

OCCC CASE NO. L25-025

IN THE MATTER OF:	§	BEFORE THE
	§	
MASTER FILE NO.: 1500053765	§	OFFICE OF CONSUMER
DOBLE A AUTO SALES LLC	§	
7224 HAZEL RD.	§	CREDIT COMMISSIONER
DALLAS, TEXAS 75217	§	
	§	STATE OF TEXAS

ORDER DISAPPROVING PLAIN LANGUAGE CONTRACT SUBMISSION

The Office of Consumer Credit Commissioner (“OCCC”) issues this Order Disapproving Plain Language Contract Submission against Doble A Auto Sales LLC (“Doble A Auto Sales”).¹

Statement of Facts and Law

Chapter 341 of the Texas Finance Code requires motor vehicle retail installment contracts entered under Chapter 348 of the Texas Finance Code to be written in plain language designed to be easily understood by the average consumer.² A creditor must use either a model contract adopted by rule of the Finance Commission of Texas or a contract that the creditor has submitted to the OCCC for plain language review.³ Non-standard contracts submitted to the OCCC must be printed in an easily readable type size, must be consistent with Texas and federal law, must include a notice with the OCCC’s contact information, and must not exceed a maximum Flesch-Kincaid grade level score.⁴ The contract’s text outside of the federal disclosure boxes must be at least as large as 8 points in the Times New Roman typeface.⁵

In September 2021, Doble A Auto Sales submitted a contract to the OCCC for plain language review. The submission form reflects that the form number for the contract is F006D, and that the contract is intended to be used under Chapter 348 of the Texas Finance Code. Doble A Auto Sales stated on its submission form that

¹ Tex. Fin. Code §§ 14.208, 341.502.

² Tex. Fin. Code § 341.502(a).

³ Tex. Fin. Code § 341.502(b)-(c).

⁴ 7 Tex. Admin. Code § 84.802(a)(1)-(5).

⁵ 7 Tex. Admin. Code § 84.806(d).

the size of the contract's text is 8 points. An OCCC examiner reviewed the contract and found that portions of the contract's text outside of the federal disclosure boxes are in a 6.5-point size. In July 2024, the OCCC sent a letter to Doble A Auto Sales describing this issue. Doble A Auto Sales did not respond to the OCCC's letter.

The contract submitted by Doble A Auto Sales includes provisions that are not at least as large as 8 points in Times New Roman. Therefore, Doble A Auto Sales' contract is not printed in an easily readable type size, and does not comply with Section 341.502 of the Texas Finance Code and its implementing rules.

Authority

If the Commissioner determines that a plain language contract does not comply with Section 341.502 of the Texas Finance Code or its implementing rules, then the Commissioner shall issue an order disapproving the contract.⁶ If the Commissioner issues an order disapproving a contract, a person may not use the contract after the order takes effect.⁷

The Commissioner has determined that the contract submitted by Doble A Auto Sales does not comply with Section 341.502 of the Texas Finance Code and its implementing rules. For this reason, the Commissioner issues this Order.

Order

IT IS ORDERED that:

1. The plain language motor vehicle retail installment contract submitted by Doble A Auto Sales, form number F006D, is DISAPPROVED.
2. Doble A Auto Sales must cease and desist using the motor vehicle retail installment contract with form number F006D.
3. **No later than 30 days after the date of this Order**, Doble A Auto Sales must provide the OCCC with a written statement acknowledging that Doble A Auto Sales has ceased and desisted using the version of form number F006D that was submitted to the OCCC. Doble A Auto Sales must send the

⁶ Tex. Fin. Code § 341.502(c).

⁷ Tex. Fin. Code § 341.502(d).

written statement by email to Audrey Spalding at
audrey.spalding@occc.texas.gov.

Violation of Order

If you violate this Order, the OCCC may impose an administrative penalty of up to \$1,000 for each day.⁸

Right to Request Hearing

You have the right to request a hearing regarding this Order.⁹ To request a hearing, you must send a written hearing request to the OCCC no later than 30 days after the date of this Order.¹⁰ You must send your request to Audrey Spalding, Assistant General Counsel, by mail to 2601 N. Lamar Blvd., Austin, TX 78705, or by email to audrey.spalding@occc.texas.gov.

If you request a hearing, a hearing will be set and conducted in accordance with Chapter 2001 of the Texas Government Code.¹¹ If you fail to request a hearing by this deadline, the Order will be considered final and enforceable.¹²

All communications with the OCCC concerning this matter must be through Audrey Spalding, Assistant General Counsel, who may be contacted by mail at 2601 N. Lamar Blvd., Austin, TX 78705, by telephone at 512-936-7659, or by email to audrey.spalding@occc.texas.gov.

Signed this 18th day of December, 2024.

/s/ Leslie Pettijohn
Leslie L. Pettijohn
Consumer Credit Commissioner
State of Texas

⁸ Tex. Fin. Code § 14.208(c).

⁹ Tex. Fin. Code § 14.208(b).

¹⁰ Tex. Fin. Code § 14.208(b).

¹¹ Tex. Fin. Code § 14.208(b).

¹² Tex. Fin. Code § 14.208(c).

CERTIFICATE OF SERVICE

I certify that on December 18, 2024, a true and correct copy of this Order Disapproving Plain Language Contract Submission has been sent to Doble A Auto Sales LLC by the following:

Doble A Auto Sales LLC
Attn: Armando Diaz,
Compliance Officer
7224 Hazel Rd.
Dallas, TX 75217
slsantonia@yahoo.com

- email
- eFileTexas.gov electronic service
- regular mail
- certified mail, return receipt requested
9214 8901 9403 8300 0092 0664 64

Doble A Auto Sales LLC
Attn: Armando Diaz,
Plain Language Contact Person
8301 Lake June Rd.
Dallas, TX 75217
diazslp@hotmail.com

- email
- eFileTexas.gov electronic service
- regular mail
- certified mail, return receipt requested
9214 8901 9403 8300 0092 0952 28

Doble A Auto Sales LLC
Attn: Doble A Auto Sales LLC,
Registered Agent
7224 Hazel Rd.
Dallas, TX 75217
slsantonia@yahoo.coM

- email
- eFileTexas.gov electronic service
- regular mail
- certified mail, return receipt requested
9214 8901 9403 8300 0092 0664 71

/s/Audrey Spalding
Audrey Spalding
Assistant General Counsel
Office of Consumer Credit Commissioner
State Bar No. 24111055
2601 North Lamar Blvd.
Austin, Texas 78705
512-936-7659 (phone)
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