



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

**STATE OF NEVADA
DEPARTMENT OF BUSINESS AND INDUSTRY
FINANCIAL INSTITUTIONS DIVISION**

1830 E College Parkway, Suite 100
Carson City, Nevada 89706
(775) 684-2970

In Re:

PlusFour Inc.

Respondent.

**ORDER TO CEASE AND DESIST
FROM VIOLATIONS OF NRS 649;
NOTICE OF RIGHT TO A HEARING**

**ORDER TO CEASE AND DESIST FROM
VIOLATIONS OF NRS 649**

The State of Nevada, Department of Business and Industry, Financial Institutions Division (hereinafter "Division" or "NFID") hereby orders PlusFour Inc. (hereafter "Respondent") to cease and desist from any and all activities that are in violation of Chapter 649 of the Nevada Revised Statutes ("NRS") and of the Nevada Administrative Code ("NAC").

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 Nevada Revised Statutes (NRS) Chapter 649 and Nevada Administrative Code (NAC) Chapter 649.

2. The Commissioner 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.

3. Pursuant to the authority vested by NRS 649, the Commissioner hereby makes the following Findings of Fact and Conclusions of Law.

1 **FINDINGS OF FACT**

2 4. Respondent is registered under the laws of the State of Nevada, and its resident
3 agent is VC2 Law, located at 8985 S. Eastern Ave, Ste 100, Las Vegas, NV 89123.

4 5. Respondent operates the business of a collection agency at the following
5 location: 2600 Paseo Verde Pkwy, Ste 101, Henderson, NV 89074.

6 6. Licensee obtained its collection agency license on or about July 11, 1984.

7 7. The Division has completed six examinations in the last three years, all of which
8 received less than satisfactory ratings.

9 8. Licensee failed to submit verified responses to consumer complaints within the
10 statutory timeframes.

11 9. Licensee failed to submit its Annual Report to the Commissioner within the
12 statutory timeframes. As of November 7, 2024, the Annual Report that was due to the
13 Commissioner on April 15, 2024, had not yet been received.

14 10. Licensee failed to submit complete examination documentation to the Division
15 within the established deadlines, in some cases, the documentation was never submitted.

16 11. Licensee failed to submit responses to its examinations within the established
17 timeframes.

18 12. If any Finding of Fact is more properly characterized as a Conclusion of Law, it
19 shall be considered as such.

20 **CONCLUSIONS OF LAW**

21 Based on the Findings of Fact, the Commissioner finds as follows:

22 13. NRS 649.395 states the grounds for suspension or revocation for a collection
23 agency license,

24 14. NRS 649.395 (1) states:

25 The Commissioner may impose an administrative fine, not to exceed \$500 for each
26 violation, or suspend or revoke the license of a collection agency, or both impose a fine
27 and suspend or revoke the license, by an order made in writing and filed in the Office of
28 the Commissioner and served on the licensee by registered or certified mail at the
address shown in the records of the Commissioner, if:

(a) The licensee is adjudged liable in any court of law for breach of any bond
given under the provisions of this chapter; or

(b) After notice and hearing, the licensee is found guilty of:

- (1) Fraud or misrepresentation;
- (2) An act or omission inconsistent with the faithful discharge of the licensee's duties and obligations; or
- (3) A violation of any provision of this chapter.

15. The licensee violated the provisions of NRS 649.300 by failing to fully cooperate with the examination performed by NFID. The licensee failed to provide NFID adequate documentation to allow them to conduct the examination required by NRS 649.056. Examiners were unable to verify compliance with record keeping requirements, trust account balances and activity, form letters and client payments;

16. The licensee failed to rectify, or failed to verify that they rectified, a violation for negative trust balances pursuant to NRS 649.355.

17. The licensee failed to provide sufficient documentation for examiners to verify compliance with record keeping requirements, in violation of NRS 649.335.

18. The licensee failed to provide sufficient documentation for examiners to verify compliance with remote collection agents, in violation of NRS 649.310.

19. The licensee, in violation of NRS 649.366, NRS 649.367 and Approved Regulation R055-21 Sec. 4.1, was found to be using letters that did not comply with the requirements for medical debt communication.

20. The licensee, in violation of NRS 649.345, failed to submit its Annual Report to the Commissioner by the required due date. The report is still outstanding.

21. The licensee, in violation of NRS 649.385 and NAC 649.310, failed to file a verified answer to a complaint within the required timeframes.

22. In consideration of all the criteria pursuant to NRS 649.056, NRS 649.300, NRS 649.310, NRS 649.335, NRS 649.345, NRS 649.355, NRS 649.385, NRS 649.395, NAC 649.081, NAC 649.310 and Approved Regulation R055-21 Sec 4.1, the Division has grounds for the suspension or revocation of the Licensee's collection agency license.

23. If any Conclusion of Law is more properly characterized as a Finding of Fact, it shall be considered as such.

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Respondent shall also comply with any additional disciplinary measures the Administrative Law Judge may deem necessary, should the matter proceed to a hearing.

STATE OF NEVADA
DEPARTMENT OF BUSINESS AND INDUSTRY
FINANCIAL INSTITUTIONS DIVISION

Sandy O'Laughlin
Commissioner

1 **APPEAL RIGHTS**

2 **RESPONDENT HAS THE RIGHT TO REQUEST A HEARING IN THIS MATTER.** If
3 you wish to request a hearing, you must file a request **within twenty (20) calendar days** after
4 this Order to Cease and Desist was served on the Respondent.

5 Respondent's request for a hearing must be delivered to:

6 FINANCIAL INSTITUTIONS DIVISION
7 DEPARTMENT OF BUSINESS AND INDUSTRY
8 3300 W. Sahara Avenue, Suite 250
9 Las Vegas, Nevada 89102

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

12 DATED this 8th day of November 2024.

13 STATE OF NEVADA
14 DEPARTMENT OF BUSINESS AND INDUSTRY
15 FINANCIAL INSTITUTIONS DIVISION

16 By: 

17 Sandy O'Laughlin
18 Commissioner
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1 **CERTIFICATE OF SERVICE**

2 I certify that I am an employee of the State of Nevada, Department of Business and
3 Industry, Financial Institutions Division, and that on November 8, 2024, I deposited in the
4 U.S. mail, postage prepaid, via First Class Mail and Certified Return Receipt Requested, a
5 true and correct copy of the foregoing **ORDER TO CEASE AND DESIST FROM**
6 **VIOLATIONS OF NRS CHAPTER 669; NOTICE OF RIGHT TO APPEAL**, addressed as
7 follows:

8 Mitch Guthrie
9 Vice President of Operations
10 PlusFour Inc
11 2600 Paseo Verde Parkway, Suite 100
12 Henderson, NV 89074
13 *Certified Mail: 7014 2870 0001 8499 1184*

14 Tricia Guthrie
15 Chief Compliance Officer
16 PlusFour Inc
17 2600 Paseo Verde Parkway, Suite 100
18 Henderson, NV 89074
19 *Certified Mail: 7014 2870 0001 8499 1191*

20 Richard Bennett
21 President
22 PlusFour Inc
23 2600 Paseo Verde Parkway, Suite 100
24 Henderson, NV 89074
25 *Certified Mail: 7014 2870 0001 8499 1207*

26 Plus Four Inc
27 c/o VC2 Law
28 8985 S. Eastern Ave, Suite 100
Las Vegas, NV 89123
Certified Mail: 7014 2870 0001 8499 1214

29 DATED this 8 day of November 2024.

30 By: 