

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

In the Matter of:

Case No. DM-19-0124

KJK GROUP INC., AKA  
NATIONAL CREDIT PROTECTION  
  
Respondent.

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

On April 13, 2020, the Director of the Department of Consumer and Business Services for the State of Oregon (“the Director”), through the Division of Financial Regulation (“the Division”), properly served KJK Group Inc., aka National Credit Protection (“NCP”), 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.

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

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

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

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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. NCP is a document preparation company purportedly at 6371 Haven Ave Ste.  
4 3-272, Rancho Cucamonga, CA 91737.

5 2. NCP is not registered with the Oregon Division of Financial Regulation (“the  
6 Division”) as a debt management service provider (“DMSP”) to conduct business in  
7 Oregon. NCP is also not registered with the Oregon Secretary of State to do business in  
8 Oregon.

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

13 4. NCP advertises on it’s website at [www.nationalcreditprotection.com](http://www.nationalcreditprotection.com) that it can  
14 help borrowers apply for loan repayment strategies and lower student loan payments.

15 5. On November 15, 2018, JS, an Oregon consumer, hired NCP to prepare a  
16 Borrower’s Defense to Repayment application and a General Forbearance Request to be  
17 filed with the DOE, as documented in a Document Preparation Agreement (“Agreement”)  
18 between JS and NCP.

19 6. The Agreement included a fee payment schedule for JS to pay an initial  
20 payment of \$200, which he paid, and three installment payments totaling \$499, for a total  
21 fee of \$699.

22 7. NCP requested JS’s Social Security number in order to access his Federal  
23 Student Aid loan information and apply for a general forbearance.

24 8. The Agreement stated that NCP would “prepare for filing an application to  
25 initiate a federal student loan consolidation through the DOE on behalf of client,” and at  
26 //

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1 the client’s option, NCP would “identify and prepare applications for other DOE-sponsored  
2 programs suitable for the client.”

3 9. It also states that NCP “will keep client updated on all progress and expected  
4 completion times”, “will continue to monitor your account and collect the necessary  
5 paperwork,” and will “work directly with you, the student loan borrower, advocating for  
6 your financial security”.

7 10. The Agreement also states that NCP will “verify past and present employment  
8 earnings records, bank accounts, stock holdings, and any other asset balances that are  
9 needed to process application request(s).”

10  
11 **CONCLUSIONS OF LAW**

12 The Director CONCLUDES that:

13 11. By completing and submitting JS’s General Forbearance Request to the DOE,  
14 as described in paragraph 5 of this Order, NCP modified or offered to modify the terms  
15 and conditions of an existing loan from or obligation to a third party.

16 12. By modifying or offering to modify the terms and conditions of an existing loan  
17 from or obligation to a third party, NCP performed a debt management service as defined  
18 in ORS 697.602(2)(c).

19 13. By performing a debt management service without being registered with the  
20 Division as a DMSP, NCP violated ORS 697.612(1)(a).

21 14. By charging JS an initial fee of \$200, NCP violated ORS 697.692(1)(a), which  
22 prohibits a DMSP from charging more than a \$50 initial fee.

23 15. ORS 697.832(1) authorizes the Director to assess a civil penalty against NCP  
24 of up to \$5,000 per violation of the Oregon Debt Management Service Provider Law.

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26



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

4 **ORDERS**

5 Now therefore, the Director issues the following:

6 17. As authorized by ORS 697.825(1)(a), the Director hereby ORDERS NCP to  
7 CEASE AND DESIST from violating ORS 697.612(1)(a) and ORS 697.692(1)(a).

8 18. As authorized by ORS 697.832(1), the Director hereby ORDERS NCP to pay  
9 Ten Thousand Dollars (\$10,000) in total civil penalties, allocated as follows:

10 A. Five Thousand Dollars (\$5,000) for violating ORS 697.612(1)(a) and

11 B. Five Thousand Dollars (\$5,000) for violating 697.692(1)(a).

12 19. This is a “Final Order” under ORS 183.310(6)(b). Subject to that provision, the  
13 entry of this Order does not limit further remedies which may be available to the Director  
14 under Oregon law.

15  
16 SO ORDERED this 11<sup>th</sup> day of June, 2020.

17 ANDREW R. STOLFI, Acting Director  
18 Department of Consumer and Business Services

19 /s/ Dorothy Bean

20 Dorothy Bean, Chief of Enforcement  
21 Division of Financial Regulation

22 **NOTICE OF RIGHT TO JUDICIAL APPEAL**

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

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