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

In the Matter of:

ZIONS DEBT HOLDINGS, LLC,

Respondent.

Docket No. 2024-09-01

**ORDER TO CEASE AND
DESIST**

The State of Idaho, Department of Finance staff (Department), pursuant to the Idaho Collection Agency Act, Idaho Code § 26-2221 *et seq.* (the Act), represents the following facts that constitute a basis for the issuance of an order pursuant to § 26-2244(1) of the Act, requiring ZIONS DEBT HOLDINGS, LLC (Respondent) to immediately cease and desist from violating the Act.

RESPONDENT

1. According to its website, <https://www.zionsdebtholdings.com/> , Respondent conducts a third-party collection business. Addresses the Department located for Respondent and the basis for those addresses are as follows:
 - a. An assigned address listed with the Nationwide Multistate Licensing System & Registry (NMLS) is 313 E 1200 S Suite 102, Orem, UT.
 - b. An address found in documentation associated with Respondent and the Utah Department of Commerce: 299 E 950 S, Orem, UT 84059.
 - c. An address listed on Respondent's correspondence with the complainant, with the Better Business Bureau, and on Respondent's website: PO Box 878, Spanish Fork, UT 84660.
2. Respondent has never applied for nor ever been issued any license in Idaho under the Act.
3. The Department reviewed Respondent's website, which represented the following to potential clients:
 - "At Zions Debt Holdings we perfect our techniques of collecting to fit your needs. We understand that collections can be a painful and stressful process. It's our goal to make your experience as simple and stress free as possible; we perfect the manner at

which we collect in order to obtain the highest possible returns for your organization with the fewest possible complaints.”

- “Our mission is to get you paid as quickly & efficiently as possible. Zions Debt Holdings will help you focus on running your business and ease your worries about getting paid. Image is everything! We know that we are an extension of your business and we will do everything to maintain a working relationship with your debtors. It is our mission to optimize returns, face the daily challenges that we enjoy so, and increase our client’s returns through our efforts.”
- “We are committed to recovering your funds. We believe that every debtor has the ability to pay if motivated correctly. We DO NOT alienate the debtors; we attempt to align with them and offer a number of ways to resolve not only your debt but all their debts.”
- “We hope you can find everything you need. Zions Debt Holdings is focused on providing high-quality service and customer satisfaction – we will do everything we can to meet your expectations.”
- “With a variety of offerings to choose from, we’re sure you’ll be happy working with us. Look around our website and if you have any comments or questions, please feel free to contact us.”

4. The Department found many complaints against Respondent by running a search with the Better Business Bureau and Consumer Financial Protection Bureau.

5. The Department conducted research and found that vacant properties were located at the address of 313 E 1200 S Suite, Orem, UT.

ACTIVITY

6. The Department received a consumer complaint from Idaho resident, P.N., dated May 3, 2023.

7. P.N. indicated that she had received mail and a text from Respondent attempting to collect on a debt P.N. believed was invalid and requested that the obligation be removed from her record and any future collection activity cease. P.N. also provided documentation supporting her complaint.

8. Based on its investigation, the Department determined that Respondent was not licensed by the Department to conduct collection business in Idaho.

9. The Department sent a certified letter dated June 1, 2023, via USPS to Respondent at its NMLS registered address regarding P.N.'s complaint. In the letter, the Department notified the Respondent it had received information related to P.N. and that Respondent was engaging in debt collection activity in Idaho without a license. The Department requested all Respondent's documents relating to the assignment of the debt against P.N. The Department also directed Respondent to cease all third-party collection activities in Idaho and to provide information necessary for the Department to determine the extent of Respondent's unlicensed debt collection activities in Idaho. Further, the letter advised Respondent of the license requirement for

engaging in collection activities regulated under the Act in Idaho, and informed Respondent of the possible sanctions under the Act for unlicensed activity. The letter also informed Respondent of the process for obtaining a license. A response was requested on or before June 23, 2023. However, per USPS tracking records, the letter sent to Respondent was unclaimed/being returned to sender on June 27, 2023.

10. The Department sent a second certified letter, dated June 30, 2023, via USPS to Respondent regarding P.N.'s complaint to the address listed with the Utah Secretary of State. This letter included and referenced the June 1, 2023, letter previously sent. The Department required that Respondent respond on or before July 14, 2023. The June 30 letter was deemed undeliverable per USPS tracking records on July 31, 2023.

11. In a letter dated, October 25, 2023, the Department again sent the same request letter noted above to the address with the Utah Secretary of State and another to the address associated with Respondent's website, the correspondence sent to P.N., and the Better Business Bureau.

12. On November 1, 2023, Respondent contacted the Department via email. Respondent indicated P.N.'s account was resolved, and that Respondent had previously responded to the Department regarding P.N.'s account. However, the Department had not previously received any response from Respondent. The Department notified the Respondent via email to provide the

information requested in the Department's original request letters by November 30, 2023.

13. To date, Respondent has failed to sufficiently respond to the Department's correspondence or file an application for licensure with the Department.

14. Based on information provided to the Department and described above, the Respondent has engaged in debt collection activity in Idaho and is not licensed, in violation of the Act.

CONCLUSIONS OF LAW AND VIOLATIONS

UNLICENSED COLLECTION ACTIVITY IN IDAHO

15. The allegations set forth in paragraphs 1 through 12 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, she may order any person to cease and desist from acts, practices, or omissions which constitute a violation of 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 30th day of January 2023.



STATE OF IDAHO
DEPARTMENT OF FINANCE

A handwritten signature in cursive script, appearing to read "Patricia R. Perkins", written over a horizontal line.

PATRICIA R. PERKINS, Director

NOTICE

Respondents are HEREBY NOTIFIED that this ORDER TO CEASE AND DESIST is a final order of the Director.

Respondents may file a motion for reconsideration or request for hearing concerning this final order within twenty-one (21) days of the service date of this order. Any such motion for reconsideration or request for hearing must be in writing, addressed to:

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

A copy of such motion for reconsideration or request for a hearing shall also be served on the Department's counsel, Erick M. Shaner, Deputy Attorney

General, at the same address. Alternatively, the Respondents may email any request for reconsideration or hearing to: CFLegal@finance.idaho.gov.

The Department will dispose of a motion for reconsideration within twenty-one (21) days of the receipt of a motion for reconsideration, or the motion will be considered denied by operation of law. Idaho Code § 67-5246(4); Idaho Rules of Administrative Procedure of the Attorney General (IRAP) at IDAPA 4.11.01.740.02.a.

Should Respondents make a timely request for a hearing, the Director of the Department, or a Hearing Officer acting on the Director's behalf, will notify the Applicant of further steps including the date, time, and place of the hearing. Any hearing and subsequent proceedings in this matter 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 04.11.01).

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on this 30th day of January 2024, 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:

Zions Debt Holdings
Attn: Christopher Carter, Seth Young,
and/or Ayme Mendoza
313 E 1200 S Suite 102
Orem, UT 84058

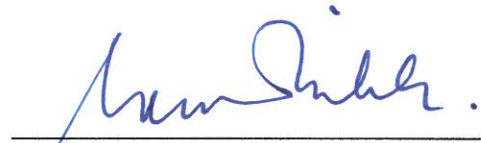
U.S. Mail, Postage Paid
 Certified mail
 Facsimile
 Email:
Chris@mountainrunsolutions.com

Zions Debt Holdings
299 E 950 S
Orem, UT 84059

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 Certified mail
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PO Box 878
Spanish Fork, UT 84660-0878

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 Certified mail
 Facsimile
 Email:
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Paralegal