ORS 183.310(6)(b). Subject to that provision, the entry of this Order does not limit other remedies that are available to the Director under Oregon law.

SO ORDERED this 17 day of April , 2025.

Andrew R. Stolfi, Director
Department of Consumer and Business Services

/s/ Dorothy Bean
Dorothy Bean, Chief of Enforcement
Division of Financial Regulation

NOTICE OF RIGHT TO JUDICIAL APPEAL

Judicial review of final orders in contested cases is governed by ORS 183.482. Respondents may request judicial review by filing a petition with the Court of Appeals in Salem, Oregon, within 60 days from the date this order is served.

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