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

STATE OF IDAHO, DEPARTMENT OF)
FINANCE, CONSUMER FINANCE)
BUREAU,)
Complainant,)
vs.)
SEATTLE SERVICE BUREAU, INC., dba)
NATIONAL SERVICE BUREAU, a)
Washington corporation,)
Respondent.)

Docket No. 2011-9-01

CONSENT ORDER

The Director of the State of Idaho, Department of Finance (Director) has conducted a review of the collection activities in Idaho of SEATTLE SERVICE BUREAU, INC., dba NATIONAL SERVICE BUREAU (the Respondent). Pursuant to such review, it appears to the Director that the Respondent has violated provisions of the Idaho Collection Agency Act, Idaho Code § 26-2221 *et seq.* (the Act). The Director and the Respondent have agreed to resolve this matter through this Consent Order rather than through a formal administrative proceeding or civil action. Therefore, the Director deems it appropriate and in the public interest that this

Consent Order be entered. The Respondent voluntarily consents to the entry of this Consent Order.

RESPONDENT

1. The Respondent was formed as a Washington corporation on December 30, 1987. The Respondent conducts business as a collection agency in Idaho from 18820 Aurora Avenue North, Suite 205, Shoreline, Washington 98133. The Respondent's CEO/Owner is David Brian Conyers.

FACTS

2. From August 26, 2005 through January 5, 2009, the Respondent held Idaho Foreign Permittee Collection Agency Permit No. CFP-4857, authorizing it to engage in collection activities in Idaho.

3. On July 1, 2008, amendments to the Act became effective in Idaho law. Such amendments included the elimination of collection agency "foreign permits" and the requirement that collection agencies that formerly held a "foreign permit" transition to a "license" under the Act if they wished to continue engaging in collection activities in Idaho. Pursuant to such amendments to the Act, failure to transition from a "permit" to a "license" would result in termination of a permit.

4. On May 12, 2008, the State of Idaho, Department of Finance, Consumer Finance Bureau (Department) sent letters to foreign permittees affected by the changes to the Act, to include the Respondent, informing them of the necessary steps to transition from a permit to a license, and of other requirements necessary to remain licensed under the Act. The letter also informed foreign permittees that their permits would terminate if they failed to meet the new requirements of the Act by July 1, 2008.

5. The Respondent failed to meet the new requirements of the Act by July 1, 2008, so its authority to engage in collection activities in Idaho was terminated as of that date.

6. On May 27, 2010, the Department received a complaint from an Idaho resident indicating that the Respondent was engaging in collection activities in Idaho. Such complaint led to communication between the Department and the Respondent concerning whether the Respondent was engaging in unlicensed collection activities in Idaho, and the requirement that engaging in such activities necessitates maintaining a license under the Act or being subject to sanctions for failure to do so.

7. On October 4, 2010, the Respondent submitted to the Department an application for an Idaho collection agency license.

8. On October 8, 2010, the Department notified the Respondent via e-mail of deficiencies in its license application. In such e-mail, the Department also requested that the Respondent submit information to the Department concerning its collection activities in Idaho from January 6, 2009 to the date of such request.

9. On November 22, 2010, the Respondent satisfied the deficiencies in its license application, and provided the information requested by the Department concerning its collection activities in Idaho from January 6, 2009 forward. Such information showed that during that time period, the Respondent had engaged in collection activities in Idaho with regard to at least eight (8) Idaho residents, while it failed to hold a collection agency license under the Act.

FINDINGS

ENGAGING IN UNLICENSED COLLECTION ACTIVITIES IN IDAHO

10. The allegations set forth in paragraphs 1 through 9 above are fully incorporated herein by this reference.

11. 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 . . . 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.

...

12. “Collection agency” means a person who engages in any of the activities enumerated in subsections (2) through (6) of Idaho Code § 26-2223, which are enumerated in the previous paragraph, in pertinent part.

13. The Respondent’s acts of engaging in collection activities in Idaho without a license, as referenced in paragraph 9 above, constitute violations of Idaho Code § 26-2223(1) and –(2), as set forth in paragraph 11 above.

REMEDIES

14. The Respondent admits to violations of Idaho Code § 26-2223(1) and –(2) by operating as a collection agency in Idaho and collecting or receiving payments for others of any account, bill, claim or other indebtedness, while not licensed under the Act, as referenced in paragraph 9 above.

15. The Respondent agrees to immediately cease and desist from engaging in any and all collection activities in Idaho, to include making telephone calls related to collection activities, including automated calls; and mailing, faxing, e-mailing, or otherwise delivering communications to Idaho residents in connection with collection activities until such time as it obtains a license under the Act authorizing it to do so.

16. The Respondent agrees to pay to the Department the sum of one thousand dollars (\$1,000) as an administrative penalty in settlement of the violations contained herein, and an

additional amount of one thousand dollars (\$1,000) constituting investigative expenses and attorney fees incurred by the Department in pursuing this matter, for a total payment to the Department of two thousand dollars (\$2,000), by no later than February 7, 2011.

17. When the Respondent has executed this Consent Order and timely paid to the Department the two thousand dollars (\$2,000) payment referenced in paragraph 16 above, the Department agrees to accept and consider the license application already submitted by the Respondent, and that it will not use this Consent Order as the basis for denial of the Respondent's license application.

18. The Respondent agrees to comply with all provisions of the Idaho Collection Agency Act, rules promulgated thereunder, and relevant federal law and regulations at all times in the future.

19. The Department agrees not to seek further penalties or fees from the Respondent for the violations addressed in this Consent Order, other than as set forth in paragraph 16 above, if the Respondent timely and fully complies with all provisions of this Consent Order.

20. The Respondent acknowledges and understands that this Consent Order is an administrative action that must be disclosed to the Department on future licensing and renewal forms. The disclosure requirements of other states may also require disclosure of the same.

21. The Respondent acknowledges and understands that should the Department learn of additional violations by the Respondent of the Act, rules promulgated under the Act, or applicable federal laws and regulations relating to the Respondent's collection activities in Idaho, the Department may pursue further legal action and seek additional remedies.

DATED this 26 day of JANUARY, 2011.

SEATTLE SERVICE BUREAU, INC., dba
NATIONAL SERVICE BUREAU

By: [Signature]

Title: CEO

DATED this 4th day of FEBRUARY, 2011.

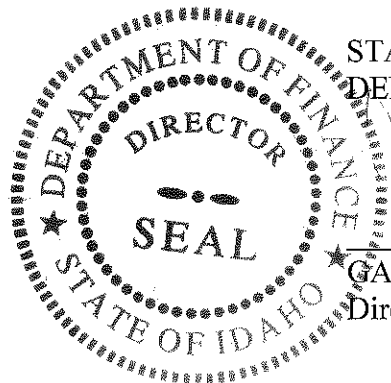
STATE OF IDAHO
DEPARTMENT OF FINANCE

[Signature]

MICHAEL LARSEN
Consumer Finance Bureau Chief

IT IS SO ORDERED.

DATED this 4th day of FEBRUARY, 2011.



STATE OF IDAHO
DEPARTMENT OF FINANCE

[Signature]

GAVIN M. GEE
Director

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on this 4 day of February, 2011, I served a true and correct copy of the foregoing CONSENT ORDER upon the following by the designated means:

Seattle Service Bureau, Inc., dba
National Service Bureau
Attn: David Conyers, CEO/Owner
PO Box 55789
Seattle, WA 98155

- U.S. mail, postage prepaid
- Certified mail
- Facsimile: (206) 542-8994
- Email: _____



Paralegal