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

In re:

HEALTHCARE REVENUE RECOVERY  
GROUP, LLC  
Collection Agency License No. CCA-5497,

Licensee.

Docket No. 2019-9-04

**VERIFIED COMPLAINT FOR REVOCATION  
OF IDAHO COLLECTION AGENCY 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 hereby provides this Verified Complaint for Revocation of Idaho Collection Agency License and Notice of the Opportunity to Request a Hearing (Notice).

Pursuant to Idaho Code § 26-2227, HEALTHCARE REVENUE RECOVERY GROUP, LLC (the Licensee) 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. The Licensee is a limited liability company domiciled in the state of Florida, conducting business from 1643 North Harrison Parkway, Building H, Suite 100, Sunrise, Florida. The Licensee has been registered as a Foreign Limited Liability Company with the Idaho Secretary of State since April 2005.
3. The Licensee is licensed by the Idaho Department of Finance (Department) as a collection agency and has been since approximately April 14, 2006, holding License No. CCA-5497 pursuant to the Idaho Collection Agency Act, Idaho Code § 26-2221 *et seq.* (the Act).
4. Pursuant to Idaho code § 26-2232, all licensees shall maintain a surety bond in the minimum amount of \$15,000 or higher amount based on the volume of business conducted in Idaho. The Licensee filed its 2019 Collection Agency Licensee Surety Bond Calculation form dated March 8, 2019, which was received by the Department on the same date. The Licensee calculated its bond amount to be \$31,000 based on the Idaho payments it collected during 2018. The Licensee failed to increase its bond amount to \$31,000.
5. The Department issued two notices on March 12 and April 23, 2019, utilizing the Nationwide Multistate Licensing System (NMLS) to inform the Licensee of its need to increase its total bond amount from \$15,000 to \$31,000 effective March 15, 2019.
6. To date, the Licensee has failed to increase its bond amount as required.

7. Since March 15, 2019, the date of the license renewal per Idaho Code § 26-2231, the Licensee has failed to maintain a sufficient surety bond.

COUNT 1

The allegations set forth in paragraphs 1 through 7 above are fully incorporated herein by this reference.

8. 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 of the preceding year computed to the next highest one thousand dollars (\$1,000), whichever sum is greater ....”

9. 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...”

10. The Licensee’s failure to comply with Idaho Code § 26-2232(3) demonstrates a violation of the required bond amount by the Licensee.

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

PRAYER FOR RELIEF

12. 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 collection agency duly licensed in Idaho within thirty (35) days from the entry of the order,
- 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 collection agency license and of the transfer of all its Idaho business to a collection agency 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**

13. 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:

Anthony Polidori  
Consumer Finance Bureau Chief  
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:

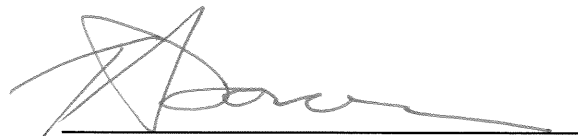
Thomas A. Donovan  
Deputy Attorney General  
Idaho Department of Finance  
P.O. Box 83720  
Boise, Idaho 83720-0031

14. Upon receipt of the Answer and Request for Hearing, the Director will 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).

15. 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 Verified 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 12<sup>th</sup> day of June, 2019.

STATE OF IDAHO  
OFFICE OF ATTORNEY GENERAL



THOMAS A. DONOVAN  
Deputy Attorney General

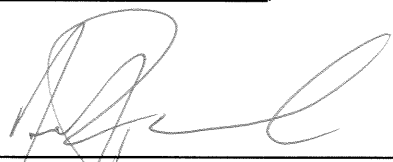
VERIFICATION

STATE OF IDAHO     )  
                                  ) ss.  
County of Ada        )


ANTHONY POLIDORI, Consumer Finance Bureau Chief of the Department of Finance,  
State of Idaho, being first duly sworn, deposes and says:

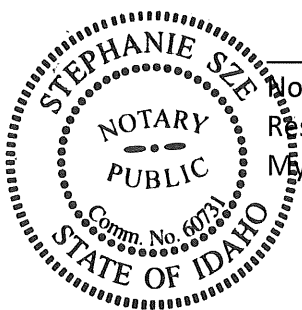
I have read the foregoing Verified Complaint for Revocation of Idaho Collection Agency  
License and Notice of the Opportunity to Request a Hearing, and know the contents thereof;  
and that the same are true to the best of my knowledge and belief.

DATED this 12 day of June, 2019.

  
\_\_\_\_\_  
ANTHONY POLIDORI

SUBSCRIBED AND SWORN to before me this 12<sup>th</sup> day of June, 2019.

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



**CERTIFICATE OF SERVICE**

I HEREBY CERTIFY that on this 12<sup>th</sup> day of June, 2019, I caused a true and correct copy of the foregoing VERIFIED COMPLAINT FOR REVOCATION OF IDAHO COLLECTION AGENCY LICENSE AND NOTICE OF THE OPPORTUNITY TO REQUEST A HEARING to be served on the following by the designated means:

Healthcare Revenue Recovery Group, LLC  
Attn: David Friedlander  
1643 N Harrison Parkway  
Building H, Ste. 100  
Sunrise, FL 33323

U.S. Mail, postage prepaid  
 Certified mail  
 Facsimile:  
 Email: david.friedlander@teamhealth.com

Corporation Service Company  
Registered Agent  
12550 W Explorer Dr., Ste. 100  
Boise, ID 83713

U.S. Mail, postage prepaid  
 Certified mail  
 Facsimile:  
 Email:

