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

In re:

AVENGE SOLUTIONS, LLC DBA AVENGE
CREDIT REPAIR
Collection Agency License No. CCR-10407,
NMLS ID 1931242

Licensee.

Docket No. 2021-9-08

**VERIFIED COMPLAINT FOR REVOCATION
OF IDAHO COLLECTION AGENCY ACT
LICENSE**

AND

**NOTICE OF THE OPPORTUNITY TO
REQUEST A HEARING**

Comes now the staff of the Idaho Department of Finance (Department), by and through its undersigned counsel and hereby alleges and complains as follows and provides this Verified Complaint for Revocation of Idaho Collection Agency Act License and Notice of the Opportunity to Request a Hearing (Notice).

Pursuant to Idaho Code § 26-2227, AVENGE SOLUTIONS, LLC DBA AVENGE CREDIT REPAIR has the right to a hearing on the question of whether its license should be revoked, but to do so

it must make a written request for a hearing within twenty-one (21) days after the date of mailing of this Notice.

VERIFIED COMPLAINT

MATTERS ASSERTED

1. The Director of the Department of Finance has jurisdiction over this matter.
2. AVENGE SOLUTIONS, LLC DBA AVENGE CREDIT REPAIR (the Licensee) is an Idaho limited liability company and conducting business 3916 S. Morning Glow Place, Meridian, Idaho 83719. The Licensee has been registered to conduct business in Idaho with the Idaho Secretary of State since at least August 2019.
3. The Licensee is licensed by the Idaho Department of Finance (Department) under the Idaho Collection Agency Act and has been since approximately March 6, 2020, holding NMLS No. 1931242 and License No. CCR-10407 pursuant to the Idaho Collection Agency Act, Idaho Code § 26-2221 *et seq.* (the Act).
4. Pursuant to Idaho code § 26-2232, licensees shall maintain a surety bond in the minimum amount of \$15,000 or higher based on the volume of business conducted in Idaho. On September 29, 2021, the Department received notice from the surety bond company for the Licensee that the Licensee's surety bond would be cancelled effective October 30, 2021.
5. The Department issued two notices on September 30 and October 21, 2021, utilizing the Nationwide Multistate Licensing System (NMLS), informing the Licensee of its need to replace its bond or surrender its license no later than October 30, 2021.

6. On September 29, 2021, and effective October 30, 2021, the Department received notice via the NMLS that the Licensee's bond would be cancelled as of the effective date. To date, the Licensee has failed to replace its bond as required or surrender its license.

COUNT 1.

The allegations set forth in paragraphs 1 through 6 above are fully incorporated herein by this reference.

7. Idaho Code § 26-2232(3) requires that, "The amount of the bond upon renewal shall be in the amount of fifteen thousand dollars (\$15,000), or two (2) times the average monthly [net collections over the preceding year] computed to the next highest one thousand dollars (\$1,000), whichever sum is greater" Idaho Code § 26-2232(1) requires that the bond, "shall be for the term of the license issued to the applicant." Idaho Code § 26-2232(2) provides in part: "The bond shall be continuous in form and shall remain in full force and effect for the license period."

8. Idaho Code § 26-2227(1) provides "[a]n application for license may be denied or, after notice and the opportunity for a hearing, a license may be suspended or revoked by the director if he finds that facts or conditions exist which would have justified the director in refusing to grant a license had such facts or conditions been known to exist at the time the license was issued, or that the licensee (a) [h]as violated any provision of this act...."

9. The Licensee's failure to comply with Idaho Code § 26-2232 by virtue of the October 30th bond cancellation demonstrates a violation of the required bond by the Licensee.

10. Based on these facts, the Department alleges that it is appropriate to revoke the Licensee's license pursuant to Idaho Code § 26-2227.

PRAYER FOR RELIEF

11. The Department requests and prays for the entry of an order by the Director:
- a. Revoking the Licensee's license as a collection agency,
 - b. Requiring the Licensee to transfer all of its Idaho business to a licensee duly licensed under the Act in Idaho within thirty (30) days from the entry of the order if it has not already done so consistent with Idaho Code § 26-2246,
 - c. Requiring the Licensee to provide notice within twenty-eight (28) days of the date of the order to all current clients, if any, of the revocation of its license and of the transfer of all its Idaho business to a licensee duly licensed in Idaho, and to deliver a copy of that notice to the Director contemporaneously with the delivery to its current clients,
 - d. Requiring the Licensee to provide to the Director written evidence of the transfer of all Idaho business within forty-two (42) days of the date of the entry of the order, and
 - e. Imposing such further and additional relief as the Director deems appropriate.

NOTICE OF DUTY TO ANSWER AND NOTICE OF RIGHT TO HEARING

12. Pursuant to Idaho Code § 26-2227(1), Idaho Code § 67-5254, and IDAPA 04.11.01.270.01 a hearing will be granted to the Licensee if a written Answer and a Request for Hearing is received by the Department, within twenty-one (21) days following the mailing of this

Notice, the date of which is set forth in the below Certificate of Mailing. The Answer and Request for Hearing must be mailed to the following address:

Attn: Lisa Baker
Assistant to the Director
Idaho Department of Finance
P.O. Box 83720
Boise, Idaho 83720-0031

A copy of such Answer and Request for Hearing shall also be served on the Department's counsel:

Thomas A. Donovan
Deputy Attorney General
Idaho Department of Finance
P.O. Box 83720
Boise, Idaho 83720-0031

Alternatively, the Answer and Request for Hearing may be served upon counsel for the Department electronically at the email address set forth on the top of page one.

13. Upon receipt of the Answer and Request for Hearing, the Director will likely appoint a Hearing Officer. The Hearing Officer shall set the time and place for the hearing and the procedures for the hearing shall be in compliance with the Idaho Administrative Procedures Act (title 67, chapter 52, Idaho Code) and the Idaho Rules of Administrative Procedure (IDAPA 04.11.01).

14. Failure of the Licensee to file and serve an Answer and Request for Hearing within the time prescribed shall be deemed a waiver of the opportunity for a hearing and to contest the allegations in the Complaint, and the Department will seek to have the Director enter a default order granting the relief sought in this Notice revoking Licensee's collection agency license.

DATED this 1st day of December 2021.

STATE OF IDAHO
OFFICE OF ATTORNEY GENERAL



THOMAS A. DONOVAN
Deputy Attorney General

VERIFICATION

STATE OF IDAHO)
) ss.
County of Ada)

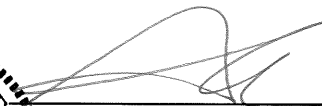
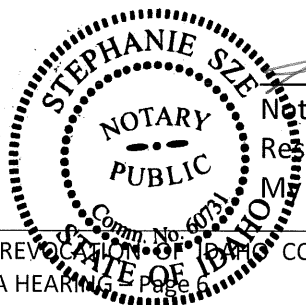
ERIN VAN ENGELEN, Consumer Finance Bureau Chief of the Department of Finance,
State of Idaho, being first duly sworn, deposes and says:

I have read the foregoing Verified Complaint for Revocation of Idaho Collection Agency
License and Notice of the Opportunity to Request a Hearing and know the contents thereof;
and that the same are true to the best of my knowledge and belief.

DATED this 12th day of December 2021.


ERIN VAN ENGELEN

SUBSCRIBED AND SWORN to before me this 1st day of December 2021.


Notary Public for Idaho
Residing at: Meridian, ID
My Commission Expires: 11/30/2024

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on this 13th day of December 2021, I caused a true and correct copy of the foregoing VERIFIED COMPLAINT FOR REVOCATION OF IDAHO COLLECTION AGENCY ACT LICENSE AND NOTICE OF THE OPPORTUNITY TO REQUEST A HEARING to be served on the following by the designated means:

Avenge Solutions, LLC dba Avenge Credit Repair [X] U.S. Mail, postage prepaid
Attn: Jeff Cristler [X] Certified mail
PO Box 190281 [] Facsimile:
Boise, ID 83713 [X] Email: jeff@avengecreditrepair.com

Registered Agents, Inc. [X] U.S. Mail, postage prepaid
784 S Clearwater Loop Ste R [X] Certified mail
Post Falls, ID 83854 [] Facsimile:
[X] Email: agent@idahoregisteredagent.com

Avenge Solutions, LLC dba Avenge Credit Repair [X] U.S. Mail, postage prepaid
Attn: Jeff Cristler [X] Certified mail
3916 S. Morning Glow Pl [] Facsimile:
Meridian, Idaho 83719 [] Email:

Paralegal