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**BEFORE THE DIRECTOR OF THE DEPARTMENT OF FINANCE  
OF THE STATE OF IDAHO**

STATE OF IDAHO, DEPARTMENT OF FINANCE, CONSUMER FINANCE BUREAU,	)	
	)	Docket No. 2011-9-19
Complainant,	)	
	)	<b>CONSENT ORDER</b>
vs.	)	
	)	
DTA SOLUTIONS, LLC, formerly known as FASLO SOLUTIONS, LLC, a Delaware limited liability company,	)	
	)	
Respondent.	)	

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The Director of the State of Idaho, Department of Finance (Director) has conducted a review of the collection activities in Idaho of DTA SOLUTIONS, LLC, formerly known as FASLO SOLUTIONS, LLC (Respondent). Pursuant to said review, it appears to the Director that Respondent has violated provisions of the Idaho Collection Agency Act, Idaho Code § 26-2221 *et seq.* (the Act). The Director and Respondent have agreed to resolve this matter through this Consent Order rather than through a formal administrative or civil action. Therefore, the

Director and Respondent agree to enter into this Consent Order. Respondent voluntarily consents to the entry of this Consent Order.

### **RESPONDENT**

1. Respondent was originally formed as a Delaware limited liability company on June 20, 2007 as "Faslo Solutions, LLC" and later changed its name to "DTA Solutions, LLC" on or about January 14, 2011. Respondent conducts business as a collection agency in Idaho from 8313 Whitley Road, Suite A, Watauga, Texas 76148 and 9428 Baymeadows Road, Suite 260, Jacksonville, Florida 32256. Pinreid LLC is Respondent's parent company and Robert Glenn Hall is Respondent's chief operating officer. Langhorne Reid and Jason Alan Pinson are Respondent's managing-members.

### **FACTS**

2. From July 24, 2007 through October 5, 2010, Faslo Solutions, LLC (Faslo) maintained a Certificate of Authority from the Idaho Secretary of State's Office authorizing it to transact business activities in Idaho and providing information relating to the company's agent for service of process in Idaho.

3. From December 24, 2008 through March 15, 2011, Faslo held Idaho Collection Agency License No. CCA 7493, authorizing it to engage in collection activities in Idaho.

4. On or about December 27, 2010, Faslo sent to the State of Idaho, Department of Finance, Consumer Finance Bureau (Department) a letter notifying the Department that it was changing its company name to "DTA Solutions, LLC." Such letter also informed the Department that the company was relocating its offices. Respondent further requested the Department to advise Respondent if further information was needed, which the Department did via email on January 24, 2011.

5. The Department's January 24, 2011 email notified Respondent that it must file amended application forms along and provide the Department with a bond rider reflecting the changes to formally update the Department's information relating to Faslo. The Department gave Faslo thirty (30) days to provide the requested information. Faslo responded by email notifying the Department of its intent to comply with the Department's instruction.

6. Idaho Code § 26-2224 sets forth the information that needs to be included in an application for a license. Idaho Code § 26-2224(13) provides that "[i]nformation required at the time of application, except for advertisements and solicitations, shall be updated and filed with the director as necessary to keep the information current." Also, Idaho Code § 26-2224(10) requires the applicant to provide the name and business address of the applicant's agent for service of process located in this state.

7. Idaho Code § 26-2231(1) and -(2) provide that a collection agency licensee must file with the Director a license renewal form providing complete information as required by the Director, and pay a fee of \$100 by March 15 of each year, in order for a license to be renewed. Failure to do so results in the automatic expiration of the license as of March 15 of the applicable year. Although Faslo had successfully renewed its license in prior years, it failed to submit a license renewal application by March 15, 2011. Consequently, its license expired by operation of law.

8. On March 25, 2011, the Department sent a letter to Faslo at its address of record with the Department informing Faslo that its Idaho collection agency license had expired effective March 15, 2011 by operation of law, due to Faslo's failure to comply with the renewal requirements of the Act by March 15, 2011. That letter also notified Faslo that it was prohibited

from engaging in collection agency activities in Idaho without holding a license issued under the Act.

9. On June 30, 2011, Respondent submitted to the Department an application for a new Idaho collection agency license.

10. On July 11, 2011, after reviewing Respondent's June 30, 2011 license application, the Department notified Respondent via e-mail that its license application was deficient in several respects. Additionally, the Department's notification requested that Respondent submit information to the Department concerning its collection activities in Idaho after March 15, 2011. The Department gave Respondent until September 9, 2011 to cure the deficiencies contained in its license application, and again warned Respondent that it was not authorized to engage in collection activities in Idaho until such time as it was issued a license under the Act.

11. On or about September 5, 2011, the Department received Respondent's reply to the Department's July 11, 2011 deficiency notice. Such reply included information showing that Respondent had continued collecting against Idaho residents after its Idaho collection agency license had expired due to its failure to renew on March 15, 2011. The Department concluded from the information provided by Respondent that Respondent had engaged in unlicensed collection activities in Idaho against at sixty-seven (67) Idaho residents between March 16, 2011 and at least July 2011, which activities represented at least two hundred thirty-six telephone contacts, and which resulted in Respondent's collection of at least twenty-five hundred dollars (\$2,500). Respondent contends that the errors made were neither willful nor intentional.

**FINDINGS**

*COUNT ONE THROUGH SIXTY-SEVEN: ENGAGING IN UNLICENSED COLLECTION  
ACTIVITIES IN IDAHO*

12. The allegations set forth in paragraphs 1 through 11 above are fully incorporated herein by this reference.

13. Idaho Code § 26-2223 provides as follows, in pertinent part:

**26-2223. Collection agency, debt counselor, credit counselor, or credit repair organization – License required.** – No person shall without complying with the terms of this act and obtaining a license from the director:

(1) Operate as a collection agency . . . in this state.

(2) Engage, either directly or indirectly, in this state in the business of collecting or receiving payment for others of any account, bill, claim or other indebtedness.

...

14. “Collection agency” means a person that engages in any of the activities enumerated in subsections (2) through (6) of Idaho Code § 26-2223. Idaho Code § 26-2223(2) is set forth in paragraph 13 above.

15. Respondent’s acts of engaging in collection activities in Idaho without a license, as referenced above, constitute violations of Idaho Code § 26-2223(1) and –(2), as set forth in paragraph 13 above. Each act of collecting against an Idaho resident constitutes a separate violation.

*COUNT SIXTY-EIGHT: FAILURE TO MAINTAIN UPDATED INFORMATION WITH THE  
DEPARTMENT*

16. The allegations set forth in paragraphs 1 through 11 above are fully incorporated herein by this reference.

17. Idaho Code § 26-2224(10) and (13) requires license holders to provide to the Director the name of the license holder’s agent for service of process, and to update that information with the Director as necessary to the keep the information current.

18. Respondent violated Idaho Code § 26224(10) and (13) by failing to update the Director of the change of Respondent's business name and relocation of its offices.

#### REMEDIES

19. Respondent admits to the violations set forth above, but contends such violations were neither willful nor intentional.

20. Respondent agrees to immediately cease and desist from engaging in any and all collection activities in Idaho, to include making telephone calls related to collection activities, including automated calls; and mailing, faxing, e-mailing, or otherwise delivering communications to Idaho residents in connection with collection activities until such time as it obtains a license under the Act authorizing it to do so.

21. Respondent agrees to pay to the Department the sum of ten thousand dollars (\$10,000) as an administrative penalty in settlement of the violations contained herein, and an additional amount of one thousand dollars (\$1,000) constituting investigative expenses and attorney fees incurred by the Department in pursuing this matter, for a total payment to the Department of eleven thousand dollars (\$11,000), by no later than November 25, 2011.

22. When Respondent has executed this Consent Order and timely paid to the Department the eleven thousand dollar (\$11,000) payment referenced in paragraph 21 above, the Department agrees to accept and consider the license application already submitted by Respondent. Further, the Department agrees that it will not consider this Consent Order as the basis for denial of Respondent's license application.

23. Respondent agrees to comply with all provisions of the Idaho Collection Agency Act, rules promulgated thereunder, and relevant federal law and regulations at all times in the future.

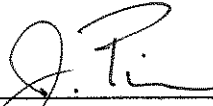
24. The Department agrees not to seek further penalties or fees from Respondent for the violations addressed in this Consent Order, other than as set forth in paragraph 20 above, if Respondent timely and fully complies with all provisions of this Consent Order.

25. Respondent acknowledges and understands that this Consent Order is an administrative action that must be disclosed to the Department on future licensing and renewal forms. The disclosure requirements of other states may also require disclosure of the same.

26. Respondent acknowledges and understands that should the Department learn of additional violations by Respondent of the Act, rules promulgated under the Act, or applicable federal laws and regulations relating to Respondent's collection activities in Idaho, the Department may pursue further legal action and seek additional remedies.

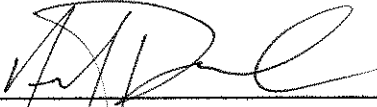
DATED this 21<sup>st</sup> day of November, 2011.

DTA SOLUTIONS, LLC

By:   
Jason A. Pinson  
Title: Managing Member

DATED this 15<sup>th</sup> day of December, 2011.

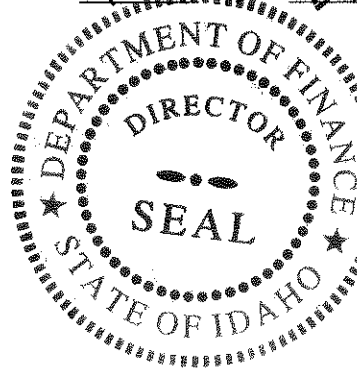
STATE OF IDAHO  
DEPARTMENT OF FINANCE

  
MICHAEL LARSEN  
Consumer Finance Bureau Chief


on behalf of  
M.C.

IT IS SO ORDERED.

DATED this 1<sup>st</sup> day of December, 2011.



STATE OF IDAHO  
DEPARTMENT OF FINANCE

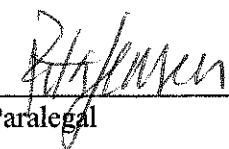
  
GAVIN M. GEE  
Director

**CERTIFICATE OF SERVICE**

I HEREBY CERTIFY that on this 1 day of December, 2011, I served a true and correct copy of the foregoing CONSENT ORDER upon the following by the designated means:

DTA Solutions, LLC  
Attn: Robert Glenn Hall  
8313 Whitley Road, Ste. A  
Watauga, TX 76148

- U.S. mail, postage prepaid
- Certified mail
- Facsimile
- Email

  
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Paralegal