

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

In the Matter of:

Case No. DM-22-0029

GLOBAL FINANCE, LLC, a Limited
Liability Company, and LESLIE LUBOW,
an Individual,

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

Respondents.

On February 24, 2022, the Director of the Oregon Department of Consumer and Business Services for the State of Oregon (the “Director”), through the Division of Financial Regulation (the “Division”), properly served Respondents, Global Finance, LLC (“Global Finance”) and Leslie Lubow (“Lubow”), an Order to Cease and Desist, Proposed Order Assessing Civil Penalties, and Notice of Right to a Hearing (“Notice Order”) via regular and certified United States mail at their last known addresses.

On March 17, 2022, pursuant to ORS 63.731(2)(c) and (e), the Director, through the Division, served a copy of the Notice Order via regular and certified United States mail on the Oregon Secretary of State as an agent for service of process for Respondents at 255 Capitol Street NE, Ste 151, Salem, OR 97310.

The Notice Order offered Respondents an opportunity for a hearing, if requested in writing within 20 days of service. The Notice Order further informed Respondents that if a hearing was not conducted because it did not timely request a hearing or otherwise defaulted, then the designated portion of the Division’s file, which includes all materials Respondents submitted, would automatically become part of the contested case record to prove a *prima facie* case. Respondents have 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. Now, therefore, the Director makes
4 the following Findings of Fact and Conclusions of Law and issues the following Orders.

5 **FINDINGS OF FACT**

6 The Director FINDS that:

7 1. Global Finance is an Arizona marketing company organized on or about
8 October 28, 2011. The company’s business address on file with the Arizona Corporation
9 Commission is 6633 E Greenway Parkway #2101, Scottsdale, Arizona 85254.

10 2. Lubow is the owner and manager of Global Finance.

11 3. Global Finance has never been registered with the Oregon Secretary of State to
12 conduct business in Oregon.

13 4. Neither Global Finance nor Lubow has ever been registered with the Division
14 as a debt management service provider (“DMSP”).

15 5. In or around 2019, Respondents provided marketing services for Webb Online
16 Companies, LLC, aka Web Online Companies, LLC, dba Direct Debt Relief (“Direct Debt
17 Relief”), a DMSP based in Arizona. That year, Respondents contacted LB, an Oregon
18 resident, and offered him assistance in settling certain unsecured debts.

19 6. Respondents analyzed LB’s finances, created a budget plan, and recommended
20 several companies that could assist him in settling his debts. LB chose Direct Debt Relief.

21 7. On or about January 4, 2020, LB signed a Debt Settlement Agreement
22 (“Agreement”) with Direct Debt Relief.

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1 8. For the services provided to LB, Respondents charged a fee equal to the
2 monthly payment required under the Agreement. In or around November and December
3 2019, Respondents cashed two checks made out to Global Finance from LB totaling
4 \$882.66.

5 **CONCLUSIONS OF LAW**

6 The Director CONCLUDES that:

7 9. By recommending DMSPs who can provide debt settlement services to an
8 Oregon consumer as described in paragraphs 5, 6, and 8 of this Order, Respondents
9 solicited an application from a consumer for a debt management service.

10 10. By soliciting an application for a debt management service from a consumer
11 without being registered as a DMSP, Respondents violated ORS 697.612(1)(b)(A).

12 11. By performing the service described in paragraphs 5, 6, and 8 of this Order for
13 a fee, Respondents provided advice, assistance, instruction, or instructional material
14 concerning a debt management service to an Oregon consumer.

15 12. By providing advice, assistance, instruction, or instructional material
16 concerning a debt management service for a fee to an Oregon consumer without registering
17 as a DMSP, Respondents violated ORS 697.612(1)(b)(E).

18 13. Because the Director has reason to believe that Respondents violated ORS
19 697.612(1)(b)(A) and (E), the Director is authorized under ORS 697.825(1)(a) to order
20 Respondents to cease and desist from violating those statutes.

21 14. ORS 697.832(1) authorizes the Director to assess against Respondents a civil
22 penalty of up to \$5,000.00 per violation of the Oregon Debt Management Service Provider
23 Law.

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1 **ORDER**

2 The Director issues the following ORDERS:

3 15. As authorized by ORS 697.825(1)(a), the Director hereby ORDERS
4 Respondents to CEASE AND DESIST from violating ORS 697.612(1)(b)(A) and (E).

5 16. As authorized by ORS 697.832(1), the Director ORDERS Respondents to pay,
6 jointly and severally, a \$5,000.00 CIVIL PENALTY for violating ORS 697.612(1)(b)(A)
7 and (E).

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

11
12 SO ORDERED this 12th day of April, 2022.

13 ANDREW R. STOLFI, Director
14 Department of Consumer and Business Services

15
16 /s/ Dorothy Bean
17 Dorothy Bean, Chief of Enforcement
18 Division of Financial Regulation

19 **NOTICE OF RIGHT TO JUDICIAL APPEAL**

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

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