

Taking Action



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 third and fourth quarters of 2025.

Insurance

- **UnitedHealthcare of Oregon, Inc.,** [INS-25-0020](#) – DFR issued a cease-and-desist order and fined UnitedHealthcare of Oregon \$100,000 for failing to timely pay clean claims in 2021 and 2022, and for sending deficient claims delay notifications to affected consumers. As a result of DFR’s investigation, UnitedHealthcare has made changes to its systems to address these prompt pay and notification violations.
- **Toyota Motor Insurance Services, Inc.,** [INS-25-0031](#) – DFR ordered Toyota Motor Insurance Services to submit to the Surplus Line Association of Oregon (SLA) outstanding reports and almost \$700,000 in premium taxes for independently procured insurance obtained from October 2017 to June 2025 for certain risk transfer agreements. DFR also ordered the company to pay over \$107,000 in interest on the outstanding premium taxes from October 2017 to April 2023 and SLA service fees.
- **Park Nelson and Chetco LLC,** [INS-25-0012](#) – DFR issued a cease-and-desist order and fined Park Nelson and Chetco \$45,000 for misappropriating \$16,572.37 in client premium funds, delaying repayment of those funds, impermissibly comingling funds, failing to maintain records and an appropriate accounting system, and failing to truthfully respond to case-related inquiries. Nelson and Chetco eventually refunded the misappropriated funds. In addition to the fine, DFR revoked Nelson and Chetco’s resident insurance producer licenses.
- **James H. Gibson,** [INS-25-0021](#) – DFR issued a cease-and-desist order and revoked the resident insurance producer license of James H. Gibson for failing to timely deposit or otherwise misappropriating customers’ premium payment funds. Gibson failed to timely deposit nearly \$4,000 in premium funds. He also failed to



deposit at any time additional premium funds totaling nearly \$2,000. As part of DFR’s case, Gibson agreed to repay all of the missing premium funds to the agency. DFR also fined Gibson \$9,000 and barred him from re-applying for any DFR license for a period of three years.

- **Sylvia Madison Porter,** [INS-24-0028](#) – DFR issued a cease-and-desist order, a \$5,000 fine, and revoked the resident insurance producer license of Sylvia M. Porter for submitting a false claim for the loss of her wedding ring. In addition to the fine and license revocation, Porter agreed to pay \$9,245 in restitution for the money she received from her false claim.
- **Christiann M. Mabee,** [INS-25-0018](#) – DFR issued a cease-and-desist order against Christiann M. Mabee and revoked her resident insurance producer license for using funds collected to pay her client’s insurance premiums to instead pay for her business expenses, and for failure to report her new business address. In addition to the cease-and-desist and revocation, DFR fined Mabee

\$6,500. As a result of DFR's investigation, Mabee repaid her agency the \$2,2862.24 in improperly utilized premium funds.

- **Daniel Munro and Munro Insurance Services LLC, [INS-24-0063](#)** – DFR issued a cease-and-desist order and fined Daniel Munro and Munro Insurance Services \$20,500 for selling 37 insurance policies to Oregon consumers through a third-party website without an insurance producer license. In addition to the fine, DFR took licensing action against Munro Insurance Services as related to Munro's failure to disclose a domestic violence conviction on the company license application and a related administrative action filed by another state.
- **Michelle Dajahnette Tate, [INS-25-0009](#)** – DFR issued a cease-and-desist order and revoked the nonresident insurance producer license of Michelle Dajahnette Tate for failing to disclose felony or misdemeanor indictments on a license application, failing to respond to inquiries from DFR, and for allowing her licenses to be revoked in four other states.
- **Chanthany Conger, [INS-25-0027](#)** – DFR issued a cease-and-desist order and fined Chanthany Conger \$1,000 for failing to report her criminal background in her resident insurance producer license application. In addition to the fine, Conger was allowed to surrender her resident insurance producer license in lieu of a license revocation.
- **Charles Edward Shambry, Jr., [INS-25-0059](#)** – DFR issued an order suspending the resident insurance producer license of Charles Shambry, Jr. for failure to pay child support arrears and failing to enter into an agreement with the Oregon Child Support Program to address those arrears.
- **Douglas A. Eze, [INS-25-0023](#)** – DFR issued a cease-and-desist order and revoked the nonresident insurance producer license of Douglas A. Eze as a result of his conviction of two felonies for false swearing in immigration matters in the U.S. District Court for the District of Maryland.
- **Dana Abdullah, [INS-25-0081](#)** – DFR issued a cease-and-desist order against Dana Abdullah for failing to pay the required license fee for her nonresident insurance producer license. The order also allowed Abdullah to voluntarily surrender her nonresident insurance producer license in Oregon in lieu of a revocation.
- **David Kennedy, [INS-25-0082](#)** – DFR issued a cease-and-desist order, a \$1,000 fine, and revoked the nonresident insurance producer license of David Kennedy for failing to pay the required license fee.
- **Maria De Jesus Pineda Landeros, [INS-25-0084](#)** – DFR issued a cease-and-desist order, a \$1,000 fine, and revoked the nonresident insurance producer license of Maria De Jesus Pineda Landeros for failing to pay the required license fee.
- **Gavin Henrich, [INS-25-0083](#)** – DFR issued a cease-and-desist order, a \$1,000 fine, and revoked the nonresident insurance producer license of Gavin Henrich for failing to pay the required license fee.
- **Nicole Celena Naeve, [INS-25-0055](#)** – DFR issued a cease-and-desist order, a \$1,000 fine, and revoked the nonresident insurance producer license of Nicole Naeve for failing to pay the required licensing fee.
- **Pamela N. McAtee, [INS-25-0053](#)** – DFR issued a cease-and-desist order, a \$1,000 fine, and revoked the nonresident insurance producer license of Pamela McAtee for failing to pay the required licensing fee.
- **Insured Nomads Corporation, [INS-25-0007](#)** – DFR issued a cease-and-desist order and fined Insured Nomads Corporation \$1,000 for failing to hold the same lines of authority in Oregon as in its home state, and for failing to respond to an inquiry from the Director. Nonresident licensees are required to hold a line of authority in their home state in order to hold that same line of authority in Oregon. Insured Nomads held Oregon lines of authority for health, life, property, and casualty insurance without holding the same lines in its home state of Delaware.

- **Benefit Source, Inc. dba BSI, [INS-25-0045](#)** – DFR issued a cease-and-desist order, a \$1,000 fine, and revoked the third-party administrator license of Benefit Source, Inc. dba BSI for failing to timely file the annual report required of third-party administrators for 2024.
- **Coforge BPM, Inc, [INS-25-0046](#)** – DFR issued a cease-and-desist order, a \$1,000 fine, and revoked the third-party administrator license of Coforge BPM, Inc for failing to timely file the annual report required of third-party administrators for 2024.
- **Firstsource Health Plans and Healthcare Services, LLC, [INS-25-0048](#)** – DFR issued a cease-and-desist order and fined Firstsource Health Plans and Healthcare Services, LLC \$1,000 for failing to timely file the annual report required of third-party administrators for 2024.
- **Lockton Affinity, LLC, [INS-25-0040](#)** – DFR issued a cease-and-desist order and fined Lockton Affinity \$1,000 for failing to timely file the annual report required of third-party administrators for 2024.
- **Myers-Stevens & Toohey & Co Inc., [INS-25-0043](#)** – DFR issued a cease-and-desist order and fined Myers-Stevens & Toohey \$1,000 for failing to timely file its annual report required of third-party administrators for 2024.
- **Sante Health System, Inc, [INS-25-0044](#)** – DFR issued a cease-and-desist order and fined Sante Health System \$1,000 for failing to timely file the annual report required of third-party administrators for 2024.
- **Southwest Business Corporation, [INS-25-0041](#)** – DFR issued a cease-and-desist order and fined Southwest Business Corporation \$1,000 for failing to timely file the annual report required of third-party administrators for 2024.
- **The Partners Group, LLC, [INS-25-0042](#)** – DFR issued a cease-and-desist order and fined The Partners Group \$1,000 for failing to timely file its annual report required of third-party administrators for 2024.

Mortgage



- **Carrie Conventional Services, LLC and Carrie A. Wood**, [M-24-0048](#) – DFR issued a cease-and-desist order against Carrie Conventional Services and Carrie Wood related to Wood’s role in the submission of three fraudulent Homeowners Assistance Fund applications. . The order also permanently bars Wood from obtaining any DFR license or registration, and prohibits her from ever seeking employment in any industry regulated by DFR. If Wood fails to meet these conditions, DFR retains the right to reinstate an \$80,000 fine previously assessed against her.
- **E-Mortgage Capital**, [M-25-0074](#) – DFR issued a cease-and-desist order against E-Mortgage Capital following a multistate exam with Hawaii, Idaho, and Texas for allowing unlicensed mortgage loan originators to conduct origination activity. E-Mortgage Capital also developed an insufficient remote work from home plan and failed to inspect remote work locations in a timely manner. Further, the company failed to cooperate in the examination by refusing to provide requested information and access to its loan origination system. DFR and the participating states fined E-Mortgage Capital \$669,000, with DFR’s portion of the fine totaling \$129,000.
- **Patrick Terrance Donlon**, [M-25-0096](#) – DFR issued an order against mortgage loan originator Patrick Donlon for directing another person to take required education on his behalf and taking the credit for himself. Under the order, Donlon is permanently barred from acting as a mortgage loan originator in Oregon, and in many other states, and cannot be a qualified individual or control person of any financial services entity registered with NMLS for two years. DFR’s order stems from a multi-state investigation coordinated by the Conference for State Bank Supervisors, which resulted in a total fine against Donlon of \$31,000, of which DFR received \$1,000.

Non-depository programs

- **#1 La Popular, LLC and Brenda Lili Barrera Orantes, et al.**, [CC-25-0034](#) – DFR issued a cease-and-desist order against Brenda Barrera Orantes, #1 La Popular, LLC, #1 La Popular 2, LLC, and La Popular 5 immediately suspended the five check-cashing business licenses held by Respondents. DFR suspended the licenses after Brenda Barrera Orantes was criminally indicted in federal court for using her check cashing businesses to launder and transmit money on behalf of transnational drug cartels. The suspension will remain in effect until a verdict has been entered in the criminal case, filed in the U.S. District Court for the State of Oregon, Case No. 3:25-00104.
- **Wheels Financial Group, LLC and WFG Purchaser, LLC**, [CF-22-0040](#) – DFR issued a cease-and-desist order and fined Wheels Financial Group, doing business as LoanMart and 1-800LoanMart, and WFG Purchaser \$660,000 for collecting and receiving finance charges relating to consumer finance loans that included interest rates which exceeded the statutory limits. In addition, Wheels, a consumer finance licensee, facilitated loans which contained impermissible power of attorney clauses, hold harmless clauses, and attorney free provisions. Finally, the activities of WFG, an affiliate of Wheels, required a consumer finance license the company did not possess. In addition to the cease-and-desist order and fine, Wheels and WFG agreed to pay \$900,000 in restitution to Oregon borrowers subject to excessive finance charges and forgive the outstanding balance for all Oregon borrowers with active loans.
- **Windsor Financial Group and Kevin Wilcot**, [CF-24-0068](#) – DFR issued a cease-and-desist order and fined Windsor Financial Group \$5,000 for making a consumer finance loan and receiving a payment toward the principal without a license. DFR also fined Kevin Wilcot \$2,500 for acting as a broker or facilitator of a consumer finance loan on behalf of Windsor Financial Group without a license.
- **Daniel March**, [DM-23-0062](#) – DFR issued a cease-and-desist order and fined Daniel March, the sole and managing shareholder of The Litigation Practice Group, P.C., \$80,000 for providing unregistered debt management services to at least four Oregon consumers, failing to perform a budget analysis for consumers, charging excessive initial fees for services, and charging excessive monthly fees for services. At the time of the order, The Litigation Practice Group, which purported to be a law firm offering debt relief legal services, was in a bankruptcy proceeding and the trustee was attempting to redistribute all of its assets to creditors and consumers. DFR also pursued enforcement action against The Litigation Practice Group and its employee Tony Diab, including issuing a cease-and-desist order against both and a \$80,000 fine against Diab for the same violations as March.
- **Allied Enrollment Centers, LLC**, [DM-25-0024](#) – DFR issued a cease-and-desist order and fined Allied Enrollment Centers \$10,000 for performing unregistered debt management services in Oregon and for failing to have the requisite surety bond. Allied Enrollment purports to assist borrowers with document preparation for federal student loan consolidation and repayment programs and charges borrowers for those services.
- **PNW Used Mobile Homes LLC**, [MSD-24-0061](#) – DFR issued a cease-and-desist order and fined Washington-based PNW Used Mobile Homes \$9,000 for selling at least nine manufactured structures in Oregon without a license. The business is still not licensed in Oregon but has ceased selling manufactured structures in the state.
- **Laura Glavin**, [PR-24-0051](#) – DFR issued a cease-and-desist order and fined Laura Glavin \$13,000 for engaging in business as a pharmaceutical representative in Oregon without a license for 28 days in 2023.

Securities

- **Edward D. Jones & Co., L.P., [S-25-0038](#)** – DFR issued a cease-and-desist order and fined Edward D. Jones & Co. \$100,000 for charging unreasonable commissions on certain small principal equity transactions. DFR found that Edward Jones failed to ensure its transactions were executed at a fair and reasonable price by charging minimum fixed commissions on certain equity transactions, and further that Edward Jones failed to supervise those transactions. In addition to the fine, the order required Edward Jones to repay Oregonians more than \$200,000 of those unreasonable commissions it collected between May 1, 2020 and April 30, 2025, plus interest. DFR's order stems from a multi-state investigation coordinated by the North American Securities Administrators Association, which resulted in a national settlement of more than \$5,000,000 in penalties plus restitution to impacted investors.
- **LPL Financial LLC, [S-25-0036](#)** – DFR issued a cease-and-desist and fined LPL Financial LLC \$20,000 for charging unreasonable commissions on certain small principal equity transactions. DFR found that LPL failed to ensure its transactions were executed at a fair and reasonable price by charging minimum fixed commissions on certain equity transactions, and further that LPL failed to supervise those transactions. In addition to the fine, the order required LPL to repay Oregonians more than \$31,000 of those unreasonable commissions it collected between April 30, 2020 and April 30, 2025, plus interest. DFR's order stems from a multi-state investigation coordinated by the North American Securities Administrators Association, which resulted in a national settlement of more than \$1,000,000 in penalties plus restitution to impacted investors.
- **RBC Capital Markets, LLC, [S-25-0035](#)** – DFR issued a cease-and-desist order and fined RBC Capital Markets, LLC \$20,000 for charging unreasonable commissions on certain small principal equity transactions. DFR found that RBC failed to ensure its transactions were executed at a fair and reasonable price by charging minimum fixed commissions on certain equity transactions, and further that RBC failed to supervise those transactions. In addition to the fine, to the order requires RBC to repay Oregonians more than \$105,000 of those unreasonable commissions it collected between May 16, 2020 and May 16, 2025, plus interest. DFR's order stems from a multi-state investigation coordinated by the North American Securities Administrators Association, which resulted in a national settlement of more than \$1 million in penalties and costs plus restitution to impacted investors.
- **Stifel, Nicolaus & Company, Inc., [S-25-0037](#)** – DFR issued a cease-and-desist order and fined Stifel, Nicolaus & Company \$10,000 for charging unreasonable commissions on certain small principal equity transactions. DFR found that Stifel failed to ensure its transactions were executed at a fair and reasonable price by charging minimum fixed commissions on certain equity transactions, and further that Stifel failed to supervise those transactions. In addition to the fine, the order requires Stifel to repay Oregonians more than \$9,000 of those unreasonable commissions it collected between May 1, 2020 and April 30, 2025, plus interest. DFR's order stems from a multi-state investigation coordinated by the North American Securities Administrators Association, which resulted in a national settlement of more than \$1,000,000 in penalties plus restitution to impacted investors.

- **TD Ameritrade, Inc., [S-25-0039](#)** – DFR issued a cease-and-desist order and fined TD Ameritrade, Inc. \$15,000 for charging unreasonable commissions on certain small principal equity transactions. DFR found that TD Ameritrade failed to ensure its transactions were executed at a fair and reasonable price by charging minimum fixed commissions on certain equity transactions, and further that TD Ameritrade failed to supervise those transactions. In addition to the fine, the order requires TD Ameritrade to repay Oregonians more than \$11,000 of those unreasonable commissions it collected between June 30, 2018 and June 30, 2023, plus interest. DFR's order stems from a multi-state investigation coordinated by the North American Securities Administrators Association, which resulted in a national settlement of more than \$800,000 in penalties and costs plus restitution to impacted investors.
- **The Advancement Group Investment Fund LLC, [S-25-0025](#)** – DFR issued a cease-and-desist order and fined The Advancement Group Investment Fund LLC \$80,000 for misrepresenting its financial management background, experience and activities, and soliciting an Oregon consumer to invest in fictitious projects under its purported management and control. The company and its owner, Ruben Ledesma Jr., used nearly all of the victim's investment funds for their benefit rather than legitimate investment projects. In addition to the cease-and-desist order and fine, DFR denied the company the use of securities exemptions and ordered that it pay the victim \$249,301 in restitution.
- **Nicholas O. Button aka Nick Button, [S-25-0015](#)** – DFR issued a cease-and-desist order and fined Nicholas Button \$70,000 for selling unregistered securities without a license, and engaging in securities fraud. Button accepted funds totaling \$140,000 from an Oregon consumer to use for day trading securities. Button used more than half of those funds for personal expenses and lost the rest attempting to day trade. In addition to the fine, DFR denied Button the use of securities exemptions and ordered that he pay the victim \$140,000 in restitution.
- **Prime Trading Partners LLC and Keith Buck, [S-25-0022](#)** – DFR issued a cease-and-desist order and fined Keith Buck and Prime Trading Partners \$30,000 for selling \$30,000 in silver bullion coins without being licensed as a broker dealer or having a commodities trading license or registration. DFR's investigation revealed that the coins purchased by the Oregon investor were never delivered and most of the funds were used by Buck for personal and other business expenses. The investor was eventually repaid by Buck through a civil lawsuit.
- **Anna Townsend and Ann Townsend LLC, [S-25-0050](#)** – DFR issued a cease-and-desist order and fined Anna Townsend and Ann Townsend LLC \$40,000 for participating and materially aiding in a scheme to induce an elderly consumer to sell securities and use the proceeds to provide financial assistance and make investments under fabricated circumstances. Respondents served as the intermediary for the transfer of funds to participants in the scheme. In addition to the cease-and-desist order and fine, DFR denied respondents the use of securities exemptions and ordered that they pay the victim \$163,000 in restitution.
- **Sharon Ann Bollinger, [S-25-0090](#)** – DFR issued a cease-and-desist order and fined Sharon Ann Bollinger \$1,000 for failing to disclose on her securities salesperson license application an administrative order issued by another state. Bollinger also failed to correctly answer background questions on her applications that she had been found to have violated any state regulatory agency regulations, including engaging in unlicensed activity while her license was lapsed in another state.