DEPARTMENT OF CONSUMER AND BUSINESS SERVICES
DIVISION OF FINANCE AND CORPORATE SECURITIES
ENFORCEMENT SECTION
BEFORE THE DIRECTOR OF THE DEPARTMENT OF CONSUMER AND BUSINESS SERVICES

In the Matter of:	CF-06-0015
Noble Finance Corporation,	**ORDER TO CEASE AND DESIST**
Respondent.	**ORDER TO RESTORE CREDIT AND REIMBURSE MONEYS**
	ORDER ASSESSING INVESTIGATIVE AND PUBLICATION COSTS
	And
	CONSENT TO ENTRY OF ORDER

(In left margin, rotated:) Division of Finance and Corporate Securities
Labor and Industries Building
350 Winter Street NE, Suite 410
Salem, OR 97301-3881
Telephone: (503) 378-4140

WHEREAS the Director of the Department of Consumer and Business Services for the State of Oregon (hereinafter "the Director"), acting by authority of the Oregon Consumer Finance Act, Chapter 725 of the Oregon Revised Statutes (hereinafter "ORS Chapter 725"), has conducted an investigation of the possession by an unauthorized third person of confidential customer files of Noble Finance Corporation (hereinafter "Noble") and determined that there is reasonable cause to believe that Noble engaged in activities which could constitute violations of ORS Chapter 725 and Oregon Administrative Rules Chapter 441 Division 730 (hereinafter "OAR 441-730"); and

WHEREAS Noble wishes to resolve and settle this matter with the Director,

NOW THEREFORE, as evidenced by the authorized signatures subscribed on this order, Noble 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

2   1. At all times relevant to this matter, Noble Finance conducted business in Oregon

3   as a consumer finance lender through offices licensed by the Division under the Oregon

4   Consumer Finance Act (hereinafter "the Act"). The Division issued license number

5   0102-001-C for Noble Finance to operate an office then located at 4109 SE 82nd

6   Avenue, Portland, Oregon (hereinafter "the Office").

7   2. In or about July 2005, a person not authorized to possess confidential customer

8   files in the custody of the Office obtained possession of confidential customer files.

9   3. Probable cause exists that the unauthorized person's possession of the

10 confidential customer files would not have occurred if the Office had employed

11 adequate record security policies, procedures, and practices.

12   4. Subsequent to July 2005, Noble hired an outside firm, Apgar & Associates

13 (hereinafter "Apgar"), to review its file security policies, procedures, and practices.

14 Noble made changes as suggested by Apgar and a follow-up audit by the firm found

15 that Noble was adhering to good file security policies, procedures and practices.

16 Apgar's letter to D.L. Belcher dated January 3, 2007, attached as Exhibit 1 hereto, listed

17 actions being taken to secure the confidentiality of customer files at Noble, which were

18 adequate to comply with expected security at the time.

19   5. The Director incurred expenses in the investigation of the possession of the

20 customer files by the unauthorized person.

21   6. Noble has ceased making loans from its offices in Oregon and is not transacting

22 business under a license issued by the Department.

23

24   **CONCLUSION OF LAW**

25   Based on the Findings of Fact, the Director **CONCLUDES** that:

    1. There is reasonable cause to believe that Noble's failure to employ adequate

record security policies, procedures, and practices such that a person not authorized to

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Finance Corporation

possess confidential customer files in the custody of the Office obtained possession of confidential customer files prior to July 2005, if known to the Director at the time of licensing, would have warranted the Director refusing to issue a license to Noble pursuant to ORS 725.140, constituting grounds to suspend the license pursuant to ORS 725.230.

2. The Director is entitled to recover from Noble the costs that the Director incurred investigating the possession of customer files of Noble by an unauthorized person pursuant to ORS 725.310.

ORDER

The Director, pursuant to the Act, hereby **ORDERS** that Noble and any assigns or successors shall:

1. In conducting business in Oregon, employ the record security policies, procedures, and practices that are at least as effective as those described in Apgar's letter to D.L. Belcher dated January 3, 2007 and that comply with the Oregon Identity Theft Protection Act.

2. Restore the credit of any customer in whose name credit was unlawfully obtained as a result of the unauthorized possession of customer files described in Finding of Fact No. 2.

3. Reimburse any moneys stolen from a customer as a result of the unauthorized possession of customer files described in Finding of Fact No. 2.

4. Pay the Division $5,000 to assist in the production and dissemination of a brochure that informs entities regulated by the Division about record protection obligations and strategies.

5. Pay the Department of Consumer and Business Services $20,000 as reimbursement for the costs of the investigation.

The date of this order is the day the Director or Director's nominee signs the order. The entry of this Order in no way limits further remedies which may be available to the Director under Oregon law.

DATED this 18TH day of _____April_____, 2008.

CORY STREISINGER, Director
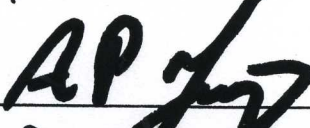**Department of Consumer and Business Services**

[signature: David Tatman]

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

CORPORATE CONSENT TO ENTRY OF ORDER

I, A. P. Gentry, state that I am an officer of Noble Finance Corporation and I am authorized to act on its behalf; that I have read the foregoing Order and that I know and fully understand the contents hereof; that I and this entity have been advised of the right to a hearing and of the right to be represented by counsel in this matter; that Noble Finance Corporation neither admits nor denies the findings of Facts and Conclusion of Law contained herein; that Noble Finance Corporation voluntarily and without any force or duress, consents to the entry of this Order, expressly waiving any right to a hearing in this matter; that Noble Finance Corporation understands that the Director reserves the right to take further actions to enforce this Order or to take appropriate action upon discovery of violations of the Oregon Consumer Finance Law; and that Noble Finance Corporation will fully comply with the terms and conditions stated herein.

Respondent understands that this Consent Order is a public document.

Dated this 4th day of _____April_____, 2008.

By _[signature: A P Gentry]_ A. P. Gentry

President / CEO
Position held

[left margin, rotated text] Division of Finance and Corporate Securities
Labor and Industries Building
350 Winter Street NE, Suite 410
Salem, OR 97301-3881
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CORPORATE ACKNOWLEDGMENT

There appeared before me this 4th day of April _____, 2008, by A. P.
Gentry, who was first duly sworn on oath, and stated that he was and is the
President/CEO of Noble Finance Corporation and that he is authorized and
empowered to sign this Consent to Entry of Oregon on behalf of Noble Finance
Corporation and to bind Noble Finance Corporation to the terms hereof.

Rebecca Hudson
Notary Public
for the State of: _Texas_

My commission expires: _4/23/10_

REBECCA I. HUDSON
MY COMMISSION EXPIRES
April 23, 2010

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