

**BEFORE THE COMMISSIONER OF SECURITIES AND INSURANCE,
OFFICE OF THE MONTANA STATE AUDITOR**

IN THE MATTER OF

PALUMBO JOHNSON, OPTIMISM
SERVICES, DINE EXEL SYSTEMS
LLC, NEWLEEZE LLC

Respondents.

Case No. SEC-2026-0000123

**FINAL AGENCY ACTION AND
DEFAULT ORDER**

On June 22, 2026, the Commissioner of Securities and Insurance, Office of the Montana State Auditor (“Commissioner”), served a Notice of Proposed Agency Action and Opportunity for Hearing (“NOPAA”) on Palumbo Johnson, Optimism Services, Dine Excel Systems LLC, and Newleeze LLC (“Respondents”). CSI has not received a written hearing request from the Respondents. The NOPAA provided the Respondents with an opportunity for an administrative hearing if requested within 24 days of service of the NOPAA. The NOPAA also warned that failure to respond and request a hearing by the deadline would result in a default order.

More than 24 days have elapsed since the date of the NOPAA; no request for a hearing has been received. Therefore, a default order will be issued under Admin. R. Mont. 1.3.214.

FINDINGS OF FACT

1. On June 18, 2025, CSI received a report from an investment advisor explaining that a 77-year-old client residing in Helena, Montana, L.M., had been defrauded out of approximately \$200,000. This matter was investigated by CSI Investigator Ryan Sullivan.

2. In late 2024, L.M. became involved a “romance fraud” initiated through email by Palumbo Johnson (“Johnson”).

3. Johnson claimed to be a U.S. military service member stationed overseas, first asserting to be in Germany and then the Middle East.

4. Johnson repeatedly solicited L.M.'s financial assistance to pay delivery and storage fees for a box of valuables. Johnson told L.M. the box was being held by the shipping company "Optimism Services" and contained his life savings, medals of honor, and other valuable property. Johnson needed the box to be returned to the United States, and the requested funds would be used to deliver the box to L.M., who Johnson had named as his designated beneficiary.

5. Under Johnson's direction, and the instructions provided by Optimism Services, L.M. liquidated \$106,723.98 worth of securities. L.M. then purchased multiple cashier's checks, sent them via FedEx overnight to business entities and individuals in Texas, including Dine Excel Systems, Newleeze, and Sylvester Ezeani.

6. According to L.M., Optimism Services repeatedly assured her that she would receive the "treasure box" or "trust box" belonging to Johnson, but because Johnson was in arrears on storage fees, Optimism Services required L.M. to send additional escalating payments to Dine Excel Systems LLC and Newleeze LLC.

7. Optimism Services' communications were signed by Liam Sylvester using the address optimismservicesweb.de@gmail.com. These messages provided the instructions to obtain and send the cashier's checks, including the amounts, the payees, and the FedEx overnight delivery specifications.

8. Dine Excel Systems LLC, is the named payee on checks purchased by L.M., in the amounts of \$8,630, \$35,500, and \$56,650, which were mailed to "Sylvester Ezeani" at 9100 Southwest Freeway, Suite 232, Houston, Texas 77074.

9. Newleeze LLC is the named payee on a cashier's check for \$99,980.

CONCLUSIONS OF LAW

10. The Commissioner has jurisdiction over this matter pursuant to the Securities Act of Montana. Mont. Code Ann. §§ 30-10-101 to 30-10-342.

11. The Commissioner enforces the Securities Act of Montana. *Id.*

12. The Commissioner is entrusted to protect investors, persons engaged in securities transactions, and the public interest. *Id.* § 30-10-102.

13. It is unlawful for any person, in connection with the offer, sale, or purchase of any security, whether directly or indirectly, to employ any device, scheme, or artifice to defraud, make any untrue statement of material fact, (or omit a material fact necessary to prevent any other statements from being misleading), or engage in any act, practice, or course of business that operates or would operate as a fraud or deceit on any person. *Id.* § 30-10-301(2).

14. For purposes of any action brought by the commissioner under the Securities Act of Montana “any person that knowingly provides substantial assistance to another person in violation of a provision of this part or of any rule or regulation issued under this part must be considered to be in violation of that provision to the same extent as the person to whom the assistance is provided.” *Id.* § 30-10-321.

15. The Commissioner may impose a fine not to exceed \$5,000 per violation on a person found to have engaged in any act or practice violating the Securities Act, a rule, or an order of the Commissioner. *Id.* § 30-10-305(3)(a).

16. The Commissioner may impose a fine not to exceed \$20,000 per violation on a person found to have engaged in any act or practice violating the Securities Act, and the act or practice affected a vulnerable person. Mont. Code Ann. § 30-10-305(3)(b).

17. After conducting a hearing under § 30-10-305, the Commissioner may also impose an order of restitution on any person found to have violated § 30-10-301, with ten percent annual interest from the date of violation, reasonable attorney’s fees, and costs associated with bringing the administrative action. Mont. Code Ann. § 30-10-309(1).

18. Respondent Johnson pursued a friendship and romantic relationship with L.M. that was used to motivate her to liquidate \$106,723 worth of securities under fraudulent pretenses. By engaging in this conduct in connection with the offer and sale of a security, which operated as fraud and deceit upon L.M., Respondent Johnson violated Mont. Code. Ann. § 30-10-301(1)(c).

19. L.M., who is at least sixty years of age, qualifies as a vulnerable person for the purpose of enhancing the fines imposed upon Respondents. *Id.* § 30-10-103(27)(a). Johnson's violation of the Securities Act harmed L.M., a vulnerable person, and the Commissioner may impose a fine of up to \$20,000 per violation. *Id.* § 30-10-305(3)(b).

20. Respondent Optimism Services, or Optimism Services Security Shipments and Co., is the named entity that purportedly held the "trust box" or box of valuables. Optimism Services demanded payment and issued instructions via email to obtain the funds from L.M.'s securities. Optimism Services participated in the fraud scheme by giving L.M. false assurances and corroborating Johnson's statements, thereby aiding in the deceit that resulted in the sale of L.M.'s securities. *Id.* § 30-10-301(1)(a), (c).

21. Respondents Dine Excel Systems LLC and Newleeze LLC, with the mailing address attention to "Sylvester Ezeani," were the named payees of the at least four documented cashier's checks totaling \$200,760 that were purchased with the liquidated securities and are, therefore, necessary parts of the "device" or "artifice" used to defraud L.M. *Id.*

22. Respondents' fraudulent scheme resulted in personal financial loss to L.M. and is grounds for the Commissioner to require Respondents to make restitution for all losses sustained as a result of Respondents' actions.

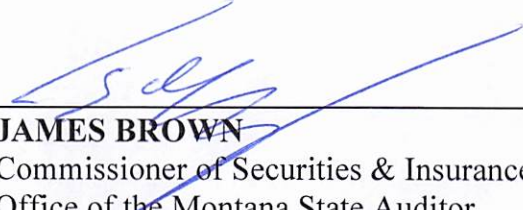
FINAL ORDER

THEREFORE, based on the foregoing findings of fact and conclusions of law, it is hereby ORDERED that:

1. Respondents have violated Mont. Code Ann. § 30-10-301.
2. Pursuant to § 30-10-305(3)(b), Respondents shall, jointly and severally, pay a fine of \$20,000 for violating Mont. Code Ann. § 30-10-301(3), plus interest at the statutory rate. Such fine shall be subordinate to the restitution in the event Respondents are unable to pay the full amount of the fine and restitution.

3. Pursuant to § 30-10-309, MCA, Respondent shall immediately pay restitution for the total losses to L.M. in the amount of \$200,760 together with 10% annual interest from June 18, 2025.

DATED this 23rd day of July 2026.



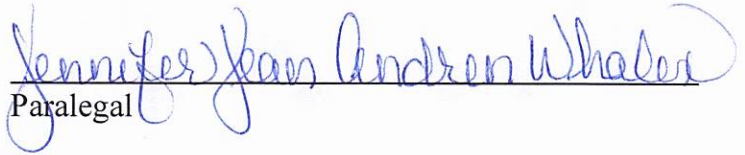
JAMES BROWN

Commissioner of Securities & Insurance,
Office of the Montana State Auditor

CERTIFICATE OF SERVICE

I hereby certify that on July 3rd, 2026, I caused a copy of the foregoing *Final Agency Action and Default Order* to be served on the following persons via email with the address that was provided:

PALUMBO JOHNSON
OPTIMISM SERVICES
DINE EXEL SYSTEMS LLC
NEWLEEZE LLC
OPTIMISMSERVICESWEB.DE@GMAIL.COM


Paralegal