

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

In the Matter of:

Case No. DM-20-0037

CONSUMER FIRST LEGAL NETWORK,
LLC, a Wisconsin Limited Liability
Company,

ORDER TO CEASE AND DESIST,
ORDER ASSESSING CIVIL
PENALTY, AND CONSENT TO
ENTRY OF ORDER

Respondent.

The Director of the Department of Consumer and Business Services for the State of Oregon (“Director”), acting in accordance with Oregon Revised Statutes (“ORS”) 697.602 et seq. and Oregon Administrative Rules (“OAR”) 441-910-0000 through 441-910-0200 (collectively, “Oregon Debt Management Service Provider Law”), conducted an investigation into the activities of Consumer First Legal Network, LLC (“Respondent”) and determined that Respondent engaged in activities constituting violations of the Oregon Debt Management Service Provider Law.

Respondent wishes to resolve and settle this matter with the Director.

Now, therefore, as evidenced by the authorized signature subscribed on this Order, Respondent hereby CONSENTS to entry of this Order upon the Director’s Findings of Fact and Conclusions of Law as stated hereinafter.

FINDINGS OF FACT

The Director FINDS that:

1. Respondent is a Wisconsin limited liability company with a principal place of business located at 6918 Avalon Lane, Madison, WI 53719. Respondent’s Nationwide Multistate Licensing System (“NMLS”) number is 1993678.
2. From in or around April 2016 through in or around December 2019, Respondent

Division of Financial Regulation
Labor and Industries Building
350 Winter Street NE, Suite 410
Salem, OR 97301-3881
Telephone: (503) 378-4387



1 contracted with 37 Oregon residents (“Oregon Clients”) to reduce or attempt to reduce their
2 third-party consumer debt obligations.

3 3. At no time has Respondent been registered to perform debt management
4 services in Oregon.

5 4. In total, Respondent collected \$21,343.24 in fees from the Oregon Clients.

6 5. Respondent has fully cooperated with the Director’s investigation of this
7 matter. Except as set forth in the Conclusions of Law, the Director makes no determination
8 as to the quality or sufficiency of the debt management services Respondent provided the
9 Oregon Clients.

10 CONCLUSIONS OF LAW

11 The Director CONCLUDES that:

12 6. Obtaining or attempting to obtain concessions from a creditor on behalf of a
13 consumer, such as a reduction in the amount owed under a debt obligation, constitutes a
14 “debt management service” as defined under ORS 697.602(2).

15 7. By agreeing to perform debt management services for the Oregon Clients,
16 Respondent acted as a “debt management service provider” as defined under ORS
17 697.602(2)(c).

18 8. By acting as a debt management service provider without being registered with
19 the Director, Respondent violated ORS 697.612(1)(a) in 37 instances.

20 9. Because the Director has reason to believe that Respondent has engaged in
21 violations of the Oregon Debt Management Service Provider Law, the Director may issue
22 an order to Respondent to cease and desist from violations of the Oregon Debt Management
23 Service Provider Law under ORS 697.825(1)(a).

24 10. The Director may impose a civil penalty on a person in an amount not to exceed
25 \$5,000 for each violation of ORS 697.612 or 697.642 to 697.702, rules adopted under ORS
26 697.632 or order issued under ORS 697.825.



1 ORDERS

2 Now therefore, the Director issues the following Orders:

3 11. As authorized by ORS 697.825(1)(a), the Director ORDERS Respondent to
4 CEASE AND DESIST from violating ORS 697.612(1)(a).

5 12. Respondent shall CEASE providing debt management services to the Oregon
6 Clients. Future unregistered debt management services would result in additional
7 violations of the Oregon Debt Management Service Provider Law.

8 13. As authorized by ORS 697.832(1), the Director hereby ORDERS that
9 Respondent be subject to a CIVIL PENALTY of \$37,000 for violating ORS 697.612(1)(a).

10 14. The Director hereby suspends payment of \$32,000 of the civil penalty for a
11 period of three years, provided Respondent:

12 A. Pays the remaining \$5,000 of the civil penalty at the time this Order is
13 submitted to the Director;

14 B. Does not violate the Oregon Debt Management Service Provider Law
15 within the three-year time period; and

16 C. Pays \$21,343.24 to the Oregon Clients within three (3) months from the
17 effective date of this Order and provides the Division with documentation of such
18 payments within that timeframe.

19 15. The suspended civil penalty (\$32,000) will be waived three years from the date
20 this Order is finalized, provided Respondent has complied with the foregoing Order terms.

21 The Director reserves the right to immediately assess and collect the suspended civil
22 penalty upon a determination that Respondent has violated any term of this Order.

23 16. This Order is binding upon Respondent's successors and assigns.

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

4 SO ORDERED this 14th day of September, 2020.

5 ANDREW R. STOLFI, Director
6 Department of Consumer and Business Services

7 /s/ Dorothy Bean
8 Dorothy Bean Chief of Enforcement
9 Division of Financial Regulation

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ENTITY CONSENT TO ENTRY OF ORDER

I, Harold Stafford, state that I am an officer of Respondent and am authorized to act on its behalf. I have read the foregoing Order and know and fully understand the contents hereof. I have been advised of Respondent’s right to a hearing and right to be represented by counsel in this matter. Respondent voluntarily consents to the entry of this Order without any force or duress, expressly waiving any right to a hearing in this matter, as well as any rights to administrative or judicial review of this Order. Respondent understands that the Director reserves the right to take further actions against it to enforce this Order or to take appropriate action upon discovery of other violations of the Oregon Debt Management Service Provider Law with the terms and conditions stated herein.

Respondent further assures the Director that neither Respondent nor its officers, directors, employees, or agents will effect debt management services in Oregon unless such activities are in full compliance with the Oregon Debt Management Service Provider Law. Respondent understands that this Consent Order is a public document.

Signature: /s/ Harold Stafford

Position Held: Managing Attorney

State of Wisconsin

County of Dane

Signed or attested before me on this 18th day of August, 2020

by Harold Stafford.

/s/ Shane T. Monroe
Notary Public

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