



3300 W. Sahara, Suite 250
Las Vegas, Nevada 89102
(702) 486-4120

STATE OF NEVADA
DEPARTMENT OF BUSINESS AND INDUSTRY
FINANCIAL INSTITUTIONS DIVISION

1755 East Plumb Lane, Suite 243
Reno, Nevada 89502
(775) 688-1730

IN THE MATTER OF:

Bryant, Inc.
dba: Nevada Professional Collections
Services, Inc.

and

Larry D. Bryant,

Respondents.

ADMINISTRATIVE COMPLAINT FOR
DISCIPLINARY ACTION AND APPEAL
RIGHTS

ADMINISTRATIVE COMPLAINT FOR DISCIPLINARY ACTION

MARY YOUNG, Acting Deputy Commissioner of the NEVADA FINANCIAL INSTITUTIONS DIVISION of the DEPARTMENT OF BUSINESS AND INDUSTRY, STATE OF NEVADA (the "Division"), complains for disciplinary action against Bryant, Inc., dba: Nevada Professional Collections Services, Inc., (hereinafter "NPCS") and Larry D. Bryant (hereinafter, "Bryant"), (collectively, "Respondents"), as follows:

JURISDICTION

1. The business of collecting claims for others or of soliciting the right to collect or receive payment for another of any claim in the State of Nevada is governed by NRS Chapter 649 and NAC Chapter 649.

2. The Division has primary jurisdiction for the licensing and regulation of persons operating and/or engaging in collection services. NRS 649.020; NRS 649.045; NRS 649.051 *et seq.*; NRS 649.075 *et seq.*

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3 **DISCIPLINE AUTHORIZED**

4 **CONCLUSIONS OF LAW**

5 **13.** NRS 649.075(1) reads as follows:

6 1. Except as otherwise provided in this section, a person shall
7 not conduct within this State a collection agency or engage within
8 this State in the business of collecting claims for others, or of
9 soliciting the right to collect or receive payment for another of any
10 claim, or advertise, or solicit, either in print, by letter, in person or
11 otherwise, the right to collect or receive payment for another of any
12 claim, or seek to make collection or obtain payment of any claim
13 on behalf of another without having first applied for and obtained a
14 license from the Commissioner.

15 **14.** NRS 649.390 provides the Commissioner to take disciplinary action for any
16 violation of NRS Chapter 649.

17 NRS 649.390 Investigation of verified complaint concerning
18 unlicensed person; order to cease and desist; administrative fines;
19 suit to recover fine; cumulative penalties.

20 1. The Commissioner shall conduct an investigation if he
21 receives a verified complaint from any person that sets forth
22 reason to believe that an unlicensed person is engaging in an
23 activity for which a license is required pursuant to this chapter.

24 2. If the Commissioner determines that an unlicensed person is
25 engaging in an activity for which a license is required pursuant to
26 this chapter, the Commissioner shall issue and serve on the
27 person an order to cease and desist from engaging in the activity
28 until such time as the person obtains a license from the
Commissioner.

3. If a person upon whom an order to cease and desist is served
does not comply with the order within 30 days after service, the
Commissioner shall, after notice and opportunity for a hearing:

(a) Impose upon the person an administrative fine of \$10,000; or

(b) Enter into a written consent agreement with the person
pursuant to which the person agrees to cease and desist from all
unlicensed activity in this State relating to the collection of debts,
and impose upon the person an administrative fine of not less than
\$5,000 and not more than \$10,000.

-- The imposition of an administrative fine pursuant to this
subsection is a final decision for the purposes of judicial review.

4. The Commissioner shall bring suit in the name and on behalf
of the State of Nevada against a person upon whom an

1 administrative fine is imposed pursuant to subsection 3 to recover
the amount of the administrative fine:

2 (a) If no petition for judicial review is filed pursuant to NRS
233B.130 and the fine remains unpaid for more than 90 days after
3 notice of the imposition of the fine; or

4 (b) If a petition for judicial review is filed pursuant to NRS
233B.130 and the fine remains unpaid for more than 90 days after
5 exhaustion of any right of appeal in the courts of this State
6 resulting in a final determination that upholds the imposition of the
fine.

7 5. A person's liability for an administrative fine is in addition to
8 any other penalty provided in this chapter.

9 **15.** Pursuant to NRS 649.440, the Commissioner can impose administrative fines
10 of not more than \$10,000.00 for any violation of this chapter.

11 In addition to any other remedy or penalty, the Commissioner
12 may impose an administrative fine of not more than \$10,000 upon
13 a person who:

14 1. Without a license or certificate, conducts any business or
15 activity for which a license or certificate is required pursuant to the
16 provisions of this chapter; or

17 2. Violates any provision of this chapter or any regulation
18 adopted pursuant thereto.

19 **16.** Respondents have violated NRS 649.075 by engaging in the business of a
20 collection agency in the State of Nevada without having maintained proper licensing from
21 the Division.

22 **17.** Pursuant to NRS 649.390, the Division hereby orders Respondent to cease
23 and desist all activity covered under NRS Chapter 649.
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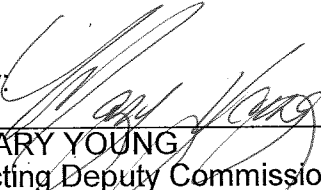
RELIEF SOUGHT

18. Based upon the allegations contained herein which constitute sufficient cause for disciplinary action against the licensee pursuant to the provisions of NRS Chapter 649 and NAC Chapter 649, the Commissioner prays for relief as follows:

- A. Respondent be fined a monetary sum pursuant to the parameters defined at NRS 649.390;
- B. That action be taken against Bryant's manager license pursuant to the parameters defined at NRS 649.215;
- C. That Respondent be ordered to desist and refrain from any and all violations of NRS Chapter 649 and NAC Chapter 649;
- D. For such other and further relief as the Administrative Law Judge may deem just and proper.

DATED this 10th day of August 2017.

STATE OF NEVADA
DEPARTMENT OF BUSINESS AND INDUSTRY
FINANCIAL INSTITUTIONS DIVISION

By: 

MARY YOUNG
Acting Deputy Commissioner

RESPONSE

THEREFORE, Respondent is directed to answer in writing the Administrative Complaint for Disciplinary Action within thirty (30) calendar days from service and to serve the same upon the undersigned Deputy Attorney General.

APPEAL RIGHTS

RESPONDENT HAS THE RIGHT TO REQUEST A HEARING IN THIS MATTER. If you wish to request a hearing you must file a request **within thirty (30) days** after this Administrative Complaint was served on the Respondent.

Your request for a hearing must be delivered to:

STATE OF NEVADA
DEPARTMENT OF BUSINESS AND INDUSTRY
FINANCIAL INSTITUTIONS DIVISION
3300 W. Sahara, Suite 250
LAS VEGAS, NEVADA 89102

Other important rights you have are listed in Nevada Revised Statutes Chapters 649 and 233B and the Nevada Administrative Code Chapter 649.

DATED this 21st day of August, 2017.

STATE OF NEVADA
DEPARTMENT OF BUSINESS
AND INDUSTRY
FINANCIAL INSTITUTIONS DIVISION

By:



MARY YOUNG
Acting Deputy Commissioner

CERTIFICATE OF SERVICE

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I certify that I am an employee of the State of Nevada, Office of the Attorney General, and that on this 9th day of August 2017, I deposited in the U.S. mail, postage prepaid, via First Class Mail and Certified Return Receipt Requested, a true and correct copy of the foregoing **ADMINISTRATIVE COMPLAINT FOR DISCIPLINARY ACTION AND NOTICE OF HEARING**, addressed as follows:

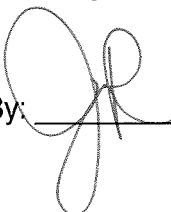
Bryant, Inc.
dba Nevada Professional Collections Services, Inc.
Attention: Larry D. Bryant
122 North Holderrieth Blvd, #77
Tomball, Texas 77375

Certified Mail: 7014 2870 0001 8495 1256

Bryant, Inc.
dba Nevada Professional Collections Services, Inc.
Attention: Larry D. Bryant
P.O. Box 77
Tomball, Texas 77377

Certified Mail: 7014 2870 0001 8495 1263

DATED this 9th day of August 2017.

By:  _____