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Attorneys for the Department of Finance

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

In the Matter of:

WESTERN COMPLIANCE RECOVERY GROUP (WCRG),

Respondent.

Docket No. 2025-09-03

ORDER TO CEASE AND DESIST

The Director of the State of Idaho, Department of Finance ("Department"), being authorized to administer and enforce the Idaho Collection Agency Act, Idaho Code §§ 26-2221 et seq. (the "Act"), has determined based on the following Findings of Fact and Conclusions of Law, that it is in the public interest to Order Western Compliance Recovery Group ("Respondent") to immediately **CEASE AND DESIST** from acts, practices, or omissions that violate of the Act.

FINDINGS OF FACT

1. The Department received an online complaint submitted December 5, 2024, from Idaho resident VJ¹, who indicated that she received a collection call and signed an installment agreement with the Respondent on December 3, 2024, regarding a credit card debt allegedly owed

ORDER TO CEASE AND DESIST - Page 1 of 6

¹ The complainant's initials are used herein to protect the privacy of the complainant.

to Household bank.

- 2. VJ reported that she believed the debt had been discharged in her prior bankruptcy, but due to feeling pressured over the phone by Rebecca Rosenberg ("Rosenberg"), she agreed to a settle the debt for \$2,842.92 with a payment plan of \$50.00 a month. Rosenberg had told VJ that if didn't pay, Respondent would file a lawsuit for \$10,463.58 and garnish her washes. Rosenberg also contacted VJ's ex-husband regarding the debt.
- 3. After electronically signing the Resolution Agreement and authorizing payments through Respondent's payment processor ORFI Financial, VJ conducted her own research and found that Respondent was not licensed with the Department to collect debts in Idaho.
- 4. Respondent's address on the Resolution Agreement is 9701 Wilshire Blvd., #1000, Beverly Hills, California. Rosenberg is listed as the Director of Operations and Contract Owner.
- 5. Respondent is not registered with the California Secretary of State nor with the Idaho Secretary of State.
- 6. Respondent has never applied for nor held a license to conduct third-party collection activities in Idaho under the Act.
- 7. Respondent does not hold and have never held a license to collect debts from Idaho residents through the Nationwide Multistate Licensing System (NMLS).
 - 8. No website for the Respondent was located.
- 9. On December 11, 2024, the Department contacted telephone number (888) 672-3116 as listed on Respondent's Resolution Agreement sent to VJ; the phone rang and reached the voicemail box. No response was received from the voicemail attempt.
- 10. On January 7, 2025, the Department sent Respondent a certified letter via USPS regarding requesting all documentation related to collection activities conducted among Idaho

consumers and requiring Respondent to reply by February 3, 2025. USPS tracking information indicated that the delivery was unsuccessful and was eventually returned as "Addressee Unknown."

- 11. On January 16, 2025, VJ informed the Department that Respondent called her and her ex-husband again due to her default on the payment plan. VJ informed the Respondent of the complaint filed with the Department and ended the call.
- 12. On March 14, 2025, a second letter was sent to the email address listed on the installment agreement (westerncompliance@adminwcrg.com). A response was requested by March 28, 2025. However, the email was not successfully delivered, and the return email message from Microsoft Outlook gave the following explanation: "Domain has no MX records or is invalid."
- 13. To date, Respondent has failed to sufficiently respond to the Department's requests, remains unlicensed, and has not filed an application for licensure with the Department.
- 14. Based on information provided to the Department and described above, the Respondent has engaged in unlicensed debt collection activity in Idaho, in violation of the Act.

CONCLUSIONS OF LAW AND VIOLATIONS

UNLICENSED COLLECTION ACTIVITY IN IDAHO

- 15. The allegations set forth in paragraphs 1 through 9 above are fully incorporated herein by this reference.
 - 16. 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, debt counselor, credit counselor, or credit repair organization 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.
- (3) Solicit or advertise in this state to collect or receive payment for another of any account, bill, claim or other indebtedness.
- 17. Respondent's acts of engaging in collection activities in Idaho without a license, as referenced above, constitute violations of Idaho Code § 26-2223. Each contact made by Respondent to the Idaho resident for the purposes of collection constitutes a separate violation.
- 18. Idaho Code § 26-2244(1) provides that whenever it appears to the Director that it is in the public interest, the Director may order any person to cease and desist from acts, practices, or omissions which violate the Act.

ORDER

The Director, having reviewed the foregoing, good cause being shown, and the public interest being served thereby,

NOW, THEREFORE, the Director HEREBY FINDS that Respondent has violated the Idaho Collection Agency Act as set forth above.

Pursuant to Idaho Code § 26-2244(1), IT IS HEREBY ORDERED that Respondent and its agents and employees immediately CEASE AND DESIST from acts, practices, or omissions which constitute a violation of the Act, including specifically from engaging in collection activity in Idaho without the license required by the Act.

This ORDER TO CEASE AND DESIST is effective upon issuance.

IT IS SO ORDERED.

DATED this _____ day of May 2025.



STATE OF IDAHO DEPARTMENT OF FINANCE

PATRICIA R. PERKINS, Director

NOTICE

A hearing will be granted to Respondent if a written request for a hearing is received by the Department within twenty-eight (28) days of the service date of this order.

The written request may be submitted by email to erin.vanengelen@finance.idaho.gov or mailed to the following address:

Attn: Erin Van Engelen Consumer Finance Bureau Chief Idaho Department of Finance P.O. Box 83720 Boise, Idaho 83720-0031

A copy of the request may be copied to the Department's counsel, Amber K. Kauffman, Deputy Attorney General, at amber.kauffman@ag.idaho.gov.

If a hearing is timely requested, the Department will assign the contested case proceeding to the Office of Administrative Hearings pursuant to Idaho Code § 67-5280(2)(a). Proceedings will be conducted in accordance with the Idaho Administrative Procedure Act, Idaho Code §§ 67-5201 *et seq.* and the Idaho Rules of Administrative Procedure (IDAPA 62.01.01).

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on this 1st day of May 2025, I caused a true and correct copy of the foregoing fully executed ORDER TO CEASE AND DESIST to be served on the following by the designated means:

Western Compliance Recovery Group
9701 Wilshire Blvd., Suite #1000
Beverly Hills, CA 90212

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Facsimile

Email:

westerncompliance@adminwcrg.com

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