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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,)

Docket No. 2009-9-09

Complainant,)

ORDER TO CEASE AND DESIST

vs.)

YOUR CREDIT ANGEL LLC, a division)
of CORONWA INVESTMENTS, LLC, a)
Nevada limited liability company,)

Respondent.)

The State of Idaho, Department of Finance (Department), pursuant to the Idaho Collection Agency Act, Idaho Code § 26-2221 *et seq.* (the Act), hereby alleges the following facts that constitute a basis for the issuance of an order pursuant to § 26-2244(1) of the Act and § 67-5247 of the Idaho Administrative Procedure Act, Idaho Code § 67-5201 *et seq.*, requiring YOUR CREDIT ANGEL LLC, purportedly a division of CORONWA INVESTMENTS, LLC to immediately cease and desist from violating the Act, to include engaging in unlicensed debt or credit counseling activity in Idaho.

RESPONDENT

1. CORONWA INVESTMENTS, LLC was formed on January 22, 2008 as a Nevada limited liability company. The company lists its business address with the Nevada Secretary of State's Office as 848 N. Rainbow Blvd., Suite 1908, Las Vegas, NV 89107. This address is a mail drop box and not an office where business is transacted. The Nevada Secretary of State's Office lists Jim Nelson as CORONWA INVESTMENTS, LLC's manager, and Ron Swenson as its registered agent. CORONWA INVESTMENTS, LLC represents in certain documents it has provided to customers or prospective customers that YOUR CREDIT ANGEL LLC is a division of CORONWA INVESTMENTS, LLC. YOUR CREDIT ANGEL LLC is not registered as a limited liability company with the Secretary of State's Offices of the states of Idaho, Nevada, or Washington. Collectively herein, both purported limited liability companies are referred to as "the Respondent."

2. The Respondent uses the website <http://your-credit-angel.com/>, wherein it represents that its services include assisting homeowners who have fallen behind in their mortgage payments, by renegotiating mortgage loans or negotiating agreements with mortgage lenders "to sell [their] home for less than the full amount owed." It refers to its services as a "Loan Modification Program." The Respondent also represents itself as "the largest Short Sale company in the USA."

3. The Department has never issued to the Respondent any license under the Act, including specifically a license to engage in residential mortgage loan modification or related services in Idaho, which activity falls within the definition of debt or credit counseling under the Act.

FACTUAL ALLEGATIONS

4. In or around December 2008, Idaho resident D.H. read an advertisement by the Respondent on Craigslist.com referencing its residential mortgage loan modification services, which services included assisting debtors in modifying or attempting to modify their mortgage debt for a fee. D.H. called the telephone number listed in the advertisement and spoke with a woman who identified herself Tonya M., a representative of the Respondent. D.H. also communicated with Tonya M. via e-mail.

5. After communicating with the Respondent's representative, D.H. became interested in the Respondent's loan modification program. The Respondent's representative told D.H. that to begin the program he must send two checks made out to the Respondent by which the Respondent could electronically obtain funds from D.H.'s bank account to cover the Respondent's fee for its services, which totaled \$1,495.00. D.H. complied with the instructions and sent the two checks to the Respondent.

6. The Respondent subsequently e-mailed documents to D.H. that were purportedly necessary for delivery of the Respondent's services, requesting that D.H. complete and return the forms. After his review of the Respondent's forms, D.H. decided he did not wish to participate in the Respondent's loan modification program. He informed the Respondent that he did not wish to use its services, and requested a refund of his money. D.H. then learned that the Respondent had already withdrawn \$750 from D.H.'s bank account, so he placed a stop payment order with his bank as to the second check.

7. Despite the request by D.H. that the Respondent refund his money, the Respondent circumvented the stop payment order on the second check by reprocessing D.H.'s first check, and thereby obtained another \$745 from D.H.'s bank account, constituting receipt of

the full payment it had sought from D.H. for its mortgage loan modification and related services. D.H. was required to pay fees to his bank resulting from the electronic check transactions with the Respondent. Once the Respondent had been paid in full by D.H., it offered to assist in a short sale of D.H.'s home, but D.H. was interested in a mortgage modification, not a short sale. D.H. has received no benefit from his dealings with the Respondent concerning his mortgage loan debt, yet has paid the Respondent's full fee of \$1,495.00, which the Respondent has refused to refund.

8. On or about January 7, 2009, D.H. filed a complaint with the Consumer Protection Division of the Idaho Attorney General's Office (Consumer Protection Division) concerning his dealings with the Respondent. On February 4, 2009, the Consumer Protection Division sent a letter to the Respondent addressed to 848 N. Rainbow Blvd., P.O. Box 7414, Las Vegas, NV 89107, seeking information from the Respondent concerning its business dealings with D.H. As stated in paragraph 1 above, that address is a mail drop box. The 848 N. Rainbow Blvd., Las Vegas, NV 89107 mail drop box address is the address listed on several of the documents e-mailed by the Respondent to D.H., and is also the address listed with the Nevada Secretary of State's Office. The letter sent to that address was returned to the Consumer Protection Division as undeliverable.

CONCLUSIONS OF LAW AND VIOLATIONS

UNLICENSED DEBT OR CREDIT COUNSELING IN IDAHO

9. The allegations set forth in paragraphs 1 through 8 above are fully incorporated herein by this reference.

10. Idaho Code § 26-2223(1) provides as follows, in pertinent part:

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.

...

11. Idaho Code § 26-2222(9) defines “debt counselor” or “credit counselor” as any person engaged in any of the activities set forth in Idaho Code § 26-2223(7).

12. The activities described in § 26-2223(7) include the following:

. . . engag[ing] or offer[ing] to engage in this state in the business of providing counseling or other services to debtors in the management of their debts, or contracting with the debtor to effect the adjustment, compromise, or discharge of any account, note or other indebtedness of the debtor.

13. The activities described in § 26-2223(7), as set forth in paragraph 12 above, encompass the mortgage loan modification and related services engaged in by the Respondent, and which services were offered to, and paid for by, Idaho resident D.H.

14. The Respondent’s acts of engaging in or offering to engage in mortgage loan modification and related activities in Idaho, which acts constitute debt counseling or credit counseling under the Act, as described in paragraph 12 above, while the Respondent failed to hold a license under the Act, are violations of Idaho Code § 26-2223(1).

DIRECTOR’S AUTHORITY

15. Idaho Code § 26-2244(1) provides that whenever it appears to the Director that it is in the public interest, he may order any person to cease and desist from acts, practices, or omissions which constitute a violation of the Act.

16. Idaho Code § 67-5247(3) authorizes the Director to issue an order that is effective when issued, should he find that an immediate danger to the public health, safety, or welfare to of Idaho residents requires immediate action.

ORDER

The Director, having reviewed the foregoing, good cause being shown, the public interest being served thereby, and the Respondent's violations of the Act requiring immediate action to protect Idaho residents,

NOW, THEREFORE, the Director HEREBY FINDS that the Respondent has violated the Idaho Collection Agency Act as set forth above.

Pursuant to Idaho Code §§ 26-2244(1) and 67-5247, IT IS HEREBY ORDERED that the Respondent and its agents and employees immediately CEASE AND DESIST from any further debt or credit counseling activities in Idaho, to include residential mortgage loan modification and related activities; from any other conduct under the Act for which a license from the Director is required; and from any other violations of the Act.

This ORDER is EFFECTIVE UPON ISSUANCE.

IT IS SO ORDERED.

DATED this 17th day of April, 2009.



STATE OF IDAHO
DEPARTMENT OF FINANCE


GAVIN M. GEE, Director

NOTICE

The Respondent is HEREBY NOTIFIED that this ORDER TO CEASE AND DESIST is a final order of the Director.

The Respondent may file a motion for reconsideration or request for hearing concerning this final order within fourteen (14) days of the service date of this order. Any such motion for reconsideration or request for hearing must be in writing, addressed to:

Michael Larsen
Consumer Finance Bureau Chief
Idaho Department of Finance
P.O. Box 83720
Boise, Idaho 83720-0031

A copy of the motion for reconsideration or request for a hearing shall also be served on the Department's counsel in this matter, A. René Martin, Deputy Attorney General, at the following address:

A. René Martin
Deputy Attorney General - Lead
Idaho Department of Finance
P.O. Box 83720
Boise, Idaho 83720-0031

The Department will dispose of a motion for reconsideration within twenty-one (21) days of the receipt of a motion for reconsideration, or the motion will be considered denied by operation of law. Idaho Code § 67-5246(4); Idaho Rules of Administrative Procedure of the Attorney General (IRAP) at IDAPA 4.11.01.740.02.a. Should the Respondent make a timely request for a hearing, the Department shall schedule a hearing within the twenty-one (21) day time period.

Pursuant to Idaho Code §§ 67-5270 and 67-5272, any party aggrieved by this final order may appeal to the district court by filing a petition in the district court of the county in which:

- i. A hearing was held;
- ii. The final agency action was taken;
- iii. The party seeking review of the order resides, or operates its principal place of business in Idaho; or
- iv. The real property or personal property that was the subject of the agency action is located.

See IDAPA 04.11.01.740.02.b.

An appeal must be filed within twenty-eight (28) days of (a) the service date of this final order, (b) of an order denying a motion for reconsideration, or (c) the failure within twenty-one (21) days to grant or deny a motion for reconsideration or schedule a hearing, whichever is later. See Idaho Code § 67-5273. The filing of an appeal to the district court does not itself stay the effectiveness or enforcement of the order under appeal. See IDAPA 04.11.01.740.02.c.

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on this 7 day of April, 2009, I served a true and correct copy of the foregoing ORDER TO CEASE AND DESIST upon the following by the designated means:

Your Credit Angel LLC,
a division of Coronwa Investments, LLC
848 N. Rainbow Blvd., Suite 1908
Las Vegas, NV 89107

- U.S. mail, postage prepaid
- Certified mail
- Facsimile
- Electronic Mail

Your Credit Angel LLC,
a division of Coronwa Investments, LLC
PO Box 7414
Las Vegas, NV 89107

- U.S. mail, postage prepaid
- Certified mail
- Facsimile
- Electronic Mail

Your Credit Angel LLC,
a division of Coronwa Investments, LLC
ceo@your-credit-angel.com

- U.S. mail, postage prepaid
- Certified mail
- Facsimile
- Electronic Mail

Your Credit Angel LLC,
a division of Coronwa Investments, LLC
admin@your-credit-angel.com

- U.S. mail, postage prepaid
- Certified mail
- Facsimile
- Electronic Mail



Paralegal