

RAÚL R. LABRADOR
ATTORNEY GENERAL

JAMES J. SIMERI
Chief of Consumer Protection Division

MATTHEW L. MAURER, ISB No. 12575
Lead Deputy Attorney General
954 W. Jefferson Street, 2nd Floor
Boise, Idaho 83702
Telephone: (208) 332-3556
Facsimile: (208) 334-4151
Email: matthew.maurer@ag.idaho.gov
Attorneys for the Department of Finance

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

In the Matter of:

HILL CITY HOLDINGS LLC

Respondent.

Docket No. 2026-12-01

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 Hill City Holdings LLC (“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 consumer complaint submitted on June 11, 2025 from C.L.¹, an Idaho resident, regarding Respondent’s collection activity against him.

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

Earlier that day, C.L. received an email from Respondent attempting to collect from him and offering a settlement amount on an alleged debt from 2019.

2. Respondent has never applied for nor held a license to conduct third-party collection activities in Idaho under the Act.

3. Respondent does have a profile on the Nationwide Multistate Licensing System (NMLS), but does not hold and has never held a license to collect debts from Idaho residents.

4. Respondent is not and has never been registered with the Idaho Secretary of State.

5. Respondent's website (<https://www.hillcityholdings.com>) landing page includes the following statements purporting to offer collection services:

"Hill City Holdings is a collection agency founded on the experience of industry professionals who value integrity and empathy and use our strong team, analytics, and innovation to produce results. We specialize in collection of consumer accounts."

6. Further on the website landing page, the following information about debt collection is included:

The Debt Collection Process: Steps for Debt Recovery

- *Account is placed for debt collections.*
- *Client sends information on the debt including supporting documentation.*
- *Accounts are reviewed and the data is entered into our debt collection program.*
- *Demand letters are sent to debtor via fax, mail, and/or email and an acknowledgement letter is sent to the Client. Phone contacts begin.*
- *We attempt to arrange payment, resolve any disputes, and obtain clear commitments on debt resolution.*
- *If we obtain payment commitment, we work to ensure the payment(s) materialize.*
- *If a debtor fails to cooperate in resolving the debt, we make final collection attempts.*
- *We send our update and recommendations to the Client, including details on forwarding account to affiliated attorneys.*

7. Respondent's website lists Respondent's address as PO Box 3012, Duluth, Minnesota 55803.

8. Respondent is registered with the Minnesota Secretary of State and has been since April 15, 2024. The registration lists Joseph Shaw as the Registered Agent, with address at 314 W Superior St., Ste 802, Duluth, MN 88502.

9. Respondent held an active collection agency license registered with the Minnesota Department of Commerce from May 28, 2024, until June 30, 2025. The registration address was 314 W Superior St., Ste 802, Duluth, MN 88502.

10. Respondent is registered with the Florida Department of State, but is currently inactive. The registration indicated Registered Agents, Inc. as the Registered Agent, with address at 7901 4th St. N, Ste 300, St. Petersburg, FL, 33702.

11. The Department sent Respondent duplicate certified letters dated June 16, 2025, regarding unlicensed collection activity reported by Idaho consumer C.L. The letters were addressed to 314 W Superior St., Ste 802, Duluth, MN 88502 and PO Box 3012, Duluth MN 55803. The letters were returned to sender because they were “*Unclaimed.*”

12. On July 09, 2025, duplicate letters were sent again via certified mail to 314 W Superior St., Ste 802, Duluth, MN 88502 and PO Box 3012, Duluth MN 55803. The certified letter sent to 314 W Superior St. Ste. 802 Duluth, MN 55802, was, “*Delivered, Left with Individual on July 31, 2025.*” It reflected being signed by John with the last name being not legible. The certified letter sent to PO Box 3012, Duluth MN 55803 was again returned to sender as it was deemed as “*Unclaimed.*”

13. On August 25, 2025, the Department sent emails to three email addresses found on the Respondent’s website, consumer letter, and NMLS profile: information@hillcityholdings.com, info@hillcityholdings.com and Joseph.Shaw@hillcityholdings.com.

14. The emails included attachments of CL's complaint, CL's collection letters, and all four certified letters that had been sent to the Respondent previously, as well as delivery receipt and read receipt requests.

15. The Department received an automated reply that stated "*Delivery to these recipients or group is complete, but no delivery notification was sent by the destination server: information@hillcityholdings.com, info@hillcityholdings.com, Joseph.Shaw@hillcityholdings.com."* There were no read receipts from any of the three email addresses.

16. 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.

17. 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

18. The allegations set forth in paragraphs 1 through 18 above are fully incorporated herein by this reference.

19. 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 or 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.

20. Respondent's acts of engaging in collection activity 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.

21. Idaho Code § 26-2244(1) provides that whenever it appears 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.

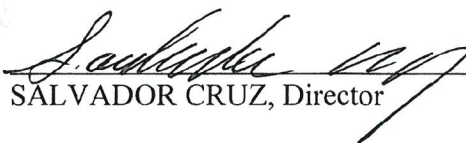
This ORDER TO CEASE AND DESIST is effective upon issuance.

IT IS SO ORDERED.

DATED this 17 day of February 2026.



STATE OF IDAHO
DEPARTMENT OF FINANCE


SALVADOR CRUZ, Director

NOTICE

Respondent may appeal from this order within twenty-eight (28) days of the service date of this order. Idaho Code §§ 26-2249 and 67-5273 An appeal is filed when it is received by the Department or postmarked within the time limits provided in this Notice. Any such appeal must be in writing and sent **via mail** or **via email** to:

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

ErinVanEngelen@finance.Idaho.gov

An appeal may also be served on the Department's counsel, Matthew Maurer, Lead Deputy Attorney General, at matthew.maurer@ag.idaho.gov.

If the Applicant timely appeals this action, the Department will assign the contested case proceeding to the Office of Administrative Hearings pursuant to Idaho Code § 67-5280(2)(a).

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 62.01.01).

CERTIFICATE OF SERVICE

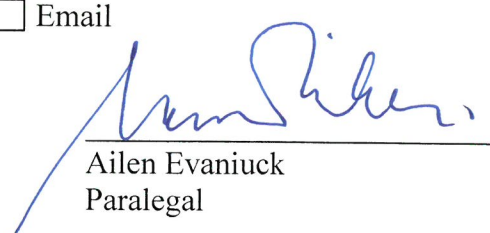
I HEREBY CERTIFY that on this 17th day of February 2026, I caused a true and correct copy of the foregoing fully executed ORDER TO CEASE AND DESIST to be served on the following by the designated means:

Hill City Holdings LLC
314 W Superior St., Ste. 802
Duluth, MN 55803

- U.S. Mail, Postage Paid
- Certified mail
- Facsimile
- Email: information@hillcityholdings.com;
info@hillcityholdings.com;
Joseph.Shaw@hillcityholdings.com

Hill City Holdings LLC
P.O. Box 3012
Duluth, MN 55803

- U.S. Mail, Postage Paid
- Certified mail
- Facsimile
- Email



Ailen Evaniuck
Paralegal