



U.S. DEPARTMENT OF EDUCATION

BORROWER DEFENSE TO REPAYMENT APPLICATION

OMB Number: 1845-0163
Expiration Date: 06/30/2026

INSTRUCTIONS

You may be eligible to receive a discharge of your applicable federal student loans, if the school that you attended, or that your child attended if you are a parent PLUS borrower committed certain misconduct. This is called a "Borrower Defense to Repayment" discharge. The regulations that apply to this kind of situation are the Borrower Defense to Repayment Regulations. You can find them in the Code of Federal Regulations (C.F.R.) at Title 34, Sections 685.400-499.

If you believe that you may qualify for a Borrower Defense to Repayment discharge, you should complete this application. It outlines the types of misconduct by the school that might qualify you for relief. Once you submit this application, the U.S. Department of Education ("ED") will review your allegations. ED will also ask your school to respond to your claims. ED will then consider your application, any additional evidence you provide, any evidence in our possession, and any response received from your school. ED will notify you when the review is complete and a decision has been made. ED will generally make a decision on your application within three years from the date your application is determined to be materially complete. For more information, please visit the borrower defense website.

ED strongly encourages you to provide as much detail as possible in this application for your relevant claim or claims. That will help ED to better review your application. Everything in the application must be true and complete to the best of your knowledge.

What kind of conduct by the school can lead to an approved application?

1. You may qualify for a Borrower Defense to Repayment if a school or its representatives made untruthful or misleading statements while trying to convince you to enroll or to remain enrolled. You have to show that this information was important to you when you decided whether to enroll or remain enrolled. You also have to show that the misconduct caused you enough harm to justify a full discharge and refund of all applicable federal loans (34 C.F.R. 401(a)). The school's conduct must relate to untruthful or misleading statements concerning one or more of the following areas:

- Graduates' employment outcomes; for example:
 - Guarantees of employment; or
 - Guarantees that you would earn a certain salary.
- The school's educational programs; for example:
 - Whether completion of a program qualifies you for a specific license or certification;
 - The number, availability, and qualifications of instructors; or
 - Your ability to transfer credits to another school;
- The school's financial charges; for example:
 - The school's program cost; or
 - The availability or type of financial assistance available to you.

The school or its representatives could have made these untruthful or misleading statements directly to you, or in its marketing materials, websites, or other communications.

2. You may also qualify for Borrower Defense to Repayment if your school concealed, suppressed, or omitted certain information that would have been important to your decision of whether to enroll or remain enrolled, and the concealment caused you harm warranting a full discharge and refund of all applicable federal loans (34 C.F.R. § 685.401(a)). This includes conduct such as:

- A failure to provide important information about any of the three areas described above (i.e. graduates' employment outcomes; the school's educational programs; or the school's financial charges); or



- A failure to tell you that certain factors, like a criminal record or the program not being authorized by the appropriate agency, would prevent you from meeting requirements for employment in the program's field.
3. You may also qualify for Borrower Defense to Repayment if your school engaged in aggressive and deceptive recruitment tactics to convince you to enroll or to remain enrolled and caused you harm warranting a full discharge and refund of all applicable federal loans (34 C.F.R. § 685.401(a)). This includes conduct such as:
 - Demanding or pressuring you to enroll immediately, including by falsely claiming you would lose your opportunity to attend if you did not immediately enroll;
 - Taking unreasonable advantage of your lack of knowledge about higher education or financial aid to pressure you to enroll or take out loans;
 - Discouraging you prior to enrollment from discussing the decision to enroll with friends, family, or others;
 - Using threatening or abusive language; or,
 - Repeatedly contacting you if you asked not to be contacted further.
 4. In some circumstances, a lawsuit against a school may qualify you for Borrower Defense to Repayment. For the lawsuit to qualify, it must be based on the school's misconduct related to your decision to enroll or remain enrolled. It must have been brought by you, a government agency, or, if it's a class action lawsuit, have you included as a class member. In addition, it must have resulted in a favorable judgment (i.e., a judgment against the school and in favor of the plaintiff).
 5. Finally, in some circumstances, a school's failure to perform its obligations under a contract with you (such as in an enrollment agreement) may qualify you for Borrower Defense to Repayment. To qualify, those obligations must have been important to you when you were deciding whether to enroll or remain enrolled and caused you harm warranting a full discharge and refund of all applicable federal loans.

What must be included in the application?

ED can only consider complete applications. To be complete, an application must include at least the following information:

- A description in your own words of the statements, acts, or omissions that you believe qualify you for Borrower Defense relief;
- An explanation of who made the statements, acts, or omissions, or how they were made, and in what context;
- An approximation of when the statements, acts, or omissions happened;
- A description of how the statements, acts, or omissions affected your decision to enroll, to continue attending the school, or to take out the loan(s) related to your attendance at the school; and
- A description of the harm you suffered because of the school's statements, acts, or omissions.

ED recommends you provide as much as detail as possible in the sections below about the statement, act, or omission that you believe qualifies you for a Borrower Defense to Repayment. Additionally, ED recommends that you include the following documents:

- Documents that support your claim that your school lied to you or misled you, including: any e-mails or other communications between you and your school, course catalogs, student manuals, and any advertisements from your school.
- Documents that support your claim that there was a judgment against your school, including: a copy of the court's judgment, if available.
- Documents that support your claim that your school breached a contract with you if your claim is based on a breach of contract, including: a copy of the contract itself.
- Documents that show the date(s) of your enrollment and your program of study, including: enrollment agreements, transcripts, and diplomas.

Any other documentation that is related to the reason you are applying for Borrower Defense relief.

By completing this application, you are certifying, under penalty of perjury, that all the information provided is true and complete. This means that you could face criminal prosecution under the U.S. Criminal Code and 20 U.S.C. 1097 if you knowingly submit a false statement on your application.



SECTION 1: BORROWER INFORMATION

Please provide contact information for the borrower:

First Name	Middle Name	Last Name
GREG	MICHAEL	REYNOLDS

Date of Birth (mm/dd/yyyy)	Social Security Number	Telephone Number
08/17/1973	544-90-9915	(971) 220-3869

Email Address
PORTLANDSTATEGREG@GMAIL.COM AND/OR CORBETTGREG@COMCAST.NET

Street Address	City	State	ZIP Code
PO BOX 333	CORBETT	OR	97019

Are you a PARENT who took out a federal parent PLUS loan on behalf of the student?

☐ Yes ☒ No

If yes, please enter the full name of the student (*Last, First, Middle*): N/A

If yes, please enter the student's Social Security Number: N/A

SECTION 2: SCHOOL INFORMATION

School Name:
PORTLAND STATE UNIVERSITY

Campus Name (if you attended a multi-campus system or school):

Campus Location (City, State):
PORTLAND, OREGON

In what state(s) did you live during the enrollment period that is the subject of this claim? Please include the month/year when you lived in each state listed.

I have been a resident of Corbett, OR since 11/2002 through 4/2006, and again from 04/2011 through CURRENT as of 7/23/2024.

Enrollment dates at this school (month/year to month/year):
09/2002 to 08/2005 and again 09/2011 through 07/26/2012, which is also disability onset date per PSU, SSA, and the State of Oregon.

Are you still enrolled at this school? ☐ Yes ☒ No

Are the enrollment dates listed above approximate or exact? ☒ Approximate ☐ Exact

Program Name or Major (e.g., *Engineering, Law, Nursing*):
Business Administration for B.S., and Post-secondary Adult and Continuing Education for Master's program.



Credential/Degree Sought (e.g., Certificate, Diploma, Associates, Bachelor's, Master's):

Bachelor's of Science - Business Administration; awarded 08/2005, rescinded 2012.

working on Master's of Science of Education - Post-secondary, continuing, and adult education at the time of unconstitutional expulsion.

Current enrollment status at school listed above:

☐ Graduated ☐ Transferred Out ☒ Withdrew ** ☐ Attending **Unconstitutionally expelled 2012.

Note: if you are still enrolled at this school, indicate that you are "attending" even if, at the time you complete this application, you are on a scheduled break, an approved leave of absence, or have decided to not attend classes during the current term but plan to resume attendance in the near future.

What was your level of education at the time you enrolled (e.g. High School, GED, Certificate Program, Associate's Degree, Bachelor's Degree, Master's Degree, Doctorate Degree, Other)? If you are a parent who took out a federal parent PLUS loan on behalf of the student, what was the student's level of education at the time they enrolled?

GED at initial enrollment in 2002.

BS at time of admission in 2011. **There is now a question as to whether or not I was capable of entering into contracts at this time due to the disability diagnosed in 2012, which Portland State University had prior knowledge of. Why did they allow a disabled person to...

SECTION 3: CONDUCT THAT MAY RESULT IN A BORROWER DEFENSE APPROVAL

The following are common categories of misconduct alleged by borrowers, including some specific examples. You should only check the boxes that apply to you. Please select all that apply. If none of the categories apply to you, there is an "Other" category at the end of Section 3.

You **must** write out answers to the questions that follow the checkboxes in the space provided. The questions request additional information describing the misconduct, including information like what occurred, when it occurred, how it impacted you, and other details necessary to consider your application.

EMPLOYMENT PROSPECTS

Did your school misrepresent or fail to tell you about jobs that would be available to you, your prospects of obtaining a job, or the employment outcomes of prior graduates? Please select all that apply:

☒ My school misled me about my likelihood of obtaining a job, such as by misleading me about the number of graduates who were employed in the field of study the program was preparing them for.

☐ My school misrepresented its job placement rates.

☐ My school misrepresented the demand for graduates in my field.

☒ My school misrepresented its relationships with specific employers.

☐ My school misled me about my likely earnings after graduation by exaggerating the earnings of graduates.

☐ My school failed to tell me that obtaining a job or required licensure/certification in my field of study was highly unlikely due to my prior criminal history, a preexisting medical condition, or another circumstance known by my school.

☒ Other acts, statements, or omissions related to employment prospects, please identify:

As part of obtaining federal education funds student rights are protected by the Civil Rights Act of 1964, and the American's with disabilities Act. PSU had prior knowledge of my disability and had to hide their criminal activity with State of Oregon 11th Amendment immunity. [3:14-cv-01733-MO] PSU was acting in its capacity as the State of Oregon and therefor my disability onset date is 26 July 2012, the date of his unconstitutional expulsion. And recognition of the disability as, "permanent and irreversible." [sic] Document attached.

In the boxes below, you must describe the following information in detail and in your own words to ensure you have a materially complete application. If the acts or omissions you experienced occurred during different interactions with the school please include detail about each interaction. Please include any documentation you have supporting your responses.

- **What** did the school say, write, represent to you, or conceal, suppress, or omit from you? Please be as specific as possible. What did the school's actions lead you to believe?



I was told by phone that I had allegedly made "threats". I was never presented with this information and when I requested legal aid I was told, "at your own expense." I was disabled, this was a gross violation of the law, not to mention entrapment. I was also told that I was being suspended and was required to seek "mental health care", and forced to sign a medical release. Without legal aid. To further that, I my access to legal aid and health care was taken away and I was referred to Social Security Disability by PSU.

- **Who or what** provided you this information, or concealed, suppressed, or omitted this information from you (include the person's name and title, if known, or the source of the information such as a television advertisement, e-mail, or brochure)?

I learned most of my information from the PSU website, [www.reynoldsministires.org], or KOIN Local 6's coverage, which, to date, has never included my side of the story to spite their, alleged dedication to the truth and whole story. Which is only matched by PSU's dedication to their own Code of Conduct, the truth and the law.

- **When and where** were you told this information (for example, the approximate date or time of year and whether it was during a campus tour or interview, in a meeting, or over the phone)? If the school concealed, suppressed, or omitted information from you, please explain when and where you should have received this information.

I had requested legal counsel and was not given adequate time, as a disabled and unemployed person to obtain one before PSU went ahead, tired, convicted, and sentenced me in violation of my rights under federal and state laws as well as my constitutional rights under both. It has been ruled that these laws have not applied to Greg Reynolds since 1994 in Lane County, Oregon, did not apply at PSU, and will never be applied to Greg M. Reynolds. [https://drive.google.com/file/d/12W5X14xbrEnUeSwwNj7R3-GwVRjKFY/view?usp=drive_link]

- **How** was the information communicated to you or concealed, suppressed, or omitted from you (for example, via e-mail, in person, through an advertisement, through the school's website)? Please provide examples of the school's communication, if possible.

I received the infomtion either from KOIN Local 6 News broadcaset, or PSU's website. This also violated my student right to privacy. Another fact that was obscured by the 11th Amendment immunity in which they are protected from criminal activity.

- **How** was the information provided to you, or concealed, suppressed, or omitted from you, false or misleading and how did you determine the information was false or misleading?

Eventually I was forced to make threats against Jackie Balzzer, Dominic Thomas, and Michelle Toppe to stop their criminal activity and legal rights violations against me. It was my only access to legal aid. However, because the defense attorney admitted to not providing adequate defense, the legal bar for such a conviction being raised, the criminal activities which led to threats, this matter is subject to appeal with the US Department of Education also as a witness. All of this, and the witnesses are part of my SSA disability file.

- **Why** was the information provided to you, or concealed, suppressed, or omitted from you, important to you when you decided to enroll or remain enrolled (for example, you chose to attend this school over others or take out student loans because of the information you were provided)?

Because PSU had nothing, no threats. Please see statements from the Oregon Attorney General, Multnomah County District Attorney, Lane County DA, FBI, Secret Service, JTTF (Joint Terrorism Task Force), the Oregon Governors Office, and more at, www.reynoldsministires.org. All of which are also part of my SSA disability file. There was no Student Code of Conduct violation, which is why PSU had to deny a student their rights under the law. There is no other reason or excuse.

- **How** has the information provided to you, or concealed, suppressed, or omitted from you, caused you harm (for example, have you suffered financial harm, lost opportunities, or experienced other harm as a result)?

I have suffered horrible discrimination and abuse at the hands of the State of Oregon by many different departments. I have been left "permanently and irreversibly" [sic] disabled and will never work again. Even the US Department of Education has determined the law doesnt apply to me. See the dismissed cases, and the most rencent that has gone ignored for over 2 years, 08806503, so none of this information is new to the US Department of Educations. More info posted at www.reynoldsministries.org. Including communications with Office of Civil Rights affirming that the Constitution and Laws of the United States don't apply here. Please provide any other information you believe is important to this claim.

Most student loan information has been removed from www.reynoldsministires.org, it can however, be put back up at any time. All information and communications are subject to immediate release and public dissemination as Portland State University did to me and has been deemed as perfectly legal, and justified. Personal information will not be concealed as was done to me or it would further violate my 14th Amendment rights for equal protection of the law. All information at www.reynoldsministries.org, as well as this document are available to download and have been distributed to the press previously and or today.



CAREER SERVICES

Did your school misrepresent or fail to tell you important information about the scope and availability of the career services support it would provide? Please select all that apply:

- ☐ My school promised it would provide career services assistance (including, but not limited to resume writing help, mock interviews, and responding to job listings), but it did not.
- ☐ My school promised that it would find me a job when I graduated, but it did not.

☒ Other acts, statements, or omissions related to career services, please identify:

Portland State University failed to tell me that all constitutional rights, and protections of the laws of the United States and State of Oregon did not apply to Greg Reynolds. Nor they say they would be the leading State witness to my disability and denial of legal rights and representation under the law.

In the boxes below, you must describe the following information in detail and in your own words to ensure you have a materially complete application. If the acts or omissions you experienced occurred during different interactions with the school please include detail about each interaction. Please include any documentation you have supporting your responses.

- **What** did the school say, write, represent to you, or conceal, suppress, or omit from you? Please be as specific as possible. What did the school's actions lead you to believe?

PSU did not tell me they would destroy my life and cause so much harm to my family and friends.

- **Who or what** provided you this information, or concealed, suppressed, or omitted this information from you (include the person's name and title, if known, or the source of the information such as a television advertisement, e-mail, or brochure)?

The student brochures do not tell students that they must check their constitutional rights at the door. If you Google law suits against Portland State University, oddly I am the only student who cannot sue PSU, they hid their criminal behavior behind 11th Amendment immunity and left me, "permanently and irreversibly." [sic] disabled.

- **When and where** were you told this information (for example, the approximate date or time of year and whether it was during a campus tour or interview, in a meeting, or over the phone)? If the school concealed, suppressed, or omitted information from you, please explain when and where you should have received this information.

In 2012 I was informed that I would have a hearing for which I was not be allowed to attend, nor would I be allowed to be represented by legal counsel at. I was further ordered to receive treatment, which I did from Portland Adventist Medical Center. There are also civil rights matters with Portland Adventist Health as well as questions pertaining to my treatment there. Dr. Perry-Rose now works at the Oregon State Hospital and is always happy to discuss this case. Some of her statements are posted here, www.reynoldsministries.org Ms. Runkles-Pearson, PSU's attorney, is now employed at the Oregon Secretary of State's office and is always happy to speak with the press.

- **How** was the information communicated to you or concealed, suppressed, or omitted from you (for example, via e-mail, in person, through an advertisement, through the school's website)? Please provide examples of the school's communication, if possible.

Once again, the information wasn't provided to me because PSU did not have anything to support their allegations. As we can see from witness statements posted at, www.reynoldsministries.org. I know over 900 pages of FBI and Terrorism Task force working with District Attorneys' to accomplish nothing other than civil rights violations. Taxpayer dollars wasted.

- **How** was the information provided to you, or concealed, suppressed, or omitted from you, false or misleading and how did you determine the information was false or misleading?

After I was forced to make threats to defend myself after being denied legal aid, I was served with "discovery" as part of a federal criminal case. All discovery has been posted at www.reynoldsministries.org and shared with international press. As we can see, PSU had no case. IF they would have provided legal counsel, things would be different today. So would the last 13 years for a great many people as we will see in the complaint. All will also be used in future civil rights complaints and as legal defense should I get so much as a parking ticket. Does the apply there, if it doesn't here? Apparently the US Supreme court will have to decide. Was I mentally capable of entering into a student loan? Am I capable of tendering this application? My last one remains ignored and irrelevant, case 08806503. Remember?



- **Why** was the information provided to you, or concealed, suppressed, or omitted from you, important to you when you decided to enroll or remain enrolled (for example, you chose to attend this school over others or take out student loans because of the information you were provided)?

As previously discussed, when you don't have a criminal, civil, or Student Code of Conduct case, it does not behoove you follow the law, or provide for legal representation, or show anyone the proof that you have in any way. Which is why when I file ethics complaints against judges, or representatives or senators, I share those complaints publicly, and also here, www.reynoldsministries.org, just as PSU, the State of Oregon and others have shown me to be reasonable, prudent, just, and legal. They also gave me "paranoid delusional schizophrenia" to discredit the law, while expecting me to act as my own legal counsel and mental health professional.

- **How** has the information provided to you, or concealed, suppressed, or omitted from you, caused you harm (for example, have you suffered financial harm, lost opportunities, or experienced other harm as a result)?

Thankfully due to the nature and severity of the disability, I do not know or understand the difference between right and wrong. That has faced no objections in 13 years. At the same time I have been recognized by the State of Oregon as having all of the knowledge, skills, and abilities commensurate with acting my own legal defense since 1994 in Lane County, Oregon and since 2012 as affirmed by PSU. I have even have to act as my own attorney for Social Security were all of the aforementioned witness statements have also been entered, in absentia, as PSU, acting as the State of Oregon did to me. This document will also be used in future civil rights litigation and legal defense.

Please provide any other information you believe is important to this claim.

Alexander Choi representing the US Department of Education, as well as others have stated that the law doesn't apply to Greg M. Reynolds. Complaints have been filed with US Department of Justice, and also have concurred that the constitution and laws of the United States do not apply. These statements, as well lack of objection to, have become part of the public record as well as part of my Social Security disability file. My career has been destroyed. I will never work again.

ACCREDITATION AND LICENSURE QUALIFICATIONS

Did your school misrepresent or fail to tell you important information about your school's institutional or programmatic accreditation? Please select all that apply:

- ☐ My school misled me regarding whether my program had the accreditation necessary to qualify graduates for required licensure or certification or to sit for a licensing exam.
- ☐ My school misled me regarding the passage rate of graduates who sit for licensure or certification exams.
- ☐ My school failed to tell me that my school or program lacked proper accreditation or was not authorized by the appropriate agency in my state.
- ☐ My school failed to tell me that my school or program lost accreditation prior to or during my enrollment.

☒ Other acts, statements, or omissions related to accreditation, please identify:

Because PSU violated my student privacy rights, ADA rights, constitutional rights and rights under both state and federal law, I filed complaints with PSU's accrediting agency as well as the Oregon Higher Education Commission. [The commission has been disbanded] I also filed complaints with NCAA as PSU must comply with the law to obtain funds and accreditation. All concur that the constitutional rights of disabled people are irrelevant to society. [www.reynoldsministries.org] has many of their comments, taped conversations, etc. Per PSU and the State of Oregon's way handling these things.

In the boxes below, you must describe the following information in detail and in your own words to ensure you have a materially complete application. If the acts or omissions you experienced occurred during different interactions with the school please include detail about each interaction. Please include any documentation you have supporting your responses.

- **What** did the school say, write, represent to you, or conceal, suppress, or omit from you? Please be as specific as possible. What did the school's actions lead you to believe?

I believed that school followed the laws of the United States and State of Oregon as well as their own Code of Conduct. As the evidence demonstrates, that simply is not true.

- **Who or what** provided you this information, or concealed, suppressed, or omitted this information from you (include the person's name and title, if known, or the source of the information such as a television advertisement, e-mail, or brochure)?

I was in contact with the NCAA as well PSU's accrediting organization as well as every senator in the US Senate at time, and most US Representatives at the time fighting this injustice. All concur that the laws of the United States and the constitution do not apply to disabled Greg M. Reynolds, and that he posses all of the knowledge, skills and abilities to act not only as his own legal defense, but mental health professional just I am being forced to do here. Why are we waiting 3 years? Do you want to argue this every day for next three years? Again, www.reynoldsministries.org has taped conversations, recordings, emails and the side of the story, PSU didn't want you to hear.

- **When and where** were you told this information (for example, the approximate date or time of year and whether it was during a campus tour or interview, in a meeting, or over the phone)? If the school concealed, suppressed, or omitted information from you, please explain when and where you should have received this information.

Over the course of 2012 through 2016 information became available through public sources and because I had to threatened people in defense of my rights and for access to the materials being used against me. That is also part of a civil rights matter.

- **How** was the information communicated to you or concealed, suppressed, or omitted from you (for example, via e-mail, in person, through an advertisement, through the school's website)? Please provide examples of the school's communication, if possible.

Through the FBI, JTTF, US District Courts, KOIN Local 6, the University Vanguard, and PSU's website.

- **How** was the information provided to you, or concealed, suppressed, or omitted from you, false or misleading and how did you determine the information was false or misleading?

I or legal counsel never had an opportunity to defend it. As a paranoid delusional schizophrenic, did I even know or understand? If I did, why were my legal right suppressed? Could it be the \$100,000 in student loans? Most likely, it was lack of evidence or I my rights would have been upheld in accordance with the law.

- **Why** was the information provided to you, or concealed, suppressed, or omitted from you, important to you when you decided to enroll or remain enrolled (for example, you chose to attend this school over others or take out student loans because of the information you were provided)?

Again, when you don't have a case, you have to hide behind 11th Amendment immunity and prevent people from an adequate defense. Even when your accreditation depends on it. Thankfully PSU and the State of Oregon have taught me that law and the truth have nothing to do with right or wrong, or even guilt or innocence. What matters is you harming someone regardless of the truth, because that is what makes America great. Praise Jesus. [https://drive.google.com/file/d/12_SutlBK65jAqso8XOJiLvG1YQK9PLyS/view?usp=drive_link]

- **How** has the information provided to you, or concealed, suppressed, or omitted from you, caused you harm (for example, have you suffered financial harm, lost opportunities, or experienced other harm as a result)?

I will never work again, I cannot marry, I cannot have assets over \$2,000, I have suffered heart attacks.

Please provide any other information you believe is important to this claim.

This case also involves cases with US Capital police, Portland Police Bureau, the Oregon State Police, the State of Oregon Ombudsman's office, the Oregon Attorney General's office, and many others plus more added daily.

[https://drive.google.com/file/d/12lyvijnRtO-QURiuCc1DqpE5fsCEfFq0/view?usp=drive_link and https://drive.google.com/file/d/1ltyL5plhDpXn7LnLCs-H4gnXWj0vOyJD/view?usp=drive_link]

TRANSFERRING CREDITS

Did your school misrepresent or fail to tell you important information about transferring credits into or out of the school?

Please select all that apply:

- ☐ My school told me that my credits were transferrable to a specific school, but they were not.



- ☐ My school told me that the credits I earned at the school were generally transferrable to other schools, but they were not.
- ☐ My school failed to tell me that my credits would not transfer to other schools.
- ☐ My school told me it would accept credits I had earned elsewhere, but after I enrolled, it told me that it would not accept some or all of my transfer credits.
- ☒ Other acts, statements, or omissions related to transferring credits, please identify:
- Because of the aforementioned acts my credits are not transferable, or useable in any way as stated.

In the boxes below, you must describe the following information in detail and in your own words to ensure you have a materially complete application. If the acts or omissions you experienced occurred during different interactions with the school please include detail about each interaction. Please include any documentation you have supporting your responses.

- **What** did the school say, write, represent to you, or conceal, suppress, or omit from you? Please be as specific as possible. What did the school's actions lead you to believe?

As an accredited university I was entitled to all protects of the constitution, laws of US, ADA, and State of Oregon laws and constitution. None of that happened, or will it ever.

- **Who or what** provided you this information, or concealed, suppressed, or omitted this information from you (include the person's name and title, if known, or the source of the information such as a television advertisement, e-mail, or brochure)?

The university's obligation to follow the law are provided all over the place. In its mission, vision and values to the documents you sign when you apply to your financial aid documents. However, since those laws don't apply to me, I am able to publicly bash people just like PSU did to me. This is even supported by outgoing Rep. Earl Blumenauer, who even investigated this. I have since filed many congressional ethics complaints against Mr. Bluenauer. Released to the press and public here, www.reynoldsministries.org.

- **When and where** were you told this information (for example, the approximate date or time of year and whether it was during a campus tour or interview, in a meeting, or over the phone)? If the school concealed, suppressed, or omitted information from you, please explain when and where you should have received this information.

Every time I signed promissory notes. I have those, but have been temporarily pulled from the website, pending the outcome of this application. 2012 thorough current.

- **How** was the information communicated to you or concealed, suppressed, or omitted from you (for example, via e-mail, in person, through an advertisement, through the school's website)? Please provide examples of the school's communication, if possible.

All communication has ceased with PSU, I have to contact them through the press, Governor's office, or Oregon Attorney General. The Social Security Administration also maintains open communications.

- **How** was the information provided to you, or concealed, suppressed, or omitted from you, false or misleading and how did you determine the information was false or misleading?

Once again, there was not enough evidence to proceed in an other manner than to violate the rights of the a student to get the result they wanted. Be damned with the law and rights of others. Praise Jesus and PSU acting in their capacity as the State of Oregon.



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- **Why** was the information provided to you, or concealed, suppressed, or omitted from you, important to you when you decided to enroll or remain enrolled (for example, you chose to attend this school over others or take out student loans because of the information you were provided)?

It's hard to expel someone when you have no case. If you don't give them the evidence, bar them from all hearings, disallow them access to legal aid, and have them declared, "permanently and irreversibly" disabled [sic], well then, you don't have a lot to worry about. Do ya? And when the US Department of Education has "anointed" that the law. There you go.

- **How** has the information provided to you, or concealed, suppressed, or omitted from you, caused you harm (for example, have you suffered financial harm, lost opportunities, or experienced other harm as a result)?

Well, I had to threaten people to get access to legal aid. I have been left disabled. I have lived off of \$934 per month for 13 years since PSU, acting as the State of Oregon determined that I was "permanently and irreversibly" disabled [sic]. I will never work again, I will never have a career, I have my property seized without a hearing, and I fight this battle each and every day for the rest of my life as I have nothing better to do. Thank you Portland State University. How many other lives are they going to ruin without regard for the law?

Please provide any other information you believe is important to this claim.

All of this is why www.reynoldsministries.org was created to help other people understand your rights are a joke. They will take your things without hearing or trial. Your only hope is Jesus Christ, AR-15s and Donald Trump. Democracy and fairness are long dead. This case proves that.

EDUCATIONAL SERVICES

Did the school misrepresent or fail to tell you important information about the availability of the educational opportunities or support services it provided? Please select all that apply:

- ☐ My school misrepresented the availability of internships or externships or the assistance it would provide in obtaining required internships or externships.
- ☐ My school misrepresented the availability, or qualifications of its faculty.
- ☐ My school misrepresented the type and availability of any tutoring or specialized instruction or assistance it would provide me before, during, or after completion of a course.
- ☐ My school misrepresented how I would be taught (for example, in-person versus online).
- ☐ My school misrepresented the prerequisites required for my course of study.
- ☐ My school misrepresented how often required courses would be available or when those courses would be scheduled (e.g. you were promised you could complete the program by enrolling on weekends, but later learned that a required course was available only on weekdays during regular business hours when you work).
- ☐ My school misrepresented the number of credits required to graduate.
- ☐ My school told me I would be able to graduate in a certain amount of time, but then did not offer enough sections of required classes so that I could complete the program on time.
- ☐ My school failed to tell me that a different company was providing their curriculum instructional materials.
- ☐ My school failed to tell me that a different company was recruiting students on the school's behalf.
- ☐ My school misrepresented its status as a for-profit, nonprofit, or public institution.
- ☐ My school claimed to be a selective admissions school, but actually had an open-enrollment policy, meaning that they enrolled everyone regardless of their grade point average, test scores, volunteer experiences, or other entrance requirements.
- ☐ My school misrepresented its criteria for admission, meaning the basis upon which a school determines who it will admit.
- ☒ Other acts, statements, or omissions related to educational services, please identify:

Clearly PSU knew of the disability and other previous conditions which made my employability zero. Even after the disability became apparent, PSU still allowed student loans to be disbursed in their pursuit of the almighty dollar over the law.



In the boxes below, you must describe the following information in detail and in your own words to ensure you have a materially complete application. If the acts or omissions you experienced occurred during different interactions with the school please include detail about each interaction. Please include any documentation you have supporting your responses.

- **What** did the school say, write, represent to you, or conceal, suppress, or omit from you? Please be as specific as possible. What did the school's actions lead you to believe?

I think we have seen what was concealed, suppressed and left out. At the graduate level, I think everyone expected make their own niche when it came to employment just as much as the ideas and research you came up with on your own.

- **Who or what** provided you this information, or concealed, suppressed, or omitted this information from you (include the person's name and title, if known, or the source of the information such as a television advertisement, e-mail, or brochure)?

The University, everyone I was in contact omitted that they were a state institution as I was subject to the law and my constitutional rights. I did understand that until their "permanent and irreversibility." assessment of my situation was put onto paper. I am not subject to a medical review by the SSA until the year 2119. That's a lot of weight for a university. See attached BPQY report.

- **When and where** were you told this information (for example, the approximate date or time of year and whether it was during a campus tour or interview, in a meeting, or over the phone)? If the school concealed, suppressed, or omitted information from you, please explain when and where you should have received this information.

Per my own research post expulsion.

- **How** was the information communicated to you or concealed, suppressed, or omitted from you (for example, via e-mail, in person, through an advertisement, through the school's website)? Please provide examples of the school's communication, if possible.

Most of the information has been obtained through the "discovery" process of various lawsuits. Almost everything is posted on www.reynoldsministries.org and I share information with linkedin. If this is going to follow me, shouldn't it follow everyone?

- **How** was the information provided to you, or concealed, suppressed, or omitted from you, false or misleading and how did you determine the information was false or misleading?

Most of it wasn't true. I was suspended and expelled for making threats I did not make. And still cannot be proven. We can speak to the Lane County District Attorney about this. They were extensively in touch with PSU as we can see from FBI records.

- **Why** was the information provided to you, or concealed, suppressed, or omitted from you, important to you when you decided to enroll or remain enrolled (for example, you chose to attend this school over others or take out student loans because of the information you were provided)?

When you have no case, but you need a conviction, just like Lane County did in 1994, PSU did it in 2012. Oregon has a long, rich history of wide spread abuse and misconduct. Any Google search will demonstrate that. In fact, Judge Mosman, who sat on both of my federal cases and was the subject of my ethics complaint since the Judge who denied my constitutional right to legal counsel in Lane County, 1994, worked for him. Complaints posted at www.reynoldsministries.org, in accordance with State of Oregon and PSU policy. Supported by the US Department of Education.

- **How** has the information provided to you, or concealed, suppressed, or omitted from you, caused you harm (for example, have you suffered financial harm, lost opportunities, or experienced other harm as a result)?

This entire document and www.reynoldsministries.org is a testament to the harm that the actions of PSU acting as an agent of the State of Oregon have caused and continue to cause. "Permanently and irreversibly." [sic]



Please provide any other information you believe is important to this claim.

Please do continue reading. I may not attach exhibits, since they are all posted at, www.reynoldsministries.org. Praise Jesus.

PROGRAM COST AND NATURE OF LOANS

Did the school misrepresent or fail to tell you important information about the cost of your program or the nature of your loans? Please select all that apply:

- ☐ My school told me I was receiving only grants and scholarships, but I found out later that some or all of those funds were loans.
- ☐ My school misrepresented the repayment terms or total cost of the loans that it arranged for me, provided to me, or that were provided to me by a lender the school recommended.
- ☐ My school misrepresented the overall cost of my program.
- ☒ My school misrepresented what costs were or were not included in the published tuition and fees.
- ☐ My school misrepresented the cost of living in campus-owned or campus-operated housing.
- ☐ My school offered me a full scholarship when admitting me to the school, but then reduced the scholarship amount or failed to renew the scholarship even though I met the scholarship requirements, such as by maintaining a certain GPA, enrolling in a particular program, performing required community or volunteer service, or some other criteria that I satisfied.
- ☒ Other acts, statements, or omissions related to program cost and nature of loans, please identify:

Included with tuition was legal aid and health care. Upon suspension these services were taken away and I was advised to get on disability or that I had all of the knowledge, skills and abilities to defend myself. First of all, there is a lot wrong here. Second, PSU demanded they have unfettered access to my medical file, so they knew of the Portland Adventist diagnosis of disabled. Then I was expelled. I wasn't a student at the university. I wasn't given any ADA accommodations at all. How many laws were broken? And as we can see, at www.reynoldsministries.org, knowingly and intentionally with malice and I had no defense at all, except to make threats.

In the boxes below, you must describe the following information in detail and in your own words to ensure you have a materially complete application. If the acts or omissions you experienced occurred during different interactions with the school please include detail about each interaction. Please include any documentation you have supporting your responses.

- **What** did the school say, write, represent to you, or conceal, suppress, or omit from you? Please be as specific as possible. What did the school's actions lead you to believe?

Campus public safety came to my home, 22 miles from campus. Because they knew, I had no constitutional rights. They even brought the Multnomah County sheriff with them because they knew they would have to observe my rights where PSU safety officers did not. See FBI report at www.reynoldsministries.org. Part of my disability file is the permanent "1-2-3-4" status on me and "minimum 3 car response" required by the Multnomah County Sheriff's office. Guilty until proven innocent. Also on part of my SSA disability file.

- **Who or what** provided you this information, or concealed, suppressed, or omitted this information from you (include the person's name and title, if known, or the source of the information such as a television advertisement, e-mail, or brochure)?

As you can see from the FBI file at www.reynoldsministries.org, there was almost 900 pages concealed, suppressed and omitted from me. Now its available for the whole world to see just like PSU did to me. Praise Jesus.

- **When and where** were you told this information (for example, the approximate date or time of year and whether it was during a campus tour or interview, in a meeting, or over the phone)? If the school concealed, suppressed, or



omitted information from you, please explain when and where you should have received this information.

No documents were provided except in 2014 as part of discovery for criminal proceedings. It was my only access to legal aid. Never at any meetings was paper information provide even when asked for. Legal counsel was denied when asked for. From 2012 through 2014. When my application for TPD was tendered in 2016, it was ignored until now. Had it been handled properly it would have been discharged in 2019 making his moot. However, we now have 3 more years to discuss it. It already is part of my SSA disability file and being used to demonstrate how the laws don't apply to me. Even the the US Department of Education knew. Guess where you can find documentation?

- **How** was the information communicated to you or concealed, suppressed, or omitted from you (for example, via e-mail, in person, through an advertisement, through the school's website)? Please provide examples of the school's communication, if possible.

Some of the information became known to me through communications with the US Department of Education. See www.reynoldsministries.org for some of those communications.

- **How** was the information provided to you, or concealed, suppressed, or omitted from you, false or misleading and how did you determine the information was false or misleading?

Once again, PSU spoke with many agencies only to find they had no case and had to deny me my rights under the law in order to try, convict, sentence and impose a life sentence of disability and inability to work.

- **Why** was the information provided to you, or concealed, suppressed, or omitted from you, important to you when you decided to enroll or remain enrolled (for example, you chose to attend this school over others or take out student loans because of the information you were provided)?

Because PSU and the State of Oregon had a disabled person, it was easier to conceal the fact that they had no case by denying legal counsel as they had done in 1994 and continue to do to this day. Fortunately, non responses can be entered into evidence as PSU has done to me.

- **How** has the information provided to you, or concealed, suppressed, or omitted from you, caused you harm (for example, have you suffered financial harm, lost opportunities, or experienced other harm as a result)?

I have lost my professional licenses in 2 states, Oregon and Washington. See www.reynoldsministries.org. I have been deemed, "permanently and irreversibly." [sic] disable with no recourse, had my property seized without hearing, been expelled from a college I wasn't even a student at, had my reputation ruined, denied my rights to life, liberty and the pursuit of happiness for 13 years.

Please provide any other information you believe is important to this claim.

Donald Trump will fix the US Department of Education the State of Oregon in a way they can understand. A good dose of their own medicine. Praise Jesus and God Bless America for that!

AGGRESSIVE AND DECEPTIVE RECRUITMENT

Did the school pressure you to make an enrollment decision immediately, take unreasonable advantage of your lack of knowledge about higher education and financial aid, use abusive language, or repeatedly contact you after you told them to stop? Please select all that apply:

- ☐ My school pressured me to enroll or to make loan-related decisions immediately.
- ☐ My school told me that I would lose my place or my financial aid if I did not enroll right away.
- ☐ My school discouraged me from discussing my decision with family members or reviewing other resources prior to enrolling or making loan-related decisions.
- ☒ My school pressured me to enroll or to make loan-related decisions without giving me enough time to review the relevant documents.



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- ☒ My school took unreasonable advantage of my lack of knowledge about higher education or financial aid to pressure me into enrolling or taking out loans to attend the school.
- ☐ My school used abusive or threatening language while trying to get me to enroll.
- ☐ My school repeatedly contacted me for the purposes of enrolling or re-enrolling after I asked them to stop.
- ☒ Other aggressive and deceptive recruitment tactics, please identify:

I was not allowed to review or defend myself against any of the allegations at any time, I was not allowed to have anything reviewed by legal counsel and instead was forced to do it myself as I still must to do this day as a legally recognized attorney by the State of Oregon, US Department of Education, Portland State University, the Oregon Department of Justice, the US Department of Justice. Apparently I am also a recognized "mental health professional" according to PSU or they wouldn't have taken my access to medical care and referred me to Social Security for disability.

In the boxes below, you must describe the following information in detail and in your own words to ensure you have a materially complete application:

- **What** were the aggressive and deceptive recruitment tactics that were used? Please be as specific as possible.

I have certain rights under the ADA and civil rights act. The US Department of Education usually requires these laws and rights to be upheld in order to obtain funds. There have special exceptions made for this case. Why wouldn't we make a special exception for this 3 year monitoring period. I will each and every day give you something to monitor. I assure you of that. Praise Jesus and God Bless America.

- **Who** used these aggressive and deceptive recruitment tactics (include the person's name and title, if known)?

Each and every member of the Board of Trustees. [www.reynoldsministries.org] Jackie Balzer, Portland Adventist Health [now OHSU, and they have been apprised of the legal liability stemming from my time there with Dr. Perry-Rose] The president of PSU, Dr. Ann Cudd. Dr. Jackie Balzer, Dominic Thomas, Michelle Toppe, just to name a few. [www.reynoldsministries.org]

- **When and where** did you experience this conduct (for example, the approximate date or time of year and whether it was during a campus tour or interview, in a meeting, or over the phone)?

2012 and much of the misconduct continues to this current day and will continue permanently per the Oregon Supreme Court.

- **How** did you experience this conduct (for example, via e-mail, in person, through an advertisement, through the school's website)?

My rights were violated and continue to be violated each and every day of my life.

- **How** was this conduct aggressive and deceptive?

Most people have rights under the law. This was not the case here.

- **How** did the conduct influence your decision to enroll (for example, because of the school's conduct, you enrolled without consulting friends and family)?

My family paid money while I was disabled these unscrupulous people. We are awaiting refunds now.



-
- **How** has the school's conduct caused you harm (for example, have you suffered financial harm, lost opportunities, or experienced other harm as a result)?

I am not sure there is enough space to demonstrate the amount of harm caused not just to me, but the people of Oregon, disabled peoples rights everywhere, the educational community, and look at downtown Portland. The policies of the people like those mentioned here have left Portland a violent wasteland of desperation and despair. The State of Oregon has a long history of marginalizing people of race and the poor. My case is no exception. My only crime was being disabled and sexually abused.

Please provide any other information you believe is important to this claim.

There really isn't a lot more to add. Every day I have to think about something I did not do, shouldn't someone else suffer for that too? Otherwise it would violate my rights under the 14th Amendment to equal protection of the law. This has never been challenged.

JUDGMENT

Has a court awarded a favorable judgment against your school?

Specifically, do any of the following apply to you?

- I filed a lawsuit against my school and won a favorable judgment in a Federal or state court;
- I filed a claim against my school and won a favorable judgment from a Federal or state administrative tribunal;
- I was a class member in a class action lawsuit and won a favorable judgment or I benefited from a government enforcement action where the government won a favorable judgment that related to the making of a covered loan, or the provision of educational services for which the loan was provided.

☐ Yes ☒ No

Note: A settlement does not qualify you for Borrower Defense relief even if the settlement was favorable to you. A settlement agreement is not a favorable judgment for the purposes of Borrower Defense relief.

How much was awarded to you in the judgment or court order?

N/A

Please attach the judgment (i.e. the court order or opinion) and all relevant documents relating to your judgment(s). If you don't have a copy of the court documents, please provide as much information as you can about the judgment or order, including the approximate date (month and year) it was obtained, the court or tribunal where the case was heard, and the name of the plaintiff(s) if you were not a named plaintiff (for example, in the case of a class action).

BREACH OF CONTRACT

Did your school breach a contract with you?

First, did you ever enter into a contract with your school (e.g., did you sign an enrollment agreement when you enrolled? Or, did you sign an agreement regarding a scholarship or other financial aid benefit)?

☒ Yes ☐ No

Second, did your school fail to perform any obligations under the contract?

☒ Yes ☐ No

Please attach the contract and all relevant documents.

Please describe, in as much detail as you can, the ways in which you believe the school failed to perform its obligations under any contract it entered into with you.

The "master promissory note", not only describes the terms and conditions for the student, it also outlines the laws the US Department of Education and school must observe. Including but not limited to the Americans with Disabilities Act, the Constitutional rights of students, as well as state and federal laws. PSU, the State of Oregon, and US Department of Education failed to do all of these things.

OTHER

Did your school misrepresent or fail to tell you about important information other than what you have already described in this application?

☒ Yes ☐ No

If yes, please identify what the school misrepresented or failed to tell you:

I was not told that my prior criminal history was a disability. I was not told that my prospects for any employment at all were zero. PSU allowed a disabled person, to get \$100,000 in student loans. Yet expelled them without a hearing, trial or administrative law review. PSU was acting as an agent of the State, so they knew about the disability, took the money, and promptly expelled the person with their money. PSU had no evidence of violations of the student code of conduct so denying a disabled person their right to legal counsel was their only option. Many people connected to this case have been rewarded with jobs at the Secretary of States office and the Oregon State Hospital. www.reynoldsministries.org tracks many of them as they are criminals. Dont they deserve to be treated like me?

In the boxes below, you must describe the following information in detail and in your own words to ensure you have a materially complete application:

- **What** did the school say, write, represent to you, or conceal, suppress, or omit from you? Please be as specific as possible. What did the school's actions lead you to believe?

Violations of the student code of conduct. To date, I have never been presented with the evidence.

- **Who or what** provided you this information, or concealed, suppressed, or omitted this information from you (include the person's name and title, if known, or the source of the information such as a television advertisement e-mail, or brochure)?

PSU campus public safety called me, PSU emailed me about "hearings". When I requested legal counsel I was told to get it myself. PSU knew I was disabled. They are the diagnosing agency. They knew at admission. They used my drivers license photo because they were acting in their capacity as the State of Oregon. They concealed evidence because they had none. They denied access to legal aid to a disabled person because they had no proof of code of conduct violations. They could not allow me access to legal aid or campus because they had nothing. They had to release information to the public like I do now, without proof. www.reynoldsministries.org

- **When and where** were you told this information (for example, the approximate date or time of year and whether it was during a campus tour or interview, in a meeting, or over the phone)? If the school concealed, suppressed, or omitted information from you, please explain when and where you should have received this information.

In the summer of 2012 I was held at PSU's request at PAMC. My rights were violated, I had no attorney, still dont and have never been able to confront any of my accusers or provide a defense per the law, code of conduct, US Department of Education. I learned most of what was going on the air over KOIN Local 6 News. Their statements are here, www.reynoldsministries.org and part of my social security disability file. If I did not get to speak, why would they be able to? Praise Jesus!

- **How** was the information communicated to you or concealed, suppressed, or omitted from you (for example, via e-mail, in person, through an advertisement, through the school's website)? Please provide examples of the

I was told of "hearings" for violations of student code of conduct. By phone and email. I was barred from campus I found out online and on KOIN Local 6 News, but have never seen the allegations against me.



school's communication, if possible.

- **How** was the information provided to you, or concealed, suppressed, or omitted from you, false or misleading and how did you determine the information was false or misleading?

TO date, I have never been provided with witness statements, complaints, or other evidence as to why I was expelled or suspended. I was required to sign releases and PSU acting as the State of Oregon knew this.

- **Why** was the information provided to you, or concealed, suppressed, or omitted from you, important to you when you decided to enroll or remain enrolled (for example, you chose to attend this school over others or take out student loans because of the information you were provided)?

PSU could not prove that I threatened anyone so they could not provide legal aid per the law or the student code of conduct they referred to. PSU was later found to be acting as an agent of the State of Oregon when they denied my rights under the laws and took 11th Amendment immunity. They could not take that unless their acts were official acts of the State. Therefore, my disability has been accepted as, "permanent and irreversible" per the State of Oregon on July 26th, 2012. The date of expulsion. Uncontested.

- **How** has the information provided to you, or concealed, suppressed, or omitted from you, caused you harm (for example, have you suffered financial harm, lost opportunities, or experienced other harm as a result)?

I will never work again. I cannot marry. I cannot have assets over \$2,000. I have had my property in Klamath Falls, Oregon taken. I am a disabled, legally recognized attorney and mental health professional by PSU acting in their capacity as the State of Oregon. My only employment prospects are televangelist or politician and until both the 1994 Lane County case and the 2 federal cases are overturned, that recognition is "permanent and irreversible." [sic]

Please provide any other information you believe is important to this claim.

There are a number of cases related to this case and claims made here, they include, but are not limited to: Oregon Supreme Court A182808, 10-93-10439, US DOJ 373469-KTR, OR Governors Advocacy office, OR Governors Office, Portland Police Bureau, Multnomah County Sheriff's office, Oregon State Police, Portland Adventist Health, Lane County District Attorneys office, US Department of Education, Office of Judicial Fitness and Disability [per the Governors request], the Oregon Department of Justice, Rep. Earl Blumenauer, the FBI, US District Court of Oregon cases, 3:14-EV-01733-MO, 3:14-CR-00317-MO, Social Security Administration the Office of Congressional ethics, Portland Adventist Medical Center, the Oregon Health Authority, the Oregon HA Ombudsman, KOIN Local 6 News all have statements posted at www.reynoldsministries.org and available by request per FIOA.

SECTION 4: HARM

Above, you were required to explain how each specific type of misconduct by your school caused you harm. Please use the space below as an opportunity to explain how all the misconduct, taken together, caused you harm, and how the misconduct of the school has impacted your life more broadly.

- **What** harm did you experience as a result of the school's statements, acts, or omissions? (For example: because your credits did not transfer you had to start over at a different school; you were unable to find a job when you graduated; you do not have the certification the school promised you would obtain and are now unable to enter your field of study.)

I have been left, "permanently and irreversibly" disabled per PSU. I will never work again, I am limited to assets of less than \$2,000, by the rules of SSI. I cannot marry or I will lose my disability. I have been forced to act as a disabled attorney since 2012, I have learned that the only good mental health professional is a dead mental health professional. I have learned that every day I have to suffer for something I did not do, shouldn't I punish the people of Oregon too? I am a social outcast, I had my private personal information broadcast on KOIN Local 6 News without my side of the story told. I was expelled from an institution I wasn't even a student at because of being expelled. I had my rights under the constitution of the United States, State of Oregon, Americans with Disabilities Act rights, as well as state and federal legal rights. I have found out that due the statute of limitations that the laws of this nation, did not apply years ago, they do not apply today, and will never be applied in the future. I will have to go to the United States Supreme Court forever over so much as a parking ticket because of what PSU and the US Department of Education have done.



- **How** did the school's statements, acts, or omissions cause you this harm?

Well. I was expelled without a hearing, trial, or administrative review. I had my access to health care and legal taken away from me and have been acting both ever since. I lost my professional licensure in Oregon and Washington as insurance producer. I have been left, "permanently and irreversibly" disabled, had my student privacy rights, ADA rights, and constitutional right trampled. I actually had to make threats to get access to legal aid, I will never work again. I cannot marry, I cannot have assets with value of \$2,000, I live on \$943 a month. "permanently and irreversibly"

- **How** has your life been impacted by this harm?

I will never work again. I have a permanent "1-2-3-4 status" and "minimum 3 car response" on my home with the Multnomah County Sheriff's department. [www.reynoldsministries.org] PSU had their side of the story broadcast on KOIN Local 6 News, but to this day my side has never been told. What is on reynoldsministries.org pales in comparison to what I still have to release. Recorded conversations, emails, and sometimes video and photographic evidence. I act as my own attorney each and every day, legally recognized by PSU, the US Department of Education, the State of Oregon, KOIN Local 6 News and others. See www.reynoldsministries.org for much more. I cannot marry, I have no legal recourse, I live on \$943 a month, I have been sentenced for something I did not do by an illegal act. I suffer horrible discrimination every day with no relief. My governor, my senators, my representatives, all agree, this is justice. So does the Oregon Supreme Court. Jesus Christ, Donald Trump and AR-15s are our only hope. Praise Jesus.

SECTION 5: OTHER REFUNDS, REMEDIES, LOAN REDUCTION OR TUITION RECOVERY ACTIONS

Have you recovered the amount of tuition or fees that you paid to your school or had your student loans forgiven? (For example, did you get a closed school loan discharge or total and permanent disability discharge from the U.S. Department of Education? Did you get relief as part of a class-action lawsuit or other settlement?)

☐ Yes ☒ No

If yes, please describe this other relief, including the amount of financial relief received, and attach any documentation about the relief, if available.

My loans were approved for discharge on 07/08/2024 and am now subjected to the 3 year monitoring period. I however, feel that since the law doesn't apply to me anyhow, see Mr. Choi's statements on www.reynoldsministries.org, and the US Department of Education has no intention of applying the law, that the 3 year monitoring period should not apply. Had the Department of Education tendered my application correctly in 2019, this would have concluded in 2022. However, we now have 3 more years to discuss and argue what went on in 2012. After all, my disability onset date is the same date PSU, acting in its capacity as the State of Oregon, determined I was "permanently and irreversibly" disabled. [PSU, www.reynoldsministries.org, 3:2014cv01733, KOIN.com, SSA] Due to the statute of limitations the Oregon Supreme Court ruled the constitution and all legal remedies will never apply. Documents can be retrieved at: www.reynoldsministries.org or the Oregon Department of Justice.

SECTION 6: FORBEARANCE AND STOPPED COLLECTIONS

You have the option to request forbearance or stopped collections status.

If you are not currently in default on any federal student loan, your loans will be put into **forbearance** while your application is under review. "Forbearance" means that you do not have to make loan payments and your loans will not go into default while your application for a Borrower Defense discharge is pending with the U.S. Department of Education. Your servicer will notify you when your loans have been placed into forbearance status.

If any of your federal student loans are in default, your loans will be put into **stopped collections status** while your application is under review. "Stopped collections status" means that the holder of your defaulted loan will not attempt to collect on the defaulted loan(s), including efforts to withhold money from your wages or federal income tax refunds, while your Borrower Defense application is pending with the U.S. Department of Education.

If you have more questions about forbearance or stopped collections, visit StudentAid.gov/borrower-defense or contact your servicer. If you do not know who your servicer is, please visit StudentAid.gov/aid-summary or call 1-800-4-FED-AID.

Interest will continue to accumulate on all federal student loans regardless of their status, including subsidized loans, for the first 180 days after you are granted forbearance or stopped collections status. If your application is pending for more than 180 days, no further interest will accumulate until you are notified of the Department's determination in your case.

If your application for Borrower Defense is denied, the total amount you owe on those loans may be higher. If you wish to make interest payments while your loans are in a forbearance or stopped collections status, please contact your servicer.

You do not have to place your loans in forbearance or stopped collections to apply for Borrower Defense relief. Instead, you may continue making payments on your loans, especially if you are in a repayment program like loan rehabilitation to

remove your loans from default or are seeking loan forgiveness through a program such as the Public Service Loan Forgiveness or Income-Driven Repayment Forgiveness programs.

You can learn more about repayment options at <https://studentaid.gov/manage-loans/repayment/plans>, including income driven repayment options at <https://studentaid.gov/idr/>.

Do you wish to request that your loans not be placed into forbearance, meaning that you will need to continue making student loan payments while your application is being reviewed?

☒ **I wish to have my loans placed into forbearance or stopped collection status.**

☐ **I DO NOT wish to have my loans placed into forbearance or stopped collections.**

If you do not select one of the options above and you are not in default on a federal student loan, ED will automatically place your federal student loan(s) into forbearance during our review of the application and the issuance of a decision.

If you do not select one of the options set forth above and you are in default on a loan, ED will place the federal student loan(s) that is (are) the subject of your Borrower Defense application into stopped collection status during our review of the application and the issuance of a decision.

ED will also ask holders of Federal Family Education Loan (FFEL) program loans not held by ED to make these same changes.

SECTION 7: CERTIFICATION

**By signing this attestation, I certify, under penalty of perjury, that:
all of the information that I provided is true and complete.**

Any person who knowingly makes a false statement or misrepresentation on this form or on any accompanying document is subject to penalties that may include fines, imprisonment, or both, under the U.S. Criminal Code and 20 U.S.C. 1097. I sign this application under penalty of perjury.

I also agree to the following: to provide to the U.S. Department of Education additional information that is reasonably available to me that will verify the accuracy of my completed attestation and to provide, upon request, testimony, a sworn statement, or other documentation reasonably available to me that demonstrates to the satisfaction of the U.S. Department of Education or its designee that I meet the qualifications for Borrower Defense relief.

I also certify that I received proceeds of a federal loan, in whole or in part, to attend the school/campus identified in Section 2 above.

I also certify that I relied upon the misrepresentations and/or omissions identified in Section 3 above when enrolling at the school, and that the misrepresentations and/or omissions were material to my decision to enroll.

I also certify that I have not received a refund, tuition recovery, settlement, or other financial restitution to repay the loans that are the subject of this Borrower Defense claim, except as otherwise disclosed in my application.

I understand that if my application is approved and some or all of my loans are forgiven, I am assigning to the U.S. Department of Education any legal claim I have against the school for those forgiven loans. By assigning my claims, I am transferring my interest in any claim that I could make against the school relating to the forgiven loans (including the ability to file a lawsuit over those forgiven loans and any money ultimately recovered in compensation for those forgiven loans in court or other legal proceedings) to the U.S. Department of Education. I am not assigning any claims I may have against the school for any other form of relief — including injunctive relief or damages related to private loans, tuition paid out-of-pocket, loans not forgiven by the Department, or other financial losses.

I understand that the U.S. Department of Education has the authority to verify information reported on this application



with other federal or state agencies or other entities. I authorize the U.S. Department of Education, along with its agents and contractors, to contact me regarding this request at the phone number above using automated dialing equipment or artificial or prerecorded voice or text messages.

I understand that any rights and obligations with regard to Borrower Defense are subject to the provisions currently in effect under Title 34 of the Code of Federal Regulations.

I agree to allow the school that is the subject to this Borrower Defense application to provide the Department with items from my student educational record relevant to this Borrower Defense application.

If one or more of the loan(s) that was made for me to attend the school that is the subject of this Borrower Defense application is a federal non-Direct loan and my application is approved for a Borrower Defense discharge, I agree that the U.S. Department of Education will consolidate those loans into a Direct Consolidation Loan to the extent allowed by law and regulation if necessary to effectuate my discharge.

If a Federal Direct Consolidation is needed to effectuate my discharge, I authorize:

- A. The U.S. Department of Education to contact the holders of the loans I have selected for consolidation to determine the eligibility for consolidation and the payoff amounts of the loans to be consolidated and discharged;
- B. The holders of the loans I want to consolidate to release any information required to consolidate my loans, in accordance with the law, to the U.S. Department of Education or its agents and contractors; and
- C. The U.S. Department of Education to pay the full amount I owe to the holders of the loans that I want to consolidate to pay off those loans.

I agree that the U.S. Department of Education and their agents and contractors may contact me regarding my Borrower Defense application or my loan(s) at any cellular telephone number I provide now or in the future using automated dialing equipment or artificial or prerecorded voice or text messages.

Signature

Date

07/26/2024

ED recommends submitting this form online at StudentAid.gov/borrower-defense. If you wish to complete the form manually, please mail the completed form and documentation to:

U.S. Department of Education,
Federal Student Aid Information Center
P.O. Box 1854, Monticello, KY 42633.

If you have questions about your individual submission, please visit StudentAid.gov/help-center/contact or contact the Borrower Defense Customer Contact Center at 1-855-279-6207 directly.

PRIVACY ACT NOTICE

The Privacy Act of 1974 (5 U.S.C. 552a) requires that the following notice be provided to you: The authorities for collecting the requested information from and about you are §421 et seq., §451 et seq. and §461 et seq. of the Higher Education Act of 1965, as amended (20 U.S.C. 1071 et seq., 20 U.S.C. 1087a et seq., and 20 U.S.C. 1087aa et seq.) and the authorities for collecting and using your Social Security Number (SSN) are §§428B(f) and 484(a)(4) of the HEA (20 U.S.C. 1078-2(f) and 20 U.S.C. 1091(a)(4)) and 31 U.S.C. 7701(b). Participating in the William D. Ford Federal Direct Loan (Direct Loan) Program, the Federal Family Education Loan (FFEL) Program, or the Federal Perkins Loan (Perkins Loan) Program, and giving ED your SSN are voluntary, but you must provide the requested information, including your SSN, to participate. The principal purposes for collecting the information on this form, including your SSN, are to verify your identity, to determine your eligibility to receive a loan or a benefit on a loan (such as a deferment, forbearance, discharge, or forgiveness) under the Direct Loan Program, FFEL, or Perkins Loan Programs, to permit the servicing of your loans, and, if it becomes necessary, to locate you and to collect and report on your loans if your loans become delinquent or default. ED also uses your SSN as an account identifier and to permit you to access your account information electronically. The information in your file may be disclosed, on a case-by-case basis or under a computer matching program, to third parties as authorized under routine uses in the appropriate systems of records notices. The routine uses of this information include, but are not limited to, its disclosure to federal, state, or local agencies, to private parties such as relatives, present and former employers, business and personal associates, to consumer reporting agencies, to financial and educational institutions, and to guaranty agencies in order to verify your identity, to determine your eligibility to receive a loan or a benefit on a loan, to permit the servicing or collection of your

loans, to enforce the terms of the loans, to investigate possible fraud and to verify compliance with federal student financial aid program regulations, or to locate you if you become delinquent in your loan payments or if you default. To provide default rate calculations, disclosures may be made to guaranty agencies, to financial and educational institutions, or to state agencies. To provide financial aid history information, disclosures may be made to educational institutions. To assist program administrators with tracking refunds and cancellations, disclosures may be made to guaranty agencies, to financial and educational institutions, or to federal or state agencies. To provide a standardized method for educational institutions to efficiently submit student enrollment statuses, disclosures may be made to guaranty agencies or to financial and educational institutions. To counsel you in repayment efforts, disclosures may be made to guaranty agencies, to financial and educational institutions, or to federal, state, or local agencies. In the event of litigation, ED may send records to the Department of Justice, a court, adjudicative body, counsel, party, or witness if the disclosure is relevant and necessary to the litigation. If this information, either alone or with other information, indicates a potential violation of law, ED may send it to the appropriate authority for action. ED may send information to members of Congress if you ask them to help you with federal student aid questions. In circumstances involving employment complaints, grievances, or disciplinary actions, ED may disclose relevant records to adjudicate or investigate the issues. If provided for by a collective bargaining agreement, ED may disclose records to a labor organization recognized under 5 U.S.C. Chapter 71. Disclosures may be made to ED contractors for the purpose of performing any programmatic function that requires disclosure of records. Before making any such disclosure, ED will require the contractor to maintain Privacy Act safeguards. Disclosures may also be made to qualified researchers under Privacy Act safeguards.

PAPERWORK REDUCTION ACT NOTICE

According to the Paperwork Reduction Act of 1995, no persons are required to respond to a collection of information unless such collection displays a valid OMB control number. The valid OMB control number for this information collection is 1845-0163. Public reporting burden for this collection of information is estimated to average 3 hours per response, including time for reviewing instructions, searching existing data sources, gathering and maintaining the data needed, and completing and reviewing the collection of information. The obligation to respond to this collection is required to obtain or retain a benefit (20 U.S.C. 1087e(h)). If you have comments or concerns regarding the status of your individual submission of this application, please contact the Borrower Defense customer Contact Center at 1-855-279-6207 directly. You may also submit and manage your application online at StudentAid.gov/borrower-defense.

