



STATE OF NEVADA
DEPARTMENT OF BUSINESS AND INDUSTRY
FINANCIAL INSTITUTIONS DIVISION

2785 E. Desert Inn Road, Suite 180
Las Vegas, Nevada 89121
(702) 486-4120

1179 Fairview Drive, Ste 201
Carson City, Nevada 89701
(775) 687-5522

In Re:

FULL SPECTRUM LITIGATION COMPANY;
d.b.a. www.fullspectrumlitigation.com,

Respondent.

**ORDER TO CEASE AND DESIST
UNLICENSED ACTIVITIES AND
NOTICE OF RIGHT TO APPEAL**

The State of Nevada Department of Business and Industry, Financial Institutions Division (hereinafter "Division") hereby orders FULL LITIGATION COMPANY; d.b.a. www.fullspectrumlitigation.com, (hereinafter "Respondent") to cease and desist from any and all activities which are covered under Nevada Revised Statutes (NRS) Chapter 649.

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 chapter 649 of the Nevada Revised Statutes (NRS) and chapter 649 of the Nevada Administrative Code (NAC). The Division has primary jurisdiction for the licensing and regulation of persons operating and/or engaging in collection services. NRS 649.026.

2. Pursuant to the authority vested by NRS Chapter 649, the Division hereby makes the following Findings of Fact, Conclusions of Law, and Order.

FINDINGS OF FACT

3. Respondent FULL SPECTRUM LITIGATION COMPANY; d.b.a. www.fullspectrumlitigation.com, is not a business registered with the State of Nevada Secretary of State.

1 4. Respondent's business address is located in the State of California at 9668
2 Milliken Avenue, #104250, Rancho Cucamonga, California 91730. The address is for a
3 mailbox inside a UPS Store and is not an actual office.

4 5. No registration was found with the Secretary of State for California as a
5 corporation or limited liability company.

6 6. Respondent solicits collection business through their website address
7 www.fullspectrumlitigation.com. On its website, Respondent states that it is engaged in the
8 business of a collection agency as follows:

9 Here at Full Spectrum Litigation Company, we strive to stay one
10 step ahead of the collection industry standards. Committing
11 resources, and combining a talented staff of multi-lingual
12 professionals, with experience in all aspects of commercial and
13 consumer debt collection are critical components to our mission.

14 7. Respondent is not now and has never been licensed as a collection agency by
15 the Division.

16 8. Respondent engaged in the business as a collection agency in the State of
17 Nevada without first obtaining a license to do so.

18 9. The Division has received a complaint from a resident of the State of Nevada
19 that Respondent had attempted to collect a claim against the resident.

20 10. On October 19, 2012, Respondent sent a letter to a Nevada resident stating that
21 it had been "retained" by a creditor, Cashnet USA, to collect an outstanding balance of
22 \$650.87. However, Respondent stated, "Full Spectrum Litigation Company agrees to accept
23 in full the sum of \$300.00 if received in our office no later than October 23, 2012."

24 11. The letter concludes, "This is an attempt to collect a debt, any information
25 obtained can be used for that purpose."

26 12. Respondent's actions are a willful and intentional violation of the laws of the
27 State of Nevada.
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1 13. If any finding of fact is more properly characterized as a conclusion of law, it
2 shall be considered as such.

3 CONCLUSIONS OF LAW

4 14. NRS 649.075(1) reads as follows:

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

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

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

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

23 2. If the Commissioner determines that an unlicensed person is
24 engaging in an activity for which a license is required pursuant to
25 this chapter, the Commissioner shall issue and serve on the
26 person an order to cease and desist from engaging in the activity
27 until such time as the person obtains a license from the
28 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 administrative fine is imposed pursuant to subsection 3 to recover the amount of the administrative fine:

- (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 notice of the imposition of the fine; or

1 (b) If a petition for judicial review is filed pursuant to NRS
2 233B.130 and the fine remains unpaid for more than 90 days after
3 exhaustion of any right of appeal in the courts of this State
4 resulting in a final determination that upholds the imposition of the
5 fine.

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

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

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

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

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

18 17. Respondent has violated NRS 649.075 by engaging in the business of a
19 collection agency in the State of Nevada without a license to do so.

20 18. Pursuant to NRS 649.390, the Division hereby orders Respondent to cease and
21 desist all activity covered under NRS Chapter 649.

22 19. Any conclusion of law which is more properly characterized as a finding of fact
23 shall be considered as such.

24 ORDER

25 IT IS HEREBY ORDERED that Respondent FULL SPECTRUM LITIGATION
26 COMPANY; d.b.a. www.fullspectrumlitigation.com, shall **CEASE AND DESIST** from operating
27 and/or engaging in the business of "collecting claims for others, or of soliciting the right to
28 collect or receive payment for another of any claim, or advertise, or solicit, either in print, by

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letter, in person or otherwise, the right to collect or receive payment for another of any claim, or seek to make collection or obtain payment of any claim on behalf of another" within the State of Nevada unless and until such time Respondent becomes licensed by the Division pursuant to NRS Chapter 649.

DATED this 1st day of March 2013.

STATE OF NEVADA
DEPARTMENT OF BUSINESS AND INDUSTRY
FINANCIAL INSTITUTIONS DIVISION

By: *Carla Kulebuck*
CARLA C. KOLEBUCK,
Deputy 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 thirty (30) days** after this Order
4 to Cease and Desist was served on the Respondent.

5 Your request for a hearing must be delivered to:

6 FINANCIAL INSTITUTIONS DIVISION
7 STATE OF NEVADA, DEPARTMENT OF BUSINESS
8 AND INDUSTRY
9 2785 E. Desert Inn Road, Suite 180
10 Las Vegas, Nevada 89121

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

13 DATED this 15th day of March 2013.

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

17 By: _____

18 *Carla Colebuck*
19 CARLA C. KOLEBUCK,
20 Deputy Commissioner
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CERTIFICATE OF SERVICE

I certify that I am an employee of the State of Nevada, Department of Business and Industry, Financial Institutions Division, and that on 4th day of March, 2013, 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 **ORDER TO CEAD DESIST UNLICENSED ACTIVITIES AND NOTICE OF RIGHT TO APPEAL**, addressed as follows:

Full Spectrum Litigation Co.
d.b.a. www.fullspectrumlitigation.com
9668 Milliken Ave., #104250
Rancho Cucamonga, CA 91730

By: Chantane Chaney

Certified Mail: 7012 1640 0000 6162 5535

7012 1640 0000 6162 5535

U.S. Postal Service	
CERTIFIED MAIL™ RECEIPT <i>OC 3/13</i>	
<i>(Domestic Mail Only; No Insurance Coverage Provided)</i>	
For delivery information visit our website at www.usps.com	
OFFICIAL USE	
Postage	\$
Certified Fee	
Return Receipt Fee (Endorsement Required)	
Restricted Delivery Fee (Endorsement Required)	
Total Postage & Fees	\$
Sent To	Full Spectrum Litigation Co.
Street, Apt. No., or PO Box No.	9668 Milliken Ave., #104250
City, State, ZIP+	Rancho Cucamonga, CA 91730
PS Form 3800	