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3 **STATE OF OREGON**  
4 **DEPARTMENT OF CONSUMER AND BUSINESS SERVICES**  
5 **DIVISION OF FINANCE AND CORPORATE SECURITIES**

6 **BEFORE THE DIRECTOR OF THE DEPARTMENT**  
7 **OF CONSUMER AND BUSINESS SERVICES**

8 In the Matter of:

**DM-12-0052**

9 **World Law Group dba World Law**  
10 **Plan,**

**FINAL ORDER TO CEASE AND DESIST**  
**AND FINAL ORDER ASSESSING CIVIL**  
**PENALTY ENTERED BY DEFAULT**

11 Respondent.

12 On May 30, 2012, the Director of the Department of Consumer and Business Services for  
13 the State of Oregon (“the Director”), acting by the authority of the Oregon Debt Management  
14 Law, Oregon Revised Statutes Chapter 697, issued Administrative Order No. DM-12-0052,  
15 ORDER TO CEASE AND DESIST, PROPOSED ORDER ASSESSING CIVIL PENALTY,  
16 AND NOTICE OF OPPORTUNITY FOR AND ADMINISTRATIVE HEARING (the  
17 “Proposed Order”) against World Law Group dba World Law Plan (“World Law”).<sup>1</sup>

18 On May 31, 2012, the Division of Finance and Corporate Securities (“DFCS”) within the  
19 Department of Consumer and Business Services served a certified true copy of the Proposed  
20 Order on World Law by certified United States Mail, postage prepaid to 12655 N. Central  
21 Expressway, Suite 800, Dallas, Texas 75243 (Article No. 7008 1830 0003 3147 4632). The  
22 Proposed Order was also sent to World Law via regular mail to the address noted above, and by  
23 email to info@worldlawdirect.com.

24 On June 19, 2012, DFCS received a letter via facsimile from Texas attorney Bradley J.  
25 Haskins. Mr. Haskins states that he is outside counsel for World Law and is responding to  
26 DFCS’ May 31, 2012 letter.

<sup>1</sup> The entity named in this order should not be confused with World Law Group, Ltd., at the address of One Metro Center, 700 12<sup>th</sup> Street NW, Suite 700, Washington, DC 20005.





1 On July 5, 2012, DFCS wrote a letter to Mr. Haskins informing him that his letter had  
2 been received but that it is unclear whether World Law intends for his June 19, 2012 letter to  
3 serve as a request for a hearing on the issues in the Proposed Order. DFCS informed Mr.  
4 Haskins that if World Law “intends for the June 19 letter to serve as a hearing request, please  
5 confirm by written response to this letter no later than close of business on July 17, 2012.”  
6 Additionally, DFCS informed Mr. Haskins that “if World Law intends its June 19 reply to serve  
7 as its hearing request, such request must be ratified in writing by a person licensed to practice  
8 law in Oregon within 28 days of our receiving the hearing request (See OAR 137-003-0550(4)).”  
9 DFCS’ June 5, 2012 letter was sent to Mr. Haskins via First Class and Certified Mail to his  
10 address at 110 Wall Street, Floor 11, Suite 1100, New York, NY 10005. DFCS’ June 5, 2012  
11 letter was also sent to Mr. Haskins via facsimile at 1-866-827-4050.

12 On August 22, 2012, DFCS sent a second letter to Mr. Haskins informing him that unless  
13 DFCS receives written confirmation from World Law by September 21, 2012 that his June 18,  
14 2012 letter was intended to serve as a hearing request and proof that such request was ratified by  
15 Oregon counsel, DFCS intends to issue a Final Order to Cease and Desist and Order Assessing  
16 Civil Penalty by Default against World Law. DFCS’ August 22, 2012 letter was sent to Mr.  
17 Haskins via First Class and Certified Mail to the following addresses: (1) 110 Wall Street, Floor  
18 11, Suite 1100, New York, NY 10005; (2) 100 Congress Ave., Austin, Texas 78701; and (3) 334  
19 West Mistletoe Ave., San Antonio, Texas 78212. DFCS’ August 22, 2012 letter was also sent to  
20 Mr. Haskins via facsimile at 1-866-827-4050.

21 To date, World Law has failed to confirm that the June 19, 2012 letter received from Mr.  
22 Haskins was a hearing request or to have its hearing request ratified by a person licensed to  
23 practice law in Oregon, and time to do so has now expired.

24 NOW THEREFORE, after consideration of the file in this matter maintained by the  
25 DFCS, including any materials that World Law may have submitted, the Director hereby issues  
26 the following Finding of Fact, Conclusion of Law, and Final Orders.



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**I.**

**FINDINGS OF FACT**

The Director FINDS that:

1. World Law is believed to be a Texas entity with its principal address as 12655 N Central Expressway, Suite 800, Dallas, Texas 75243.
2. At all times relevant to this matter, World Law held itself out as providing debt management services as defined by ORS 697.602(2)(d), by receiving money in return for obtaining or attempting to obtain as an intermediary on a consumer’s behalf a concession from a creditor including, but not limited to, a reduction in the principal, interest, penalties or fees associated with a debt.
3. At no time material to this Order was World Law registered in Oregon with the Director as a debt management service provider.
4. At no time material to this Order did World Law file a bond with the Director as required by Oregon law.
5. At all times relevant to this matter, an individual identified as “JL” was a resident of the State of Oregon.
6. Between December 6, 2010 and October 19, 2011, JL paid World Law \$14,986.84 to receive debt management services. Specifically, during this time frame JL paid World Law \$540.57 a month and made one lump sum payment of \$8,500. Of each monthly payment, World Law retained \$312.32 as a “monthly fee” and \$84.95 as an “attorney evaluation fee.”

**II.**

**CONCLUSIONS OF LAW**

The Director CONCLUDES that:

7. World Law performed debt management services as defined by ORS 697.602(2)(d) when it received money in return for obtaining or attempting to obtain as an intermediary on a consumer’s behalf a concession from a creditor including, but not limited to, a reduction in the



1 principal, interest, penalties or fees associated with a debt.

2 8. World Law violated ORS 697.612 by engaging in the business of debt management  
3 service provider without being registered with the Director.

4 9. World Law violated ORS 697.642(1) when it performed debt management services  
5 without first filing a bond issued by one or more corporate sureties authorized to do business in  
6 Oregon.

7 10. World Law violated ORS 697.692(1)(d) when it charged an Oregon consumer fees  
8 that exceed \$65 per month to receive debt management services. Each month World Law  
9 charged a fee in excess of \$65 is a separate and distinct violation of ORS 697.692(1)(d).

10 **III.**

11 **FINAL ORDERS**

12 NOW, THEREFORE, THE DIRECTOR ISSUES THE FOLLOWING FINAL ORDERS:

13 Final Order to Cease and Desist

14 11. Pursuant to the authority of ORS 697.825(1)(a), the Director hereby ORDERS World  
15 Law, and all entities owned or controlled by World Law, their successors and assignees, to  
16 CEASE AND DESIST from violating any provision of the Oregon statutes regulating debt  
17 management service providers, ORS chapter 697, and any rule, order, or policy issued by the  
18 Director under ORS chapter 697.

19 Final Order Assessing Civil Penalty

20 12. Pursuant to the authority of ORS 697.832, the Director may assess a CIVIL  
21 PENALTY in any amount of not more than \$5,000 per violation against any person who violates  
22 ORS 697.612 or 697.642 to 697.702, rules adopted under ORS 697.632, or any order issued  
23 under ORS 697.825.

24 13. Pursuant to ORS 697.832, the Director hereby assesses World Law a CIVIL  
25 PENALTY in the amount of \$70,000 (seventy thousand dollars) as follows:

26 A. A CIVIL PENALTY of \$5,000 (five thousand dollars) for violating the registration

1 provisions of ORS 697.612 by engaging in the business of performing debt management  
2 services without being registered with the Director;

3 B. A CIVIL PENALTY of \$5,000 (five thousand dollars) for performing debt  
4 management services without first filing a bond as required by ORS 697.642(1); and

5 C. A CIVIL PENALTY of \$60,000 (sixty thousand dollars) for 12 violations of ORS  
6 697.692(1)(d) by charging monthly fees for debt management services that exceed \$65.

7 14. The entry of this Order in no way limits further remedies which may be available to  
8 the Director under Oregon law.

9 IT IS SO ORDERED.

10 Dated this 26th day of September, 2012 at Salem, Oregon,

11 NUNC PRO TUNC May 30, 2012.

12  
13 PATRICK M. ALLEN, Director  
14 Department of Consumer and Business Services

15 /s/ David Tatman  
16 David C. Tatman, Administrator  
17 Division of Finance and Corporate Securities

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Division of Finance and Corporate Securities  
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