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

In Re:

PIONEER LAW FIRM, P.C.

Docket No. 2020-9-05

**CONSENT ORDER**

This matter concerns the activities in Idaho of PIONEER LAW FIRM, P.C. (Pioneer) as they related to the State of Idaho, Department of Finance through its Consumer Finance Bureau (Department), collectively the Parties. In support of entry of this Consent Order and to fully resolve the matters referenced herein, the Department and Pioneer agree and consent to the following, and to entry of same by the Director in this Consent Order. This Consent Order is entered into pursuant to the Idaho Collection Agency Act, Idaho Code § 26-2221 *et seq.* (the Act).

1. The Idaho Department of Finance is an executive agency of the State of Idaho and is charged with the administration of the Act.

2. Pioneer is a Colorado professional corporation formerly known as John B. Dougherty P.C. that represents it is engaged in the practice of law and conducts business from an address at 390 Interlocken Crescent, Suite 350, Broomfield, CO 80021. Pioneer represents that an Idaho-licensed attorney is an equity interest owner of Pioneer.

3. Pioneer has never held an Idaho collection agency license.

4. On February 27, 2020, the Department received a complaint letter from an Idaho resident, Janet Shepherd, who represented that she had engaged Pioneer to assist her with resolving outstanding debts via Finance Solutions.

5. On March 5 and April 7, 2020, the Department sent letters to Pioneer regarding its activity in Idaho and seeking additional facts including the extent of other Idahoans who have utilized Pioneer's services. The letter advised Pioneer of the Department's position that a license is required of Pioneer pursuant to the Act in Idaho, specifically Idaho Code § 26-2223(7). On May 7, 2020, the Department sent a letter to the Idaho-licensed attorney regarding the attorney's relationship with Pioneer.

6. Pioneer (and the Idaho-licensed attorney) responded through counsel on June 8, 2020, by maintaining that it is not subject to licensure pursuant to the Act, and further that it is exempt pursuant to the exemption for licensed attorneys. Thus Pioneer represents that it is subject to the exclusive oversight and jurisdiction of the Idaho Supreme Court.

7. Pioneer denies that it is subject to licensure under the Act.

8. Pioneer represents that it has eight (8) other Idaho clients in addition to the complaining party, and represents that all eight (8) clients have paid all of their fees due to Pioneer under their respective agreements, and further that all fees are earned such that no refund amounts are due them. Pioneer will continue to provide services to its existing clients without charging additional fees.

9. Pioneer shall not accept or enroll any new Idaho clients without first obtaining a license from the Department under the Act. Nothing herein shall prevent any Idaho-licensed attorneys from accepting new Idaho clients separate and apart from Pioneer.

10. Pioneer agrees to issue a full refund of fees to Ms. Shepherd, which shall consist of all fees that have not already been partially refunded to her or paid to her creditors, totaling twelve thousand seven hundred thirty-five dollars and 45/100s (\$12,735.45). The refund payment will be conditioned on Ms. Shepherd signing a release. Pioneer agrees to pay to the Department the sum of four thousand dollars (\$4,000) as a settlement payment. Nothing in this Agreement shall be construed as an admission of wrongdoing or any liability by Pioneer.

11. The fee refund, presuming a signed release has been received, and settlement payment referenced above, which refund the Department will provide to Ms. Shepherd directly, will be made by Pioneer to the Department no later than September 25, 2020.

12. The Department will not take any action against Pioneer or its attorneys or agents based on the facts giving rise to this matter and known as of the date of the Consent Order provided Pioneer remains in compliance with the terms and provisions of this Consent Order.

The Department is not precluded from taking action against Pioneer in the future based upon any new facts should they become known or new complaints should they occur.

13. The parties shall bear their own costs and attorney fees.

14. The Parties knowingly and voluntarily agree to the contents of and to the entry of this Consent Order to resolve the issues raised herein and to obviate the need for any further proceedings, and the Department and Respondent further waive their rights to a hearing before the Director, to present evidence, and to seek any further review of the entry of this final Consent Order. By her signature below, the Director deems it appropriate and based on good cause to enter the Consent Order.

15. The parties understand and agree that if and when the Director adopts the terms of this Consent Order by affixing her signature, this Consent Order will become a final order, and the parties further agree to waive all rights to seek reconsideration or judicial review of this Consent Order.

DATED this 21st day of SEPTEMBER, 2020.

Pioneer Law Firm, PC

By: \_\_\_\_\_

MANAGER

\_\_\_\_\_  
Title

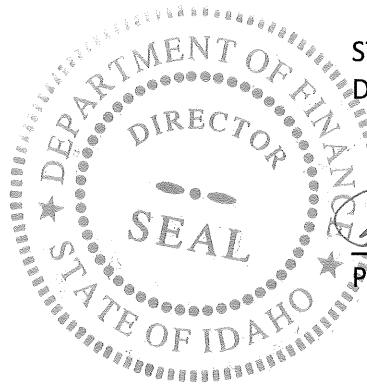
DATED this 28 day of September, 2020.

STATE OF IDAHO  
DEPARTMENT OF FINANCE

  
\_\_\_\_\_  
ERIN VAN ENGELEN  
Consumer Services Bureau Chief

**IT IS SO ORDERED.**

DATED and EFFECTIVE this 29<sup>th</sup> day of September, 2020.



STATE OF IDAHO  
DEPARTMENT OF FINANCE

  
\_\_\_\_\_  
PATRICIA R. PERKINS, Director

**CERTIFICATE OF SERVICE**

I HEREBY CERTIFY that on this 30<sup>th</sup> day of September, 2020, I caused a true and correct copy of the foregoing fully-executed CONSENT ORDER to be served on the following counsel for the parties by the designated means:

Timothy D. Elliott  
Rathje Woodward LLC  
300 East Roosevelt Rd., Ste. 300  
Wheaton, IL 60187

U.S. mail, postage prepaid  
 Certified mail  
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