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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-19-0143

7 DOCUMENTS DONE RIGHT, INC.,

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

8 Respondent.

9 On January 6, 2020, the Director of the Department of Consumer and Business
10 Services for the State of Oregon (“the Director”), through the Oregon Division of Financial
11 Regulation (“the Division”) properly served Documents Done Right, Inc. (“DDR” or “the
12 company”) an Order to Cease and Desist, Proposed Order Assessing Civil Penalties, and
13 Notice of Right to a Hearing (“Notice Order”) via regular and certified United States mail
14 at the company’s principal business address and other known addresses associated with the
15 company.

16 The Notice Order offered DDR an opportunity for a hearing, if requested in writing
17 within 20 days. The Notice Order further informed DDR that if a hearing was not conducted
18 because the company did not timely request a hearing or otherwise defaulted, then the
19 designated portion of the Division’s file, which includes all materials DDR submitted,
20 would automatically become part of the contested case record to prove a *prima facie* case.

21 DDR requested a hearing in writing on January 29, 2020, three days after the
22 deadline, and has not shown good cause for its late hearing request.

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

25 Now, therefore, the Director makes the following Findings of Fact and Conclusions
26 of Law and issues the following Order:

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



1 **FINDINGS OF FACT**

2 The Director FINDS that:

3 1. DDR is a Nevada corporation with a principal business address of 3555 Pecos-
4 McLeod Interconnect, Las Vegas, Nevada 89121. The company’s website is
5 www.documentsdoneright.com.

6 2. Alexander Bykhovsky is the company’s president and chief executive officer.

7 3. DDR is neither registered with the Oregon Secretary of State to conduct
8 business in Oregon nor registered with the Director, through the Division, to provide debt
9 management services in Oregon.

10 4. For a fee, DDR provides document preparation services to borrowers applying
11 to the various student loan repayment, consolidation, and forgiveness programs of the U.S.
12 Department of Education (“DOE”). Borrowers, however, may apply to these programs for
13 free.

14 5. One of the DOE’s student loan repayment programs is the Pay As You Earn
15 Repayment Plan (“PAYE Plan”).

16 6. In or around December 2018, JS, an Oregon resident, contracted with DDR in
17 writing (“the Agreement”) to prepare his PAYE Plan application. Per the Agreement,
18 preparing the application included computing the payment schedules of the repayment
19 options available, verifying information and reconciling documents, and providing all
20 application materials in a “certified email Package for submission to the DOE.”

21 7. DDR charged JS \$1,199 in fees, which JS paid in five installments of \$199.83
22 from January to May 2019, and one installment of \$199.85 in June 2019.

23 8. Following an investigation by the Division, DDR refunded JS the fees he paid
24 DDR.

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1 **CONCLUSIONS OF LAW**

2 The Director CONCLUDES that:

3 9. By agreeing to prepare, and preparing, JS’s PAYE Plan application for a fee,
4 DDR modified or offered to modify the terms and conditions of an existing loan from or
5 obligation to a third party.

6 10. By modifying or offering to modify terms and conditions of an existing loan
7 from or obligation to a third party, DDR performed a debt management service, as defined
8 in ORS 697.602(2)(c).

9 11. By performing a debt management service in Oregon without being registered
10 with the Division, DDR violated ORS 697.612(1)(a).

11 12. By charging JS an initial fee of \$199.83, DDR violated ORS 697.692(1)(a),
12 which prohibits a debt management service provider from charging an initial fee over \$50.

13 13. Because the Director has reason to believe that DDR violated ORS
14 697.612(1)(2) and ORS 697.692(1)(a), the Director is authorized under ORS 697.825(1)(a)
15 to order DDR to cease and desist from violating these statutes.

16 14. ORS 697.832(1) authorizes the Director to assess a civil penalty against DDR
17 of up to \$5,000 per violation of the Oregon Debt Management Service Provider Law.

18 **ORDERS**

19 Now therefore, the Director issues the following Orders:

20
21 15. As authorized by ORS 697.825(1)(a), the Director ORDERS DDR to CEASE
22 AND DESIST from violating ORS 697.612(1)(a) and ORS 697.692(1)(a).

23 16. As authorized by ORS 697.832(1), the Director ORDERS DDR to pay
24 \$10,000 in civil penalties, allocated as follows:

- 25 A. \$5,000 for violating ORS 697.612(1)(a) and
- 26 B. \$5,000 for violating ORS 697.692(1)(a).

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1 17. 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 which may be available to the Director
3 under Oregon law.

4
5 SO ORDERED this 24th day of February, 2020.

6 LOUIS SAVAGE, Acting Director
7 Department of Consumer and Business Services

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

12 **NOTICE OF RIGHT TO A JUDICIAL APPEAL**

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