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3 **STATE OF OREGON**
4 **DEPARTMENT OF CONSUMER AND BUSINESS SERVICES**
5 **DIVISION OF FINANCE AND CORPORATE SECURITIES**

6 **BEFORE THE DIRECTOR OF THE DEPARTMENT**
7 **OF CONSUMER AND BUSINESS SERVICES**

8 In the Matter of:

9 **Case No. DM-11-0059**

10 **BELMONT MEDIA, LLC,**
11 **d/b/a Crusader Consumer Services,**

12 **ORDER TO CEASE AND DESIST,**
13 **ORDER ASSESSING CIVIL PENALTY**
14 **AND CONSENT TO ENTRY OF ORDER**

15 Respondent.

16 WHEREAS, the Director of the Department of Consumer and Business Services for
17 the State of Oregon (hereinafter “the Director”), acting pursuant to the Oregon statutes
18 regulating debt management service providers, ORS 697.602 to ORS 697.842, has
19 conducted an investigation of Belmont Media, LLC, d/b/a Crusader Consumer Services
20 (hereinafter referred to as “CCS” or “Respondent”) and concluded that violations of
21 Oregon law had been committed; and

22 WHEREAS CCS wishes to resolve this matter with the Director;

23 NOW THEREFORE, as evidenced by the signature(s) subscribed on this Order, CCS
24 hereby CONSENTS to entry of this Order upon the Director’s Findings of Fact and
25 Conclusions of Law as stated hereinafter.

26 **I.**

FINDINGS OF FACT

The Director FINDS that:

1. Belmont Media, LLC is a Colorado limited liability company with offices
located at 4340 E. Kentucky Avenue, Suite 123, Glendale, Colorado 80246. Belmont
Media, LLC conducts business under the assumed business name Crusader Consumer





1 Services and maintains the website www.crusaderservices.com. Jason Belmont is the
2 manager and managing member of Belmont Media, LLC. Neither Belmont Media, LLC
3 nor the assumed business name Crusader Consumer Services are registered business
4 names with the Oregon Secretary of State.

5 2. At all times relevant to this matter, CCS held itself out as a debt management
6 service provider, as defined by ORS 697.602 and 697.612, by receiving money in return
7 for obtaining or attempting to obtain, as an intermediary on a consumer's behalf, a
8 concession from a creditor including, but not limited to, a reduction in the principal,
9 interest, penalties or fees associated with a debt.

10 3. Respondent, by and through its employees, contacted Oregon residents offering
11 to provide debt management services. Respondent, by and through its employees,
12 contacted Oregon residents by telephone, electronic mail, and United States mail.
13 Respondent, by and through its employees, directed Oregon residents to view its website.

14 4. Between January 2010 and present, Respondent entered into debt management
15 service agreements with at least 17 Oregon residents.

16 5. In each case, CCS charged its Oregon clients an initial fee in an amount greater
17 than \$50.

18 6. At no time material to this Order was CCS registered in Oregon with the Director
19 as a debt management service provider or licensed with the Director as a mortgage broker,
20 mortgage banker or mortgage loan originator.

21 7. At no time material to this Order did CCS file a bond with the Director as
22 required by Oregon law.

23 II.

24 CONCLUSIONS OF LAW

25 The Director CONCLUDES that:

26 8. Respondent CCS performed debt management services as defined by ORS



1 697.602(2)(d) when it received money in return for obtaining or attempting to obtain as an
2 intermediary on a consumer's behalf a concession from a creditor including, but not
3 limited to, a reduction in the principal, interest, penalties or fees associated with a debt.

4 9. Respondent CCS violated ORS 697.612 by engaging in the business of debt
5 management service provider without being registered with the Director. Each time
6 Respondent engaged in the business of debt management service provider in Oregon
7 without being registered with the Director is a separate and distinct violation of ORS
8 697.612.

9 10. Respondent CCS violated ORS 697.642(1) when it performed debt management
10 services without first filing a bond issued by one or more corporate sureties authorized to
11 do business in Oregon. Each time Respondent CCS performed or attempted to perform a
12 debt management service in Oregon without first filing a bond is a separate and distinct
13 violation of ORS 697.642(1).

14 11. Respondent CCS violated ORS 697.692(1)(a) when it charged consumers an
15 initial fee of more than \$50. Each instance Respondent CCS charged a consumer an initial
16 fee of more than \$50 is a separate and distinct violation of ORS 697.692(1)(a).

17 III.

18 ORDERS

19 NOW, THEREFORE, THE DIRECTOR ISSUES THE FOLLOWING ORDERS:

20 Order to Cease and Desist

21 12. Pursuant to the authority of ORS 697.825(1)(a), the Director hereby ORDERS
22 Respondent CCS, and all entities owned or controlled by CCS, their successors and
23 assignees, to CEASE AND DESIST from violating any provision of the Oregon statutes
24 regulating debt management service providers, ORS chapter 697, and any rule, order, or
25 policy issued by the Director under ORS chapters 697.

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1 Order Assessing Civil Penalty

2 13. Pursuant to the authority of ORS 697.832, the Director may assess a CIVIL
3 PENALTY in an amount of not more than \$5,000 per violation against any person who
4 violates ORS 697.602 to ORS 697.842, rules adopted pursuant to ORS 697.632 or any
5 order issued under ORS 697.825.

6 14. Pursuant to ORS 697.832, the Director hereby assesses Respondent CCS a
7 CIVIL PENALTY in the amount of \$50,000 (fifty thousand dollars) as follows:

8 A. A CIVIL PENALTY of \$10,000 (ten thousand dollars) for 17 violations of the
9 registration provisions of ORS 697.612 by engaging in the business of performing debt
10 management services without being registered with the Director;

11 B. A CIVIL PENALTY of \$20,000 (twenty thousand dollars) for 17 violations of
12 ORS 697.642(1) for performing debt management services without first filing a bond; and

13 C. A CIVIL PENALTY of \$20,000 (twenty thousand dollars) for 17 violations of
14 ORS 697.692(1)(a) by charging consumers an initial fee of more than \$50.

15 Suspension of Civil Penalty

16 15. The Director agrees to SUSPEND the collection of the \$50,000 CIVIL
17 PENALTY assessed herein provided Respondent CCS complies with the following terms
18 and conditions:

19 A. Within 15 (fifteen) days from the effective date of this Consent Order,
20 Respondent CCS will provide the State of Oregon, Division of Finance and Corporate
21 Securities ("Division"), with a calculation listing all amounts actually paid to CCS by
22 Oregon clients in the last five years and the amounts CCS paid to creditors on behalf of
23 each Oregon client.

24 B. Within 30 (thirty) days of the effective date of this Consent Order, Respondent
25 CCS will terminate all active accounts with all Oregon residents. CCS will send a letter to
26 each Oregon client explaining that the Division determined that CCS was not in



1 compliance with Oregon law and that the current clients must find another registered debt
2 management service provider, one registered to do business in Oregon, if they wish to
3 continue a debt reduction program. CCS will provide the Division with copies of the
4 letters sent to each of the Oregon clients.

5 C. Within 180 (one hundred eighty) days of the effective date of this Consent Order,
6 Respondent CCS will refund to all Oregon clients that CCS has done business with in the
7 past five years all funds collected by CCS that were not paid directly to creditors. When
8 the refunds are mailed, CCS will include a letter to each Oregon client explaining that the
9 refunds are being made because the State of Oregon determined that CCS was not in
10 compliance with Oregon law. CCS shall provide the Division with proof satisfactory to the
11 Division showing the refunds were timely made. CCS will also provide the Division with
12 copies of the cover letters to each of the Oregon clients.

13 D. On the effective date of this Consent Order, Respondent CCS will have in place
14 prominent disclaimers on its website, the websites of all affiliated companies, and in all
15 promotional materials published by or for CCS, to the effect that its debt management
16 services are not available to Oregon residents. Respondent CCS will maintain those
17 disclaimers until it becomes registered with the Director pursuant to ORS chapter 697.

18 E. Comply with all terms and conditions set out in the Consent Order and commit
19 no new violations of the Oregon statutes regulating debt management service providers,
20 ORS 697.602 to ORS 697.842, the rules adopted pursuant to ORS 697.632, or any order
21 issued under ORS 697.825.

22 16. If Respondent CCS commits no new violations of the statutes regulating debt
23 management service providers in Oregon, ORS 697.602 to ORS 697.842, and rules
24 adopted thereunder, during the three-year period from the effective date of this Consent
25 Order, the Director WAIVES the collection of the suspended CIVIL PENALTY assessed
26 herein.

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17. The Director reserves the right to immediately impose the suspended CIVIL PENALTY upon a determination that Respondent CCS has violated any term of this Consent Order.

18. The entry of this Consent Order in no way limits further remedies which may be available to the Director under Oregon law.

IT IS SO ORDERED.

Dated this 27th day of March, 2012 at Salem, Oregon.

PATRICK M. ALLEN, Director
Department of Consumer and Business Services

/s/ David Tatman
David C. Tatman, Administrator
Division of Finance and Corporate Securities

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Division of Finance and Corporate Securities
Labor and Industries Building
350 Winter Street NE, Suite 410
Salem, OR 97301-3888
Telephone: (503) 378-4387



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CONSENT TO ENTRY OF ORDER

I, Jason Belmont, state that I am an officer of Belmont Media, LLC d/b/a Crusader Consumer Services (“Respondent”), and I am authorized to act on its behalf; that I have read the foregoing Consent Order and that I know and fully understand the contents hereof; that Respondent and I have been advised of the right to a hearing and of the right to be represented by counsel in this matter; that Respondent, voluntarily and without any force or duress, consents to the entry of this Consent Order, expressly waiving any right to a hearing in this matter; that Respondent neither admits nor denies the Findings of Fact and Conclusions of Law in the foregoing Consent Order; that Respondent understands that the Director reserves the right to take further actions to enforce this Consent Order or to take appropriate action upon discovery of other violations of the Oregon statutes regulating debt management service providers, ORS 697.602 to ORS 697.842, the rules adopted pursuant to ORS 697.632, or any order issued under ORS 697.825, and that Respondent will fully comply with the terms and conditions stated herein.

Respondent further assures the Director that neither Respondent, nor its officers, directors, employees or agents, will offer or provide debt management services in Oregon unless such activities are in full compliance with chapter 697 of the Oregon Revised Statutes.

Respondent understands that this Consent Order is a public document.

By: /s/ Jason Belmont
Jason Belmont

Office Held: General Manager

ACKNOWLEDGMENT

State of Colorado

County of Arapahoe

There appeared before me this 15th day of March, 2012, Jason Belmont, who was first duly sworn on oath, and stated that he was and is an officer of Belmont Media, LLC d/b/a Crusader Consumer Services, and that he is authorized and empowered to sign this Consent Order on behalf of Belmont Media, LLC and to bind it to the terms hereof.

Margarita Marev
Signature of Notary Public