

1 6. Respondent failed to submit its Annual Report to the Commissioner within the statutory
2 timeframes. As of November 7, 2024, the Annual Report that was due to the Commissioner on April 15,
3 2024, had not yet been received.

4 7. Respondent failed to submit complete examination documentation to the Division within
5 the established deadlines, in some cases, the documentation was never submitted.

6 8. Respondent failed to submit responses to its examinations within the established
7 timeframes.

8 9. As a result of the examinations and their findings, the Division issued the Order on
9 November 8, 2024.

10 10. On November 26, 2024, Respondent responded to the Order by requesting a hearing.

11 11. This matter was subsequently referred to an Administrative Law Judge (ALJ) for hearing.

12 12. Based on the findings of the examinations, subsequent developments during the course of
13 these proceedings, and in order to avoid further administrative action, the parties have agreed to resolve
14 this matter.

15 13. The Consent Order shall memorialize revocation of Respondent's collection agency
16 license and the action Respondent shall take, and refrain from, thereafter.

17 14. Any fact stated herein that is more properly characterized as a conclusion of law shall be
18 considered as such.

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CONCLUSIONS OF LAW AS STATED IN ORDER

15. NRS 649.395 states the grounds for revocation of a collection agency license:

16. NRS 649.395(1) states:

The Commissioner may impose an administrative fine, not to exceed \$500 for each violation, or suspend or revoke the license of a collection agency, or both impose a fine and suspend or revoke the license, by an order made in writing and filed in the Office of 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.

17. Respondent 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.

18. Respondent failed to rectify or failed to verify that they rectified, a violation for negative trust balances pursuant to NRS 649.355.

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

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

21. Respondent, 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.

22. Respondent, 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.

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

24. 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 revocation of Respondent's collection agency license.

CONSENT ORDER

25. Pursuant to NRS 233B.121(5), the Division and Respondent agree to informal disposition of this contested case by consent order under the terms and conditions set forth herein and thereby waive the requirement for findings of fact and conclusions of law in this matter.

26. Respondent does not admit but does not contest the facts and violations of law as alleged and stated in the Order.

27. Respondent's collection agency license shall be revoked pursuant to NRS 649.395, with the revocation becoming effective thirty days from the date of this order (**Revocation Date**).

28. Respondent therefore agrees:

- a. Respondent shall immediately cease all outgoing communications, except as specified in this order, and shall not accept any new clients starting immediately upon entry of this order.
- b. From the date of the entry of this order, Respondent shall retain records consistent with NRS 649.335.
- c. By the Revocation Date, the Respondent shall provide to the Division the location where the books and records will be maintained pursuant to this paragraph and the contact information for the individual whom the Division may contact to obtain Respondent's books and records.
- d. From the Revocation Date, Respondent shall forever cease and desist from engaging in any collection activity in Nevada.
- e. Within fourteen days of the Revocation Date, Respondent shall:

- i. provide notice of the revocation of its collection agency license to all of its clients, via email, attaching a copy of this order to the notice (**Revocation Notices**) and using a method of service that generates proof of delivery for each client, and
 - ii. return all client accounts.
- f. Within thirty days of the Revocation Date, Respondent shall provide to the Division:
 - i. a full and complete list of all Respondent's clients as of the Revocation Date; contact information for each client, including but not limited to the client's mailing address, a telephone number or email address, and the name of any point of contact; and the total amount owed to each client,
 - ii. copies of all Revocation Notices (sent electronically), and
 - iii. proof of delivery (i.e., electronic) for each client.
- g. Within sixty days of the Revocation Date, Respondent shall disburse all funds owed to its clients.
- h. Within ninety days of the Revocation Date, Respondent shall provide to the Division a report identifying:
 - i. all clients to whom disbursements have been made,
 - ii. the payment details for each client to which disbursements were made,
 - iii. all clients to whom disbursements were not made or remain outstanding,
 - iv. the total amount owed to each client, and
 - v. Respondent's intention with regard to any amounts owed and not yet disbursed.

29. The Division reserves the right to require that Respondent serve additional notice(s) on any clients to which amounts remain owed or disbursement remain outstanding.

30. The Division agrees not to proceed with the revocation hearing in this matter. The Division also agrees not to pursue any other or greater remedies or fines in connection with Respondent's uncontested conduct referenced herein, except as provided under NRS 649.115. The Division reserves its right to pursue any remedy allowed by law as set forth in paragraph 37 of this consent order.

1 31. Respondent and the Division agree that by entering into this consent order, the Division
2 does not concede any defense or mitigation Respondent asserted or may have asserted in this matter.

3 32. Respondent agrees and understands that by entering into this consent order, Respondent
4 is waiving its right to a hearing at which Respondent may present evidence in its defense, its right to a
5 written decision on the merits of the Order, its right to reconsideration, rehearing, appeal, or judicial
6 review, and all other rights which may be afforded by the Nevada Administrative Procedure Act, the
7 Collection Agency statutes and accompanying regulations, and the federal and state constitutions.

8 33. Respondent understands this consent order will be posted on the Division's website in
9 ordinary course and may be subject to public records laws.

10 34. Respondent fully understands that it has the right to be represented by legal counsel in this
11 matter at its own expense, and having retained legal counsel in this matter, agrees that Respondent shall
12 bear its own attorney's fees and costs.

13 35. In consideration of execution of this consent order, the Respondent and Bennett in his
14 personal capacity, and its/his successors, heirs, and assigns, and the like, hereby releases, remises, and
15 forever discharges the State of Nevada, the Department of Business and Industry, and the Division, and
16 each of their respective members, agents, employees and counsel in their individual and representative
17 capacities, from any and all manner of actions, causes of action, suits, debts, judgments, executions,
18 claims, and demands whatsoever, known and unknown, in law or equity, that the Respondent ever had,
19 now has, may have, or claim to have, against any or all of the persons or entities named in this section,
20 arising out of or by reason of the Division's investigation, this disciplinary action, and all other matters
21 relating thereto.


22 36. Respondent and Bennett hereby indemnifies and holds harmless the State of Nevada, the
23 Department of Business and Industry, the Division, and each of their respective members, agents,
24 employees and counsel in their individual and representative capacities against any and all claims, suits,
25 and actions brought against said persons and/or entities by reason of the Division's investigation, this
26 disciplinary action and all other matters relating thereto, and against any and all expenses, damages, and
27 costs, including court costs and attorney fees, which may be sustained by the persons and/or entities
28 named in this section as a result of said claims, suits, and actions.

37. If Respondent fails to comply with any terms of this consent order as determined by the Division, the matter shall be immediately referred back to the ALJ for violation of the consent order, and the Division may pursue any remedy allowed by law, including administrative fines and costs and all other remedies available pursuant to NRS Chapter 649.


38. Respondent has read, understands, and agrees to all terms stated herein.

IN WITNESS WHEREOF, the parties have each executed and agreed to this consent order as of the date set forth below.

IT IS SO ORDERED this 6th day of October, 2025.



Cara L. Brown
Hearing Officer

CONSENTED TO this 6th day of October, 2025.

PLUSFOUR, INC.

Richard B. Bennett, Owner and President

APPROVED this 6th day of October, 2025.

AARON D. FORD
Attorney General

By: 
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