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3 STATE OF OREGON  
4 DEPARTMENT OF CONSUMER AND BUSINESS SERVICES  
5 DIVISION OF FINANCIAL REGULATION

6 In the Matter of:

Case No. DM-21-0016

7 CONSUMER GUARDIAN SPECIALISTS  
8 LLC, dba CREDIT SHIELD,  
9  
10 Respondent.

FINAL ORDER TO CEASE AND  
DESIST AND FINAL ORDER  
ASSESSING CIVIL PENALTIES,  
ENTERED BY DEFAULT

11 On September 9, 2021, the Director of the Department of Consumer and Business  
12 Services for the State of Oregon (the “Director”), through the Oregon Division of Financial  
13 Regulation (the “Division”), properly served Consumer Guardian Specialists LLC, dba  
14 Credit Shield (“Credit Shield”) an Order to Cease and Desist, Proposed Order Assessing  
15 Civil Penalties, and Notice of Right to a Hearing (“Notice Order”) via regular and certified  
16 United States mail at Credit Shield’s last known business address and other known  
17 associated addresses.

18 On September 30, 2021, pursuant to ORS 63.731(2)(c) and (e), the Director,  
19 through the Division, served a copy of the Notice Order via regular and certified United  
20 States mail on the Oregon Secretary of State as an agent for service of process for Credit  
21 Shield at 255 Capitol Street NE, Ste 151, Salem, OR 97310.

22 The Notice Order offered Credit Shield an opportunity for a hearing, if requested  
23 in writing within 20 days of service. The Notice Order further informed Credit Shield that  
24 if a hearing was not conducted because it did not timely request a hearing or otherwise  
25 defaulted, then the designated portion of the Division’s file, which includes all materials  
26 Credit Shield submitted, would automatically become part of the contested case record to  
prove a *prima facie* case. Credit Shield has not made a written request for a contested

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1 hearing, and the time to do so has expired.

2 After considering the relevant portions of the Division’s file in this matter, the  
3 Director finds that the record proves a *prima facie* case.

4 Now, therefore, the Director makes the following Findings of Fact and Conclusions  
5 of Law and issues the following Orders.

6 **FINDINGS OF FACT**

7 The Director FINDS that:

8 1. Credit Shield is a debt validation company organized in Florida. Its principal  
9 place of business is at 23110 State Road 54, Ste 190, Lutz, FL. The company’s website is  
10 [www.creditshield.us](http://www.creditshield.us).

11 2. Credit Shield is neither registered with the Oregon Secretary of State to conduct  
12 business in Oregon nor registered with the Director, through the Oregon Division of  
13 Financial Regulation (the “Division”), to provide advice, assistance, instruction, or  
14 instructional material regarding debt management services.

15 3. Sarah M. Young is the company’s managing member.

16 4. For a fee, consumers can enroll in Credit Shield’s debt validation program (the  
17 “Program”), which aims to stop the debt collection process and eliminate debt. The fee is  
18 35% of the consumer’s debt enrolled in the Program.

19 5. As part of the Program, Credit Shield provides consumers with information and  
20 documents that will be sent to debt collectors and require the latter to verify the debt and  
21 provide proof of authority to collect it. If a debt collector is unable to do so, the consumer  
22 is not obligated to pay the debt, and the debt is, in effect, eliminated.

23 6. Credit Shield also provides consumers with instructions on how to handle calls  
24 from debt collectors.

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1 14. By offering or providing advice, assistance, instruction, or instructional  
2 material concerning a debt management service to Oregon Consumers without registering  
3 with the Director through the Division, Credit Shield violated ORS 697.612(1)(b)(E).

4 15. By failing to provide in its agreement the information described in paragraph 9  
5 of this Order, Credit Shield violated ORS 697.707(3)(a).

6 16. By failing to provide in its agreement the information described in paragraph  
7 10 of this Order, Credit Shield violated ORS 697.707(3)(b).

8 17. By charging Oregon Consumers an initial fee greater than \$50.00, Credit Shield  
9 violated ORS 697.692(1)(a).

10 18. Because the Director has reason to believe that Credit Shield violated  
11 ORS 697.612(1)(b)(E), ORS 697.707(3)(a) and (b), and ORS 697.692(1)(a), the Director  
12 is authorized under ORS 697.825(1)(a) to order Credit Shield to cease and desist from  
13 violating these statutes.

14 19. ORS 697.832(1) authorizes the Director to assess up to a \$5,000.00 civil penalty  
15 against Credit Shield per violation of the Oregon Debt Management Service Provider Law.

16 **ORDER**

17 Now therefore, the Director issues the following ORDERS:

18 20. As authorized by ORS 697.825(1)(a), the Director ORDERS Credit Shield to  
19 CEASE AND DESIST from violating ORS 697.612(1)(b)(E), ORS 697.707(3)(a) and (b),  
20 and ORS 697.692(1)(a).

21 21. As authorized by ORS 697.832(1), the Director ORDERS Credit Shield to pay  
22 \$100,000.00 in CIVIL PENALTIES, allocated as follows:

- 23 A. \$50,000.00 for violating ORS 697.612(1)(b)(E);  
24 B. \$10,000.00 for violating ORS 697.707(3)(a);  
25 C. \$10,000.00 for violating ORS 697.707(3)(b); and  
26 D. \$30,000.00 for violating ORS 697.692(1)(a).

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

4 SO ORDERED this 1<sup>st</sup> day of March, 2022.

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

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

11 **NOTICE OF RIGHT TO JUDICIAL APPEAL**

12 Except as provided in ORS 697.825(2)(e), you may be entitled to judicial review  
13 of this Order under ORS 183.482. You may request judicial review by filing a petition with  
14 the Court of Appeals in Salem, Oregon, within 60 days from the date of this Order is served.

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