**COLLECTION SERVICE BOARD**
**500 JAMES ROBERTSON PARKWAY**
**NASHVILLE, TENNESSEE 37243**
**615-741-3600**

**Meeting Minutes for April 8, 2026**
**Davy Crockett Tower**
**Conference Room 1-B**

The Tennessee Collection Service Board met on April 8, 2026, in the first-floor conference room of the Davy Crockett Tower in Nashville, Tennessee. The following business was transacted:

**BOARD MEMBERS PRESENT:** Chip Hellmann, Tony Zikovich, and Jason Hill

**BOARD MEMBERS ATTENDING VIRTUALLY:** Laurie Hadwyn

**STAFF MEMBERS PRESENT:** Gin Binkley, Executive Director; Joseph Wharton, Associate General Counsel; and Karen Condon, Administrative Manager

# Call to Order

Director Binkley called the meeting to order at 9:35 a.m. and members made their presence known via roll call, establishing that a physical quorum was present. Mr. Wharton presented a brief overview of ADA requirements related to comments made during the meeting and roll call votes.

# Agenda

Mr. Hellmann motioned to adopt the agenda as presented. This was seconded by Ms. Hadwyn. The motion passed unanimously.

# Approval of Meeting Minutes

Upon review of the minutes from the January 7, 2026 meeting, Mr. Hellmann motioned to accept them. This was seconded by Mr. Hill. The motion passed unanimously.

# Director's Report

Director Binkley notified the Board that Gregg Swersky has resigned from the Board. Chairman Hellmann acknowledged appreciation for Mr. Swersky's service to the Board. A candidate has been presented for consideration as a replacement.

## Future Meeting Dates

Director Binkley proposed the following meeting dates for 2027:

- January 6, 2027
- April 7, 2027

- July 7, 2027
- October 6, 2027

Mr. Hellmann motioned to approve the proposed meeting dates. This was seconded by Ms. Hadwyn. The motion passed unanimously.

### Budget Update

Director Binkley shared a financial update on the financial position of the Board through the end of February 2026. The board continues to operate in a deficit of $45,753.00. The reserve balance is used to cover that deficit without the immediate need for a fee increase. Recent self-sufficiency hearings revealed no issues.

## Legal

### Legal Report (Presented by Joseph Wharton)

The Board was presented with the following cases:

1. 2025063871
2. 2025070181
3. 2025070621
4. 2025072601
5. 2025066891
6. 2025067961
7. 2025073131
8. 2025073341
9. 2025074201
10. 2025074521
11. 2025076071
12. 2025071091
13. 2025076151
14. 2025076231
15. 2025076691
16. 2026002271
17. 2026003351
18. 2026004701
19. 2025074561
20. 2025076701
21. 2025076901
22. 2026000811
23. 2026001081
24. 2026001641
25. 2026002011
26. 2026003211
27. 2025076681
28. 2026004901
29. 2026006591
30. 2026014341
31. 2026005451
32. 2026005511
33. 2025028321
34. 2025022121

Mr. Wharton provided additional information for four of these cases:

**Item 30**

After the Respondent provided a continuation certificate for a surety bond, confirming that it had remained effective and had not lapsed. The recommendation for this case is changed to closure

**Items 33 and 34**

After conferring with Director Binkley, the recommendation remains the same. Director Binkley has suggested referring to the Attorneys General with jurisdiction over these cases to review on their own merits. That recommendation is now added to the two complaints.

**Item 18**

This case involves a respondent collecting a business debt rather than an individual. The statute does not specify jurisdiction according to the source of the debt, but Rule 0320-05 refers to consumers, and not businesses. The overall statute does not provide this specificity, and Mr. Wharton seeks the Board's input.

Mr. Hellmann motioned to discuss the legal report.  This was seconded by Ms. Hadwyn. The motion passed unanimously.

Discussion:
For items 33 and 34, the cases will be referred to the relevant State's Attorney General—two are in states other than Tennessee.

Item 18—The Board's true purpose is to protect consumers from harm; are businesses considered in that protection?  Statue and Rule do not appear to align.

- The Board is asked to consider this matter relative to the specific scenario of this case.
- Statute does not make a distinction between consumer and business debt.
- Past practice has been to issue discipline against an entity practicing without a license, even if collecting a business debt.
- The Fair Debt Collections Practices Act is federal law, which shows an intent to protect consumers. Our statute does not make this distinction.   Were a lawsuit to be filed by a respondent, a judge would review the law and rules, and a ruling by the court would provide guidance.

Mr. Hellmann motioned to accept the legal report as presented. This was seconded by Ms. Hadwyn.  The motion passed unanimously via roll call vote.

## Legislative Update

The website www.capitol.tn.gov lists current legislative matters.

SB2224/HB2530 proposes a change regarding transmission of complaints to the licensee.  Current law specifies notifications by USPS mail but will now allow alternate methods such as email.

## New Business

Civil Penalty amounts assessed by the Board have not changed in many years, opening an opportunity for a gradual increase.  The Board has consistently applied the same amounts for cases, though some vary due to mitigating or aggravating factors.  To adjust for inflation, there is an opportunity to increase civil penalties.

Director Binkley clarified that a proposed budget does not include revenue from civil penalties, and the Board does not operate under the assumption that we will be funded by civil penalties .  Under the agreed citation policy the board is authorized to assess a civil penalty up to $1,000 per violation.

Mr. Hellmann motioned to instruct legal representation and staff to develop a new civil penalty matrix that also lists the current amounts and the proposed changes, to be discussed and voted on as old business on the next agenda.  This was seconded by Ms. Hadwyn.  The motion passed unanimously via roll call vote.

There were no comments by the public.

## Adjourn

There being no additional business Mr. Hellmann made a motion to adjourn. This was seconded by Ms. Hadwyn. The motion passed unanimously via roll call vote.  The meeting adjourned at 10:38 a.m.

**STATE OF TENNESSEE**
**DEPARTMENT OF COMMERCE AND INSURANCE**
**OFFICE OF LEGAL COUNSEL**
**500 JAMES ROBERTSON PARKWAY**
**NASHVILLE, TENNESSEE 37243**
**TELEPHONE: (615) 741-3072**
**FACSIMILE: (615) 532-4750**

---

**TO:** Tennessee Collection Service Board

**FROM:** Joseph Wharton, Associate General Counsel

**DATE:** April 08, 2026

**SUBJECT:** April Legal Report

---

## NEW CASES

1. **2025063871**
   **Respondent:**
   **License Status: #Active**
   **First Licensed: 04/18/2022**
   **License Expiration: 04/17/2026**
   **Disciplinary History: None**

   **Summary:** This complaint was referred to the Department from the Division of Consumer Affairs. The complaint involves a debt dispute and an allegation that the Respondent engaged in unfair collection practices. The Complainant provided evidence that establishes the Respondent is collecting a vehicle loan deficiency balance via a slow pay order issued by a Tennessee general sessions court. The slow pay order was issued by the court on August 4, 2025. The Complainant asserted that a final judgment and permanent injunction issued in a separate case involving multiple states barred the collection of the vehicle loan deficiency balance. The final judgment and permanent injunction were issued on May 19, 2020. The Complainant alleged that the Respondent is collecting a debt in violation of the final judgement and permanent injunction order. The complaint was issued to the Respondent via U.S. mail and email on October 29, 2025. The Respondent issued a response to the complaint on December 19, 2025. The Respondent denied the Complainant's assertion that the collection of the debt violated the final judgment and permanent injunction. The Respondent stated that they purchased the underlying debt from the original creditor on March 27, 2019. The Respondent asserted that the Complainant received a restitution payment as a result from the final judgment and permanent injunction, but the Complainant's account balance was not forgiven. The rules of the Board prohibit collection services from engaging in unfair practices, which include the collection of any amount unless such amount is expressly authorized by the agreement creating the debt or is permitted by law. *See* Rules of the Tennessee Collection Service Board. 0320-05-.06(1)(a) (Unfair Practices). The general sessions judgment and issuance of a corresponding slow pay order establish that the Respondent was entitled to collect the deficiency balance from the Complainant and did not engage in unfair practices. The remaining allegations of the complaint constitute a debt dispute. The Board does not have jurisdiction over debt disputes i.e., disputed accounts regarding payment, sum balance, or terms. Finally, the Tennessee Collection Service Act requires that licensees file a sworn answer with the Board within 20 days of receipt of a complaint. *See* Tenn. Code Ann. § 62-20-115(a)(3) (Investigations; revocation, suspension or nonrenewal). The Respondent acknowledged that they received the complaint via email on October 29, 2025, but failed to respond before December 19, 2025, due to confusion concerning this complaint and a separate complaint issued by the Attorney General's Office. The Respondent's failure to respond to the complaint within 20 days of receipt constitutes a violation of Tenn. Code Ann. § 62-20-115(a)(3). However, due to the Respondent's explanation and lack of discipline history, a letter of warning regarding Tenn. Code Ann. § 62-20-115(a)(3) (Investigations; revocation, suspension or nonrenewal) appears to be an appropriate resolution to this complaint.

**Recommendation: Letter of Warning regarding § 62-20-115(a)(3) (Investigations; revocation, suspension or nonrenewal).**

**BOARD DECISION: The Board accepted legal counsel's recommendation.**

2. **2025070181**
**Respondent:**
**License Status: Active**
**First Licensed: 10/20/2021**
**License Expiration: 10/19/2027**
**Disciplinary History: 2024-LOW, 2024-LOW, 2024-LOW**

**Summary:** This complaint involves the same Respondent as complaints #2025071091 and #2026001641. The complaint alleges that the Respondent violated the Board's rules regarding validation of a debt and used false or misleading representations in connection with debt collection. The underlying debt is a medical bill, and the Respondent was retained by the current creditor to provide third party collection services on the account. The Complainant issued the Respondent a written debt dispute via certified mail on October 29, 2025. The dispute was mailed to the Respondent's previous address and was returned to the Complainant as "unclaimed." The Complainant issued a second written debt dispute to the Respondent at their current address on November 18, 2025, and it was delivered to the Respondent on November 24, 2025. On November 28, 2025, the Complainant reviewed their Experian credit report and discovered that the Respondent was still reporting the debt on their credit report, and the account was not marked as disputed. The Complainant also received a written settlement offer from the Respondent on November 24, 2025. The settlement offer was dated November 15, 2025, but stated that the offer must be accepted by the Complainant before November 14, 2025. The Complainant alleged that the Respondent's reporting of the account to the credit bureaus on November 28, 2025, violated the Board's rules regarding validation of a disputed debt, and the Respondent's issuance of an invalid settlement offer constituted a false or misleading representation. The Respondent filed a timely response to the complaint on December 18, 2025. The Respondent stated that their official change in address occurred on June 27, 2025. After that date, any mail issued to their prior address was returned to the sender. The Respondent issued the initial collection notice to the Complainant on July 18, 2023, and there is no record that the notice was returned. The Respondent advised that the account was marked as "disputed" with the credit reporting agencies each time the Respondent disputed the account. The Respondent did not report the account as disputed on November 28, 2025, because validation of the debt was issued to the Complainant on November 21, 2025. The Respondent also asserted that they were not required to cease collection activity in response to the Complainant's debt disputes because the disputes were not issued within thirty days of the initial notice sent to the Complainant on July 18, 2023. Finally, the Respondent admitted that the settlement notice was issued in error. One of their agents issued the settlement offer instead of a validation letter by mistake. If a consumer issues a written debt dispute or verification of debt request to a collection service within 30 days of receipt of the initial collection notice, the rules of the Board require that the collection service cease collection of the debt until they provide the consumer with validation documentation. *See* Rules of the Tennessee Collection Service Board. 0320-05-.07(2) (Validation of Debts: Disputed Debts). The Respondent issued the initial collection notice to the Complainant on July 18, 2023, and the Complainant's debt disputes were received after the thirty-day dispute period. The Respondent has an ongoing obligation to provide validation of the debt to the Complainant to ensure that they are collecting a legitimate debt; however, the Respondent was not required to cease collection activity until the validation of debt was issued pursuant to Rules of the Tennessee Collection Service Board. 0320-05-.07(2). Additionally, the rules of the Board prohibit a collection service from communicating or threatening to communicate to any person credit information that is known or should be known to be false, including the failure to communicate that a disputed debt is disputed. *See* Rules of the Tennessee Collection Service Board. 0320-05-.05(1)(h) (False or Misleading Representations). The Respondent reported the Complainant's account as disputed to the credit reporting agencies in response to the Complainant's debt disputes. The account was not marked as disputed on November 28, 2025, because the Respondent had already mailed the validation of debt to the Respondent on November 21, 2025. The Respondent's reporting of the account did not violate Rules of the Tennessee Collection Service Board. 0320-05-.05(1)(h). The Respondent's issuance of an invalid settlement offer to the Complainant also does not constitute a false or misleading representation as the Respondent issued the letter in error and had no intent on using the letter to collect the debt from the Complainant. This fact is supported by the fact that the letter included an invalid acceptance date that expired before the issuance of the letter itself. This situation is differentiated from a scenario in which a collection service issues a settlement letter with the intent to induce a consumer into making a partial payment on the account and then attempts to collect the remaining balance. There does not appear to be a violation of the Tennessee Collection Service Act or the rules of the Board promulgated thereunder.

**Recommendation: Close.**

**BOARD DECISION: The Board accepted legal counsel's recommendation.**

3. **2025070621**
   **Respondent:**
   **License Status: #Expired Grace**
   **First Licensed:03/04/2020**
   **License Expiration: 03/03/2026**
   **Disciplinary History: None**

   **Summary:** This complaint was referred to the Department from the Department of Financial Institutions. The complaint alleges that the Respondent failed to cease collection of a debt until an adequate response was issued to the Complainant's written verification of debt request. The Complainant issued a written debt dispute and verification of debt request to the Respondent via certified mail on November 3, 2025. The Complainant stated that the Respondent responded to the dispute and verification of debt request with generic loan documents that did not include an itemized account balance. The Complainant also stated that the Respondent did not provide proof of ownership of the underlying account. The Complainant alleged that the Respondent continued to report the debt to the credit reporting agencies without issuing adequate documentation to provide verification of the debt. The Respondent filed a timely response to the complaint on December 15, 2025. The Respondent stated that they received the Complainant's debt dispute and verification of debt request on November 3, 2025. In response, the Respondent mailed the Complainant documentation to validate the debt, placed the account in a cease communication status, and reported the account as disputed to the credit reporting agencies on November 12, 2025. The Respondent also attached an itemized account history to their complaint response. If a consumer issues a written debt dispute or verification of debt request to a collection service within 30 days of receipt of the initial collection notice, the rules of the Board require that the collection service cease collection of the debt until they provide the consumer with validation documentation. *See* Rules of the Tennessee Collection Service Board. 0320-05-.07(2) (Validation of Debts: Disputed Debts). In response to the Complainant's written verification of debt request, the Respondent provided the Complainant with validation documentation, ceased communications on the account, and reported the account as disputed to the credit reporting agencies. The Respondent also provided additional validation documentation as part of their complaint response. The Respondent's conduct complied with Rules of the Tennessee Collection Service Board. 0320-05-.07(2). There does not appear to be a violation of the Tennessee Collection Service Act or the rules of the Board promulgated thereunder.

**Recommendation: Close.**

**BOARD DECISION: The Board accepted legal counsel's recommendation.**

4. **2025072601**
**Respondent:**
**License Status: #Active**
**First Licensed:04/23/2014**
**License Expiration: 04/22/2026**
**Disciplinary History: None**

**Summary:** This complaint was referred to the Department from the Division of Consumer Affairs. The complaint alleges that the Respondent reported inaccurate information to the credit reporting agencies. The Complainant noticed that the Respondent reported a collection account on their credit report. The collection account's open date was reported as October 27, 2023, and the date of last payment was reported as November 30, 1999. The Complainant filed this complaint asserting that the collection account's reported date of last payment of November 30, 1999, was inaccurate. The Respondent filed a response to the complaint on December 10, 2025. The Respondent advised that the last payment date of November 30, 1999, was "a null date" that was used in the Respondent's old system when no payments had been made on an account. The Respondent has now removed the inaccurate last payment date from the Complainant's file and requested that the credit reporting agencies delete the account tradeline from the Complainant's credit history. The rules of the Board prohibit a collection service from communicating or threatening to communicate to any person credit information that is known or should be known to be false, including the failure to communicate that a disputed debt is disputed. *See* Rules of the Tennessee Collection Service Board. 0320-05-.05(1)(h) (False or Misleading Representations). The Respondent knew or should have known that the date of last payment reported to the credit reporting agencies was false because November 30, 1999, was an entry used by the Respondent as a business practice. The date has no connection to the Complainant's account and should not have been communicated or reported to any third parties. The Respondent's conduct constitutes a violation of Rules of the Tennessee Collection Service Board. 0320-05-.05(1)(h) (False or Misleading Representations). However, based on the Respondent's remedial actions and lack of discipline history, a letter of warning regarding Rules of the Tennessee Collection Service Board. 0320-05-.05(1)(h) (False or Misleading Representations) appears to an appropriate resolution to this complaint.

**Recommendation: Letter of Warning regarding Rules of the Tennessee Collection Service Board. 0320-05-.05(1)(h) (False or Misleading Representations).**

**BOARD DECISION: The Board accepted legal counsel's recommendation.**

5. **2025066891**
**Respondent:**
**License Status: Active**

**First Licensed: 11/20/2008**
**License Expiration: 04/15/2027**
**Disciplinary History: 2014-Letter of warning, 2017-LOW, 2017-Consent order**

**Summary:** This complaint was referred to the Department from the Division of Consumer Affairs. The complaint alleges that the Respondent used false and misleading representations to collect a debt by reporting two of the Complainant's medical debts to the credit reporting agencies. In May 2025, the Complainant discovered that two medical debts were reported on their TransUnion credit report by the Respondent. The Complainant asserted that the Respondent violated Tennessee Senate Bill 1833 (2024) by reporting medical debts to the credit reporting agencies, and that such conduct constitutes a false or misleading representation. The Respondent filed a response to the complaint on January 18, 2026. The Respondent stated that Tennessee Senate Bill 1833 (2024) was not passed by the Tennessee Legislature, and there is no current prohibition from reporting medical debts over $500 to the credit reporting agencies. The rules of the Board prohibit a collection service from using any false representation or deceptive means to collect or attempt to collect any debt or to obtain information concerning a consumer. *See* Rules of the Tennessee Collection Service Board. 0320-05-.05(1)(j) (False or Misleading Representations). The Respondent's assertion was correct. Tennessee Senate Bill 1833 (2024) was not passed by the Tennessee Legislature, and there is no current prohibition from reporting medical debts over $500 to the credit reporting agencies. Therefore, the Respondent's conduct does not constitute a false or misleading representation as defined by Rules of the Tennessee Collection Service Board. 0320-05-.05(1)(j). Finally, the Tennessee Collection Service Act requires that licensees file a sworn answer with the Board within 20 days of receipt of a complaint. *See* Tenn. Code Ann. § 62-20-115(a)(3) (Investigations; revocation, suspension or nonrenewal). The Board's administrative staff issued the Respondent a copy of the complaint and a response request via U.S. mail and email on November 12, 2025. After not receiving a response, the complaint documents were issued to the Respondent again on December 30, 2025. The Respondent finally filed a response to the complaint on January 18, 2026. The Respondent's failure to issue a sworn response to the complaint within 20 days of receipt constitutes a violation of Tenn. Code Ann. § 62-20-115(a)(3).

**Recommendation: Consent Order with a $250.00 civil penalty plus costs when necessary and authorization for formal hearing for violation of Tenn. Code Ann. § 62-20-115(a)(3) (Investigations; revocation, suspension or nonrenewal).**

**BOARD DECISION: The Board accepted legal counsel's recommendation.**

6. **2025067961**
**Respondent:**
**License Status: Unlicensed**
**First Licensed: n/a**
**License Expiration: n/a**
**Disciplinary History: None**

**Summary:** This complaint alleges that the Respondent violated several of the Boards rules during the collection of a debt from the Complainant. The underlying debt is a medical bill. The Complainant received medical services in September 2025. On November 4, 2025, the Complainant discovered that the medical bill was referred to a collection service by the Respondent. On November 16, 2025, the Complainant received the initial collection notice from the collection service. The Complainant then contacted the collection service and requested that they provide verification of debt due to a discrepancy in the account balance. The Complainant stated that the collection service did not provide the requested validation of debt documentation and continued to engage in collection activity. The Complainant filed this complaint due to the Respondent's referral of the account to a collection agency without first attempting to collect the debt directly from the Complainant and the Respondent's failure to provide validation of the debt. The Respondent filed a response to the complaint on December 30, 2025. The Respondent advised that they are medical services provider not a collection service. The Respondent provides medical services and bills patients for performed services. The Board does not have jurisdiction over the Respondent because the Respondent is not a collection service.

**Recommendation: Close.**

**BOARD DECISION: The Board accepted legal counsel's recommendation.**

7. **2025073131**
**Respondent:**
**License Status: #Active**
**First Licensed: 09/16/1986**
**License Expiration: 12/31/2026**
**Disciplinary History: 2006-LOW, 2008-CO, 2010-LOW, 2010-LOW, 2010-CO, 2023-LOW**

**Summary:** This complaint was referred to the Department from the Division of Consumer Affairs. The complaint involves a debt dispute and an allegation that the Respondent failed to issue a validation of debt in response to the Complainant's written verification of debt request. The Complainant received an initial collection notice from the Respondent in July 2025. Within 30 days, the Complainant issued a written debt dispute and verification of debt request to the Respondent. The Complainant asserted that the account balance was incorrect because it did not reflect 2 payments made in February 2025 totaling $150. The Complainant stated that they never received a response from the Respondent, and the Respondent continued to engage in collection activity on the account. The Respondent filed a timely response to the complaint on December 22, 2025. The Respondent stated that in response to the Complainant's debt dispute and verification of debt request, they obtained validation documentation from the Complainant. The Respondent then confirmed the Complainant's mailing address and email address via phone call and issued the validation documentation to the Complainant. The validation documentation included copies of the complete account statement, underlying contract, financial agreement, and payment history. The Respondent stated that they have not made any additional collection attempts since the Complainant issued the debt dispute. The basis of this complaint is a debt dispute regarding the account balance between the Complainant and the creditor. If a consumer issues a written debt dispute or verification of debt request to a collection service within 30 days of receipt of the initial collection notice, the rules of the Board require that the collection service cease collection of the debt until they provide the consumer with validation documentation. *See* Rules of the Tennessee Collection Service Board. 0320-05-.07(2) (Validation of Debts: Disputed Debts). The Respondent's conduct in response to the Complainant's debt dispute complied with Rules of the Tennessee Collection Service Board. 0320-05-.07(2), and the Board does not have jurisdiction over debt disputes i.e., disputed accounts regarding payment, sum balance, or terms. There does not appear to be a violation of the Tennessee Collection Service Act or the rules of the Board promulgated thereunder.

**Recommendation: Close.**

**BOARD DECISION: The Board accepted legal counsel's recommendation.**

**8. 2025073341**
**Respondent:**
**License Status: #Active**
**First Licensed: 10/11/2018**
**License Expiration: 10/10/2026**
**Disciplinary History: 2024-LOW**

**Summary:** This complaint alleges that the Respondent failed to issue a car title to the Complainant after the vehicle contract was paid in full. The Complainant entered into a lease-to-own contract for a vehicle with a dealership. After the lease-to-own contract was signed, the dealership declared Chapter 7 bankruptcy, and all of the dealership's contracts and accounts were assigned to a new creditor. The Respondent provides collection services for the new creditor but does not hold or issue vehicle titles. The Respondent filed a timely response to the complaint on December 18, 2025, advising that they were unable to identify the Complainant in their records. The allegations in the complaint relate to the dealership and the issuance of the vehicle title. The Board does not have jurisdiction over the dealership or the issuance of vehicle titles. There does not appear to be a violation of the Tennessee Collection Service Act or the rules of the Board promulgated thereunder.

**Recommendation: Close.**

**BOARD DECISION: The Board accepted legal counsel's recommendation.**

**9. 2025074201**
**Respondent:**
**License Status: Active**
**First Licensed: 9/11/1997**
**License Expiration: 12/31/2026**
**Disciplinary History: 2006-CO, 2007-LOW, 2007-CO, 2008-CO, 2009- LOW, 2011-LOW, 2016-CO, 2018-CO, 2024-LOW**

**Summary:** This complaint alleges that the Respondent violated the Board's rules regarding debt collection communications by placing collection calls to the Complainant after 9:00 p.m. The Complainant stated that in December 2025 they received collection calls from the Respondent at 10:08 p.m., 10:36 p.m., 10:45 p.m., and 10:46 p.m., central time. The Complainant attached screenshots of the Respondent's calls to substantiate their allegation. The Respondent filed a timely response to the complaint on January 9, 2026. The Respondent stated that the identified collection calls were mistakenly issued to the Complainant. The Respondent was attempting to contact another consumer, and a third party mistakenly provided them with the Consumer's phone number. The consumer that the Respondent was attempting to contact resided in California, and the Complainant's phone number has a California area code. The Respondent claimed they were unaware that they were contacting the incorrect consumer until the Complainant filed this complaint. After the Respondent received this complaint, they marked the Complainant's phone number as a wrong number in their system to prevent future collection calls. The rules of the Board prohibit a collection service from communicating with a consumer in connection with the collection of any debt at any unusual or inconvenient time or place. *See* Rules of the Tennessee Collection Service Board. 0320-05-.03(1)(a)(1) (Communication in Connection with Debt Collection: Communication with the Consumer Generally). A collection service shall assume that the convenient time for communicating with a consumer is after 8:00 a.m. and before 9:00 p.m., local time at the consumer's location. *Id*. The Respondent was attempting to contact a consumer located in California not the Complainant located in Tennessee. The Respondent's calls were issued to a California phone number before 9:00 p.m., pacific time. The Respondent reasonably believed that they were contacting a consumer in a manner that complied with the Rules of the Tennessee Collection Service Board. 0320-05-.03(1)(a)(1). There does not appear to be a violation of the Tennessee Collection Service Act or the rules of the Board promulgated thereunder.

**Recommendation: Close.**

**BOARD DECISION: The Board accepted legal counsel's recommendation.**

**10. 2025074521**
**Respondent:**
**License Status: #Active**
**First Licensed: 05/03/1994**
**License Expiration: 12/31/2026**
**Disciplinary History: None**

**Summary:** This complaint involves a debt dispute. The Complainant received medical services from a hospital in November 2024. The Complainant's health insurer paid $1,642.65 toward the claim, which left a balance of $250. The $250 remaining balance represented the Complainant's out-of-pocket deductible, and the Complainant paid it in full. The Complainant stated that the hospital submitted a duplicate bill for the same medical services on August 25, 2025. The Complainant disputed the duplicate medical bill with the hospital on several occasions, but the account was referred to the Respondent for collections on November 28, 2025. The Complainant received a collection notice from the Respondent on December 10, 2025, and issued a written debt dispute in response. The Complainant then filed this complaint based on the assertion that the Respondent attempted to collect an illegitimate debt. The Respondent filed a timely response to the complaint on December 30, 2025. The Respondent advised that the initial collection notice was the only statement issued to the Complainant. When the Respondent received the complaint, they contacted the hospital to investigate the account and verify the balance. The hospital then advised the Respondent to close the Complainant's account, and they would continue to investigate the matter. The Respondent closed the Complainant's file in their system and returned the account to the hospital. The basis of this complaint is a debt dispute between the Complainant and the hospital. If a consumer issues a written debt dispute or verification of debt request to a collection service within 30 days of receipt of the initial collection notice, the rules of the Board require that the collection service cease collection of the debt until they provide the consumer with validation documentation. *See* Rules of the Tennessee Collection Service Board. 0320-05-.07(2) (Validation of Debts: Disputed Debts). The Respondent's conduct in response to the Complainant's debt dispute complied with Rules of the Tennessee Collection Service Board. 0320-05-.07(2), and the Board does not have jurisdiction over debt disputes i.e., disputed accounts regarding payment, sum balance, or terms. There does not appear to be a violation of the Tennessee Collection Service Act or the rules of the Board promulgated thereunder.

**Recommendation: Close.**

**BOARD DECISION: The Board accepted legal counsel's recommendation.**

**11. 2025076071**
**Respondent:**
**License Status: Active**
**First Licensed: 12/07/2018**
**License Expiration: 12/06/2026**
**Disciplinary History: None**

**Summary:** This complaint alleges that the Respondent engaged in fraud and failed to cease collection of a debt until an adequate validation of debt was issued to the Complainant. On June 23, 2025, the Complainant received a text message from the Respondent that contained an initial collection notice. The notice advised that the Respondent was providing third party collection services regarding a cable contract account with an outstanding balance of $362.86. The Complainant asserted that the Respondent's initial collection notice was fraudulent because it was issued to an inaccurate address. The Complainant received additional collection texts from the Respondent on June 26, 2025, June 29, 2025, and July 1, 2025. On July 1, 2025, the Complainant replied with "Stop" to opt out of future text messages. The Complainant filed a CFPB complaint against the Respondent on July 13, 2025, that demanded the Respondent cease future collection action and provide validation of the debt. The Respondent responded to the CFPB complaint on July 25, 2025. The Respondent provided account statements covering November 3, 2024, to January 25, 2025, as validation of the debt. The Complainant asserted that the account statements provided by the Respondent did not constitute an adequate validation of debt, and the Respondent continued to engage in collection activity by reporting the account to the credit reporting agencies. The Respondent filed a timely response to the complaint on January 6, 2026. The Respondent provided a summary of the account history that explains the current account balance. The Respondent also provided the account statements that were previously issued to the Complainant on July 25, 2025. However, the account statements do not verify that the current account balance is balance is accurate. The account balance on the statement issued on January 25, 2025, was $712.86, but the Respondent asserted in their initial collection notice that the account balance was $362.86. The Respondent stated the difference in account balances was due to the Complainant's return of equipment. The January 2025 account balance of $712.86 included a fee for unreturned equipment, which was removed when the equipment was returned. However, the Respondent did not provide an account statement or any other documentation issued by the creditor that verified the current account balance of $362.86. If a consumer issues a written debt dispute or verification of debt request to a collection service within 30 days of receipt of the initial collection notice, the rules of the Board require that the collection service cease collection of the debt until they provide the consumer with validation documentation. *See* Rules of the Tennessee Collection Service Board. 0320-05-.07(2) (Validation of Debts: Disputed Debts). The account documentation provided by the Respondent in July 2025 and in response to this complaint does not constitute an adequate validation of the debt because the documentation does not establish that current balance is accurate. The Respondent's collection activity after receipt of the July CFPB complaint violated the Rules of the Tennessee Collection Service Board. 0320-05-.07(2) because the Complainant had not been provided with an adequate validation of debt in response to the debt dispute. Finally, in regards to the allegation of fraud, the Respondent advised that the address listed on the initial collection notice was the address on file with the creditor when the account was referred to the Respondent for collections. There is no evidence that the Respondent engaged in fraud in connection with the collection of Complainant's account.

**Recommendation: Consent Order with a $250.00 civil penalty plus costs when necessary and authorization for formal hearing for violation of Rules of the Tennessee Collection Service Board. 0320-05-.07(2) (Validation of Debts: Disputed Debts).**

**BOARD DECISION: The Board accepted legal counsel's recommendation.**

**12. 2025071091**

**Respondent:**
**License Status: Active**
**First Licensed: 10/20/2021**
**License Expiration: 10/19/2027**
**Disciplinary History: 2024-LOW, 2024-LOW, 2024-LOW**

**Summary:** This complaint involves the same Respondent as complaints #2025070181 and #2026001641. The complaint alleges that the Respondent failed to cease collection of a debt until an adequate response was issued to the Complainant's written verification of debt request. The Complainant issued written verification of debt requests to the Respondent on September 17, 2025, and October 13, 2025. The Complainant also requested verification documentation as part of a CFPB complaint filed against the Respondent on September 28, 2025. The Complainant filed this complaint on December 3, 2025, because they had not received a validation of debt from the Respondent and the account was still being reported to the credit bureaus. The Respondent contacted the Board on December 23, 2025, and requested a deadline extension to submit a response to the complaint. The Respondent submitted their response to the complaint on January 9, 2026, before the deadline extension expired. The Respondent stated that they did not receive the Complainant's written verification debt request issued on September 17, 2025 and October 13, 2025. The Respondent's address changed on June 27, 2025, After that date, any mail issued to their prior address was returned to the sender. The Respondent received an indirect dispute regarding the Complainant's account through the e-OSCAR system on September 23, 2025. The Respondent reported the account as disputed and conducted an investigation on the account. The Respondent's investigation established that the information reported to the credit reporting agencies was accurate. When the Respondent received the CFPB complaint filed on September 28, 2025, they reported the account as disputed and responded with validation documentation on October 15, 2025. The Respondent also placed the Complainant's account in a cease communication status and submitted a tradeline deletion request to the credit reporting agencies. If a consumer issues a written debt dispute or verification of debt request to a collection service within 30 days of receipt of the initial collection notice, the rules of the Board require that the collection service cease collection of the debt until they provide the consumer with validation documentation. *See* Rules of the Tennessee Collection Service Board. 0320-05-.07(2) (Validation of Debts: Disputed Debts). The Respondent reported the account as disputed, investigated the account, and issued validation documentation to the Complainant in response to the debt disputes. The Respondent's conduct complied with Rules of the Tennessee Collection Service Board. 0320-05-.07(2). There does not appear to be a violation of the Tennessee Collection Service Act or the rules of the Board promulgated thereunder.

**Recommendation: Close.**

**BOARD DECISION: The Board accepted legal counsel's recommendation.**

**13. 2025076151**

**Respondent:**
**License Status: -Active**
**First Licensed: 03/19/2008**
**License Expiration: 3/18/2027**
**Disciplinary History: 2021-LOW, 2024-LOW**

**Summary:** This complaint involves a debt dispute and a validation of debt. The Complainant received an initial collection notice from the Respondent on December 11, 2025. The underlying debt is a residential lease balance. On December 27, 2025, the Complainant issued a written debt dispute to the Respondent and filed this complaint with the Board. As part of the debt dispute and complaint, the Complainant requested that the Respondent provide copies of the state court judgment, residential lease, and itemized account ledger to verify the debt's legitimacy. The Respondent filed a timely response to the complaint on January 12, 2026. The creditor referred the account to the Respondent for third-party collection services on December 3, 2025. The Respondent issued the initial collection notice to the Complainant on December 11, 2025. When the Respondent received the debt dispute and complaint, they investigated the account and contacted the creditor to obtain the requested verification documentation. The creditor did not provide the verification documentation within a reasonable amount of time, and the Respondent decided to close and return the Complainant's file to the creditor. The rules of the Board do not require that the initial notice of debt contain supporting validation documentation. *See* Rules of the Tennessee Collection Service Board. 0320-05-.07(1) (Validation of Debts: Notice of Debt; Contents). If a consumer issues a written debt dispute or verification of debt request to a collection service within 30 days of receipt of the initial collection notice, the rules of the Board require that the collection service cease collection of the debt until they provide the consumer with validation documentation. *See* Rules of the Tennessee Collection Service Board. 0320-05-.07(2) (Validation of Debts: Disputed Debts). The Respondent issued an initial notice of debt that contained the information and disclosures required by Rules of the Tennessee Collection Service Board. 0320-05-.07(1), and the Respondent initiated an investigation on the account in response to the Complainant's debt dispute pursuant to Rules of the Tennessee Collection Service Board. 0320-05-.07(2). The Respondent's conduct cited in the complaint complied with the rules of the Board. There does not appear to be a violation of the Tennessee Collection Service Act or the rules of the Board promulgated thereunder.

**Recommendation: Close.**

**BOARD DECISION: The Board accepted legal counsel's recommendation.**

**14. 2025076231**

**Respondent:**
**License Status: Active**
**First Licensed: 08/27/2014**
**License Expiration: 08/26/2026**
**Disciplinary History: None**

**Summary:** This complaint involves a debt dispute. On December 19, 2025, the Complainant received a collection notice from the Respondent regarding a medical debt. The Complainant filed this complaint asserting that the amount of the debt was inflated by the Respondent. The Respondent filed a timely response to the complaint on January 5, 2026. The Respondent advised that prior to this complaint they had not received any communications from the Complainant. The Respondent attached the signed financial agreement and the final account statement to their response. The basis of this complaint is a debt dispute regarding the account balance. The Board does not have jurisdiction over debt disputes i.e., disputed accounts regarding payment, sum balance, or terms. There does not appear to be a violation of the Tennessee Collection Service Act or the rules of the Board promulgated thereunder.

**Recommendation: Close.**

**BOARD DECISION: The Board accepted legal counsel's recommendation.**

**15. 2025076691**

**Respondent:**
**License Status: Active**
**First Licensed: 11/23/2021**
**License Expiration: 11/22/2027**
**Disciplinary History: 2023-LOW**

**Summary:** This complaint involves the same Respondent as complaints #2026004901 and #2026006591. The complaint alleges that the Respondent violated the Rules of the Board by continuing to report two collection accounts to the credit reporting agencies after the Complainant issued a cease-and-desist demand to the Respondent. In December 2025, the Complainant discovered that there were three collection accounts reported on their credit report. The Respondent is the collection agency for two of the accounts. The Complainant issued written demands to cease communication to the Respondent and the credit reporting agencies. The Respondent and the credit reporting agencies did not remove the account tradelines from the Complainant's credit report, and the Complainant filed this complaint. The Respondent filed a timely response to the complaint January 12, 2026. The Respondent advised that they are providing third-party collection services for the current creditor. The Respondent received the Complainant's cease communication demands for each account and placed both of Complainant's accounts in a cease communication status in their system. The Respondent also updated the status of both accounts as "disputed" with the credit reporting agencies and issued validation documentation to the Complainant. The rules of the Board state that if a consumer notifies a collection service in writing that the consumer refuses to pay a debt or that the consumer wishes that the collection service cease further communication with the consumer, the collection service shall not communicate further with the consumer with respect to such debt. *See* Rules of the Tennessee Collection Service Board. 0320-05-.03(3) (Communication in Connection with Debt Collection: Ceasing Communication). The rules regarding ceasing communication require that a collection service cease further communications with the consumer not the credit reporting agencies, if otherwise appropriate. There is no evidence that the Respondent contacted the Complainant regarding these accounts after the cease communication demands were issued, and the Respondent was not prohibited from reporting accurate information regarding the accounts to the credit reporting agencies. The Respondent reported the Complainant's accounts as "disputed" to the credit reporting agencies and issued validation documentation to the Complainant. The Respondent's conduct cited in the complaint complied with Rules of the Tennessee Collection Service Board. 0320-05-.03(3). There does not appear to be a violation of the Tennessee Collection Service Act or the rules of the Board promulgated thereunder.

**Recommendation: Close.**

**BOARD DECISION: The Board accepted legal counsel's recommendation.**

**16. 2026002271**

**Respondent:**

**License Status: Active**
**First Licensed: 03/18/2019**
**License Expiration: 03/17/2027**
**Disciplinary History: 2024-LOW**

**Summary:** This complaint alleges that the Respondent engaged in unfair collection practices by refusing to accept information from a consumer and their employer over the phone. The Complainant is the employer of the consumer responsible for the underlying medical debt. One of the Complainant's employees sustained a work-related injury that required medical services. The injury was subject to Workers Compensation coverage. One of the employee's medical providers submitted an account to the Respondent for third-party collections. After the consumer (employee) received a collection notice from the Respondent, they asked the Complainant (employer) to contact the Respondent and advise of the Workers Compensation coverage related to the injury and resulting medical bills. The consumer requested that the Complainant make they call on their behalf because they are not fluent in English. During the first phone call with the Complainant, the Respondent advised that they were not authorized to discuss the account with third parties and needed to speak directly to the consumer. The Complainant, the consumer and a translator then called the Respondent together to discuss the account. During the second phone call, there was a discrepancy with the consumer's date of birth, and the Respondent refused once again to discuss the account. This complaint was filed after the second call due to the Respondent's refusal to accept the Workers Compensation information over the phone. The Respondent filed a response a timely response to the complaint on January 21, 2026. The Respondent stated that they refused to discuss the account during the second call because they were unable to appropriately identify the Complainant. The rules of the Board prohibit a collection service from using unfair or unconscionable means to collect or attempt to collect any debt. *See* Rules of the Tennessee Collection Service Board. 0320-05-.06(1) (Unfair Practices). The rules of the Board also prohibit a collection service from communicating with any person other than the consumer, the consumer's attorney, the creditor, the creditor's attorney, or a credit reporting agency without the prior consent of the consumer or the express permission of a court of competent jurisdiction. *See* Rules of the Tennessee Collection Service Board. 0320-05-.03(2)(a) (Communication in Connection with Debt Collection: Communication with Third Parties). The Respondent's refused to discuss the account during the two phone calls with the Complainant because they did not have consumer's consent to discuss the account with third parties, and they could not appropriately identify the consumer by their birth date. The Respondent's conduct cited in the complaint complied with Rules of the Tennessee Collection Service Board. 0320-05-.03(2)(a) and does not constitute an unfair practice pursuant to Rules of the Tennessee Collection Service Board. 0320-05-.06(1). There does not appear to be a violation of the Tennessee Collection Service Act or the rules of the Board promulgated thereunder.

**Recommendation: Close.**

**BOARD DECISION: The Board accepted legal counsel's recommendation.**

**17. 2026003351**

**Respondent:**
**License Status: Active**
**First Licensed: 02/20/1975**
**License Expiration: 12/31/2026**
**Disciplinary History: 2024-LOW**

**Summary:** This complaint was referred to the Department from the Division of Consumer Affairs. The complaint involves a debt dispute. The Respondent was retained as a third-party collection service by a medical provider to collect a debt from the Complainant. The Complainant was contacted by the Respondent regarding the debt in December 2026. The Complainant then notified the medical provider and the Respondent that they disputed the debt on the basis of insurance coverage. The Complainant asserted that they had health insurance when they received the medical services, and the medical debt should have been covered by the insurer. The Respondent filed a timely response to the complaint on January 16, 2026. In response to the Complainant's debt dispute, the Respondent ceased collection activity on the account and contacted the medical provider for verification of the account. The medical provider asserted that there was no insurance information submitted on behalf of the Complainant, and the account was marked as "self-pay" in their system. The Respondent provided an email address that the Complainant can utilize to submit dispute documentation. The basis of this complaint is a debt dispute between the Complainant and the medical provider. If a consumer issues a written debt dispute or verification of debt request to a collection service within 30 days of receipt of the initial collection notice, the rules of the Board require that the collection service cease collection of the debt until they provide the consumer with validation documentation. *See* Rules of the Tennessee Collection Service Board. 0320-05-.07(2) (Validation of Debts: Disputed Debts). The Respondent's conduct in response to the Complainant's debt dispute complied with Rules of the Tennessee Collection Service Board. 0320-05-.07(2), and the Board does not have jurisdiction over debt disputes i.e., disputed accounts regarding payment, sum balance, or terms. There does not appear to be a violation of the Tennessee Collection Service Act or the rules of the Board promulgated thereunder.

**Recommendation: Close.**

**BOARD DECISION: The Board accepted legal counsel's recommendation.**

**18. 2026004701**

**Respondent:**
**License Status: Unlicensed**

**First Licensed: n/a**
**License Expiration: n/a**
**Disciplinary History: None**

**Summary:** This complaint was referred to the Department from the Division of Consumer Affairs. The Complainant is the owner of an engineering firm located in Tennessee. The Complainant started receiving collection notices from the Respondent on November 14, 2025, regarding a debt owed by the company. The Complainant conducted a license search through the Department's website and discovered that the Respondent does not have a Tennessee collection service license. The Respondent filed a response to the complaint on January 21, 2026. The Respondent is located in another state. The Respondent stated that they are a debt collection agency engaged in commercial debt collection. The Respondent admitted in their response that they do not have a valid Tennessee collection service. However, the Respondent asserted that their conduct did not violate the Tennessee Collection Service Act because they are not engaged in consumer collections. The Tennessee Collection Service Act prohibits any person from commencing, conducting, or operating a collection service in Tennessee without a valid collection service license issued by the Board. *See* Tenn. Code Ann. § 62-20-105(a) (Licenses). The Tennessee Collection Service Act defines a "collection service" as any person that engages in, or attempts to engage in, the collection of delinquent accounts, bills or other forms of indebtedness irrespective of whether the person engaging in or attempting to engage in collection activity has received the indebtedness by assignment or whether the indebtedness was purchased by the person engaging in, or attempting to engage in, the collection activity. "Collection service" does not include any person that engages in, or attempts to engage in, the collection of notes or guarantees. *See* Tenn. Code Ann. § 62-20-102(3) (Definitions). The Respondent appears to constitute a "collection service" pursuant to Tenn. Code Ann. § 62-20-102(3); therefore, they are required to possess a valid Tennessee collection service license in order to collect from entities in Tennessee. The Respondent's conduct constitutes a violation of Tenn. Code Ann. § 62-20-105(a) (Licenses).

**Recommendation: Consent Order with a $500.00 civil penalty plus costs when necessary and authorization for formal hearing for violation of Tenn. Code Ann. § 62-20-105(a) (Licenses).**

**BOARD DECISION: The Board accepted legal counsel's recommendation.**

**19. 2025074561**
**Respondent:**
**License Status: Active**
**First Licensed: 07/29/1999**
**License Expiration: 12/31/2026**
**Disciplinary History: 2020-LOW**

**Summary:** This complaint alleges that the Respondent violated the Board's rules regarding debt collection communications by placing collection calls to the Complainant after 9:00 p.m. The Complainant asserted that they received a collection call from the Respondent at

11:12 p.m. on October 25, 2025. The Complainant attached a screenshot of a missed call received on October 25, 2025, at 11:12 p.m. to substantiate their allegation. An agreed citation was issued to the Respondent on December 23, 2025. The Respondent declined to sign the agreed citation and filed a response to the complaint on January 22, 2026. The Respondent provided their phone records for the Complainant's account on October 23, 2025. The Respondent's records indicate that the Respondent made on phone call to the Complainant on October 23, 2025. The phone call was placed at 2:05 p.m. The Respondent also placed the Complainant's phone number on their "Do Not Call List" to prevent future collection calls. The rules of the Board prohibit a collection service from communicating with a consumer in connection with the collection of any debt at any unusual or inconvenient time or place. *See* Rules of the Tennessee Collection Service Board. 0320-05-.03(1)(a)(1) (Communication in Connection with Debt Collection: Communication with the Consumer Generally). A collection service shall assume that the convenient time for communicating with a consumer is after 8:00 a.m. and before 9:00 p.m., local time at the consumer's location. *Id*. The Complainant's screenshot of the missed call identified a phone number that does not belong to the Respondent. The phone number contains a Tennessee area code, and the Respondent is located in another state. The evidence submitted by the Complainant and the Respondent establish that the Respondent did not place the phone call that served as the basis of the complaint. There does not appear to be a violation of the Tennessee Collection Service Act or the rules of the Board promulgated thereunder.

**Recommendation: Close.**

**BOARD DECISION: The Board accepted legal counsel's recommendation.**

**20. 2025076701**

**Respondent:**
**License Status: Active**
**First Licensed: 06/03/2021**
**License Expiration: 06/02/2027**
**Disciplinary History: None**

**Summary:** This complaint involves the same Respondent as complaint #2026000811. The complaint alleges that the Respondent violated the rules of the Board by continuing to report credit information to the credit reporting agencies after the Complainant issued a cease-and-desist demand to the Respondent. In December 2025, the Complainant discovered that there were three collection accounts reported on their credit report. The Respondent is the current owner of one of the collection accounts. The Complainant issued written demands to cease communication to the Respondent and the credit reporting agencies. The Respondent and the credit reporting agencies did not remove the account tradelines from the Complainant's credit report, and the Complainant filed this complaint. The Respondent filed a timely response to the complaint January 26, 2026. The Respondent investigated the Complainant's account and attached copies of the original application and contract as validation of the debt. The Respondent also placed the Complainant's account in a cease communication status in their system to prevent future collection communications. Finally, the Respondent stated that they were going to continue to report the Complainant's verified account information to the credit reporting agencies. The rules of the Board state that if a consumer notifies a collection service in writing that the consumer refuses to pay a debt or that the consumer wishes that the collection service cease further communication with the consumer, the collection service shall not communicate further with the consumer with respect to such debt. *See* Rules of the Tennessee Collection Service Board. 0320-05-.03(3) (Communication in Connection with Debt Collection: Ceasing Communication). The rules regarding ceasing communication require that a collection service cease further communications with the consumer not the credit reporting agencies, if otherwise appropriate. The Respondent's conduct cited in the complaint complied with Rules of the Tennessee Collection Service Board. 0320-05-.03(3). There does not appear to be a violation of the Tennessee Collection Service Act or the rules of the Board promulgated thereunder.

**Recommendation: Close.**

**BOARD DECISION: The Board accepted legal counsel's recommendation.**

**21. 2025076901**

**Respondent:**
**License Status: Unlicensed**
**First Licensed: n/a**
**License Expiration: n/a**
**Disciplinary History: None**

**Summary:** The complaint alleges that the Respondent operated as a collection service in Tennessee without a valid Tennessee collection service license. The Complainant is a resident of Tennessee. The Complainant has a personal line of credit that was issued by a bank. The Respondent acts as an authorized service provider for the bank. The Complainant provided an account statement and an email that were issued by the Respondent. The email was issued on December 2, 2025, and advised the Complainant that the minimum payment due in November 2025 was not received. The email also advised that the account information was reported to TransUnion and failure to remedy the account could impact the Complainant's credit score. The Complainant used the Department's website to conduct a license search on the Respondent. The Complainant discovered that the Respondent did not posses a valid Tennessee collection service license and filed this complaint. The Respondent filed a response to the complaint on January 26, 2026. The Respondent advised that they serve as an authorized service provider for the bank. The Respondent's functions include delivering customer communications, issuing required notices and disclosures, providing customer service support, and facilitating payment processing. The Respondent stated they perform these services on behalf of the bank, and their activities are structured and operated in accordance with applicable legislative and regulatory requirements. The Tennessee Collection Service Act prohibits any person from commencing, conducting, or operating a collection service in Tennessee without a valid collection service license issued by the Board. *See* Tenn. Code Ann. § 62-20-105(a) (Licenses). However, there are several exemptions to the Tennessee Collection Service

Act. *See* Tenn. Code Ann. § 62-20-103 (Exemptions). Tenn. Code Ann. § 62-20-103(3) states, “any person engaged in the collection of indebtedness incurred in the normal course of business or the business of a parent, subsidiary or affiliated firm or corporation; however, no person who is or represents the person to be a collection service is exempt from this chapter.” The Respondent is engaged in the collection of indebtedness incurred in the normal course of business of an affiliated bank, and the Respondent does not constitute a “collection service” because they provide a range services for open and active accounts held by their affiliated bank. Therefore, the Respondent is exempt from the Tennessee Collection Service Act pursuant to Tenn. Code Ann. § 62-20-103(3), and the Board does not have jurisdiction over the Respondent’s conduct.

**Recommendation: Close.**

**BOARD DECISION: The Board accepted legal counsel’s recommendation.**

**22. 2026000811**
**Respondent:**
**License Status: Active**
**First Licensed: 06/03/2021**
**License Expiration: 06/02/2027**
**Disciplinary History: None**

**Summary:** This complaint was referred to the Department from the Department of Financial Institutions and involves the same Respondent as complaint #2025076701. The complaint alleges that the Respondent violated several rules of the Board. The Complainant filed several debt disputes regarding a debt currently owned by the Respondent. The Complainant disputed that they were the debtor responsible for the debt. The Complainant also requested that the Respondent provide several pieces of documentation in order to verify the debt’s legitimacy including proof of the assignment that established the Respondent as the owner of the account. On July 23, 2025, the Respondent issued a validation of debt letter to the Respondent that related to a different consumer and account. The letter included the individual’s address, account number, and debt balance. The Respondent also did not provide proof of the assignment of the Complainant’s account. The Complainant filed this complaint alleging that the Respondent’s issuance of credit information unrelated to the Complainant and the Respondent’s failure to provide proof of the assignment of the account constituted violations of laws pertaining to the collection industry. The Respondent filed a timely response to the complaint on January 26, 2026. The Respondent asserted that the debt is valid. The Respondent stated that their investigation on the account established that the Complainant was the debtor responsible for the debt. The original loan application identified a person with the same first name but different last name than the Complainant. However, the last 4 digits of the applicant’s social security number and the email address on the loan application match those of the Complainant. The Respondent attached the underlying contract to their complaint response. The Respondent advised that they were going to continue to report the account information to the credit reporting agencies. If a consumer issues a written debt dispute or verification of debt request to a collection service within 30 days of receipt of the initial collection notice, the rules of the Board require that the collection service cease collection of the debt until they provide the consumer with validation documentation. *See* Rules of the Tennessee Collection Service Board. 0320-05-.07(2) (Validation of Debts: Disputed Debts). The Complainant's request that the Respondent provide documentation that established that it was the legal owner of the account was reasonable. The Complainant has a right to request documentation that establishes the validity of a debt. The identity of the account owner is necessary to establish the validity of a debt. The Respondent's validation of the account was insufficient because it did provide the proof of ownership documentation requested by the Complainant. The rules of the Board also prohibit a collection service from communicating with any person other than the consumer, the consumer's attorney, the creditor, the creditor's attorney, or a credit reporting agency without the prior consent of the consumer or the express permission of a court of competent jurisdiction. *See* Rules of the Tennessee Collection Service Board. 0320-05-.03(2)(a) (Communication in Connection with Debt Collection: Communication with Third Parties). The validation letter issued by the Respondent on July 23, 2025, contained personal information that was not related to the Complainant. The Respondent's issuance of the validation letter violated Rules of the Tennessee Collection Service Board. 0320-05-.03(2)(a). In regards to the debt dispute, the Board does not have jurisdiction over debt disputes i.e., disputed accounts regarding payment, sum balance, or terms.

**Recommendation: Consent Order with a $500.00 total civil penalty plus costs when necessary and authorization for formal hearing for violations Rules of the Tennessee Collection Service Board. 0320-05-.07(2) (Validation of Debts: Disputed Debts) ($250.00 civil penalty) and Rules of the Tennessee Collection Service Board. 0320-05-.03(2)(a) (Communication in Connection with Debt Collection: Communication with Third Parties) ($250.00 civil penalty).**

**BOARD DECISION: The Board accepted legal counsel's recommendation.**

**23. 2026001081**

**Respondent:**
**License Status: Active**
**First Licensed: 02/02/2024**
**License Expiration: 02/01/2028**
**Disciplinary History: None**

**Summary:** This complaint was referred to the Department from the Division of Consumer Affairs. The complaint alleges that the Respondent engaged in harassment by issuing 14 collection emails to the Complainant within a 10-day period. The Complainant received 14 emails from the Respondent between November 8, 2025, and November 17, 2025. The Complainant asserted that the Respondent's conduct violates the "7 in 7" rule of the Fair Debt Collection Practices Act (FDCPA). The "7 in 7" rule is a communication prohibition of the FDCPA that prevents a collection service from issuing more than 7 phone calls to a consumer within a 7-day period. *See* 12 CFR § 1006.14(b)(2). The Respondent filed a timely response to the complaint on January 26, 2026. The Respondent advised in their response that the "7 in 7" rule of the FDCPA only applies to phone calls, and their conduct did not violate the rule. The Board enforces the provisions of the Tennessee Collection Service Act and the rules of the promulgated thereunder. The Tennessee Collection Service Act and the rules of the Board do not contain a rule identical to the "7 in 7" rule of the FDCPA. However, the rules of the Board do prohibit collection service businesses from engaging in harassment or abuse. *See* Rules of the Tennessee Collection Service Board. 0320-05-.04(1) (Harassment or Abuse). Rules of the Tennessee Collection Service Board. 0320-05-.04(1)(e) states, in part, "Without limiting the general application of this prohibition, the following conduct is a violation of this section: causing a telephone to ring or engaging any person in telephone conversation repeatedly or continuously with intent to annoy, abuse, or harass any person at the dialed number." Although this provision does not relate directly to emails, it could be interpreted to apply generally to all collection communications. The Respondent's issuance of 14 emails to the Complainant within a 10-day period constitutes a repeated attempt to engage the consumer in conversation. The Respondent's conduct appears to constitute harassment pursuant to the regulatory intent of Rules of the Tennessee Collection Service Board. 0320-05-.04(1). Due to the absence of a rule of the Board that deals directly with issuance of emails and the Respondent's lack of discipline history, the issuance of a letter of warning regarding Rules of the Tennessee Collection Service Board. 0320-05-.04(1) (Harassment or Abuse) appears to be an appropriate resolution to this complaint.

**Recommendation: Letter of Warning regarding Rules of the Tennessee Collection Service Board. 0320-05-.04(1) (Harassment or Abuse).**

**BOARD DECISION: The Board accepted legal counsel's recommendation.**

**24. 2026001641**

**Respondent:**
**License Status: Active**
**First Licensed: 10/20/2021**
**License Expiration: 10/19/2027**
**Disciplinary History: 2024-LOW, 2024-LOW, 2024-LOW**

**Summary:** This complaint was referred to the Department from the Division of Consumer Affairs and involves the same Respondent as complaints #2025070181 and #2025071091. The complaint alleges that the Respondent reported a collection account on the Complainant's credit report without issuing an initial collection notice. The Complainant discovered that the Respondent reported a collection account on their credit report in January 2024. The Complainant attempted to contact the Respondent on multiple occasions to obtain information regarding the debt but was unable to do so. The Complainant filed this complaint due to his lack of knowledge regarding the debt and his inability to contact the Respondent. The Respondent filed a timely response to the complaint on January 28, 2026. The Respondent was retained as a third-party collection service by the creditor on December 1, 2023. The Respondent issued the initial collection notice to the Complainant on December 5, 2023. There is no record of the initial notice being returned to the Respondent. The Respondent advised that they previously received a debt dispute from the Complainant on February 5, 2024. The Respondent reported the account as disputed to the credit bureaus and issued a validation of debt to the Complainant on February 14, 2024. The Respondent placed the Complainant's account in a cease communication status in their system and issued a tradeline deletion request to the credit reporting agencies. The Respondent is also going to reissue validation documentation to the Complainant. The rules of the Board require that a collection service issue an initial collection notice to the consumer responsible for the debt. *See* Rules of the Tennessee Collection Service Board. 0320-05-.07(1) (Validation of Debts: Notice of Debt; Contents). If a consumer issues a written debt dispute or verification of debt request to a collection service within 30 days of receipt of the initial collection notice, the rules of the Board require that the collection service cease collection of the debt until they provide the consumer with validation documentation. *See* Rules of the Tennessee Collection Service Board. 0320-05-.07(2) (Validation of Debts: Disputed Debts). The Respondent issued an initial collection notice to the Complainant on December 5, 2023. Additionally, the Respondent reported the account as disputed, investigated the account, and issued a validation of debt in response to the Complainant's debt dispute in February 2024. pursuant to Rules of the Tennessee Collection Service Board. 0320-05-.07(2). The Respondent's conduct cited in the complaint complied with Rules of the Tennessee Collection Service Board. 0320-05-.07(1) and Rules of the Tennessee Collection Service Board. 0320-05-.07(2). There does not appear to be a violation of the Tennessee Collection Service Act or the rules of the Board promulgated thereunder.

**Recommendation: Close.**

**BOARD DECISION: The Board accepted legal counsel's recommendation.**

**25. 2026002011**
**Respondent:**
**License Status: Active**
**First Licensed: 05/04/2022**
**License Expiration: 05/03/2026**
**Disciplinary History: None**

**Summary:** This complaint was referred to the Department from the Division of Consumer Affairs. The complaint alleges that the Respondent used false or misleading representations in connection with the collection of a debt. On December 3, 2025, the Complainant returned a missed call from the Respondent. During the phone conversation, one of the Respondent's agents stated that the Respondent was going to send one of the Complainant's debts to the local court for prosecution. The Complainant was then transferred to another representative that disclosed the name of the creditor and verified the Complainant's identity. The second representative also stated that the Complainant's account was not going to be sent out for legal enforcement. Eventually, the Complainant was connected to a supervisor who reviewed the recording of the first conversation and offered to settle the Complainant's debt for $500. The Respondent filed a timely response to the complaint on January 27, 2026. The Respondent stated that they investigated the Complainant's allegations. The Respondent acknowledged the concerns raised by the Complainant and stated that the company takes compliance seriously. The Respondent also stated that they will make sure that the agent involved receives additional training. The Respondent placed the Complainant's account in a cease-and-desist status and advised no further action will be taken. The rules of the Board prohibit a collection service from using any false representation or deceptive means to collect or attempt to collect any debt. Rules of the Tennessee Collection Service Board. 0320-05-.05(1) (False or Misleading Representations). The agent's threat to take legal action without the intent to do so constitutes a false or misleading representation pursuant to Rules of the Tennessee Collection Service Board. 0320-05-.05(1)(e) (False or Misleading Representations: The threat to take any action that cannot legally be taken or that is not intended to be taken.).

**Recommendation: Consent Order with a $250.00 civil penalty plus costs when necessary and authorization for formal hearing for violation of Rules of the Tennessee Collection Service Board. 0320-05-.05(1)(e) (False or Misleading Representations).**

**BOARD DECISION: The Board accepted legal counsel's recommendation.**

**26. 2026003211**

**Respondent:**
**License Status: Active**
**First Licensed: 06/04/2003**
**License Expiration: 05/31/2027**
**Disciplinary History: 2009-Consent Order**

**Summary:** This complaint was referred to the Department from the Division of Consumer Affairs. The complaint involves a debt dispute. In March 2025, the Complainant discovered that the Respondent reported a collections account on their credit reports. The underlying debt is a residential lease. The Complainant's identity was stolen in 2024, and someone used the Complainant's identity information to enter into several residential lease across the state of Georgia. The Complainant alleged that the residential lease was entered into fraudulently, and they are not responsible for the debt. The Respondent filed a timely response to the complaint on January 29, 2026. The Respondent was retained by the creditor as a third-party collection service. The Respondent advised the creditor of the Complainant's debt dispute and the creditor performed an investigation on the Complainant's account. The Respondent stated that the creditor was not listed on the police reports provided by the Complainant, and they were never investigated as part of the identity theft. The Respondent attached validation documentation to their response and asked the Complainant to review them. If the Complainant believes that the residential lease was involved in the identity theft, the Respondent requested that the Complainant provide a copy of the police report, a completed and notarized identity theft affidavit, and a clear copy of their government issued identification. The allegations in the complaint constitute a debt dispute between the Complainant and the creditor. The Board does not have jurisdiction over debt disputes i.e., disputed accounts regarding payment, sum balance, or terms. There does not appear to be a violation of the Tennessee Collection Service Act or the rules of the Board promulgated thereunder.

**Recommendation: Close.**

**BOARD DECISION: The Board accepted legal counsel's recommendation.**

**27. 2025076681**

**Respondent:**
**License Status: App expired**
**First Licensed: n/a**
**License Expiration: n/a**
**Disciplinary History: None**

**Summary:** This complaint involves the same facts as complaint #2025076691. The complaint alleges that the Respondent operated as a collection service in Tennessee without a valid collection service license issued by the Board. The Complainant is a Tennessee resident. In December 2025, the Complainant discovered that there were two collection accounts reported on their credit report. The Respondent was identified as the creditor for the accounts. The account information was reported by a licensed collection service on behalf of the Respondent. The Complainant used the Department's website to conduct a license search on the Respondent. The Complainant discovered that the Respondent did not possess a valid Tennessee collection service license and filed this complaint. The Respondent did not file a response to the complaint. The Respondent is a company that purchases debts from other entities, and they use a licensed collection service to collect the purchased accounts. An entity that holds or acquires accounts, bills or other forms of indebtedness through purchase, assignment or otherwise; and only engages in collection activity through the use of a licensed collection agency or a licensed attorney is exempt from the Tennessee Collection Service Act. *See* Tenn. Code Ann. § 62-20-103(9) (Exemptions). The Respondent is exempt from the Tennessee Collection Service Act pursuant to Tenn. Code Ann. § 62-20-103(9), and the Board does not have jurisdiction over the Respondent's conduct.

**Recommendation: Close.**

**BOARD DECISION: The Board accepted legal counsel's recommendation.**

**28. 2026004901**

**Respondent:**
**License Status: Active**
**First Licensed: 11/23/2021**
**License Expiration: 11/22/2027**
**Disciplinary History: 2023-LOW**

**Summary:** This complaint was referred to the Department from the Division of Consumer Affairs and involves the same Respondent as complaints #2025076691 and #2026006591. The complaint alleges that the Respondent used false or misleading representations in connection with the collection of a debt. The Complainant stated that the Respondent reported a collections account on their credit report that was also being reported by a different collection agency. The Complainant asserted that both collection agencies cannot have the authority to report the same debt at the same time, and the duplicate collection accounts have caused a negative impact on their credit rating. The Complainant asserted that the Respondent's actions constitute false or misleading representations. The Respondent filed a timely response to the complaint on February 3, 2025. The Respondent advised that they are the master servicer for the current creditor. The Respondent stated that the Complainant's account has been properly verified and validation documentation was previously issued to the Complainant. The Respondent also attached the validation documentation to their complaint response. The Respondent asserted that they are legally entitled to report the credit information on behalf of the creditor, and all of the credit information reported to the credit reporting agencies was accurate. The rules of the Board prohibit a collection service from communicating or threatening to communicate to any person credit information that is known or should be known to be false, including the failure to communicate that a disputed debt is disputed. *See* Rules of the Tennessee Collection Service Board. 0320-05-.05(1)(h) (False or Misleading Representations). The Respondent verified the accuracy of the credit information reported to credit reporting agencies and provided the supporting validation documentation to the Complainant on several occasions. The Respondent's conduct cited in the complaint does not constitute a false or misleading representation. There does not appear to be a violation of the Tennessee Collection Service Act or the rules of the Board promulgated thereunder.

**Recommendation: Close.**

**BOARD DECISION: The Board accepted legal counsel's recommendation.**

**29. 2026006591**

**Respondent:**
**License Status: Active**
**First Licensed: 11/23/2021**
**License Expiration: 11/22/2027**
**Disciplinary History: 2023-LOW**

**Summary:** This complaint was referred to the Department from the Department of Financial Institutions and involves the same Respondent as complaints #2025076691 and #2026004901. The complaint alleges that the Respondent continued to engage in collection activity without providing the Complainant with an adequate validation of debt. In December 2025, the Complainant discovered that the Respondent reported a collections account on their credit report. The Complainant issued a written verification of debt request to the Respondent on December 13, 2025. The Complainant requested that the Respondent provide documentation that established the legal enforceability of the debt, proof of ownership of the account, and evidence of the Respondent's authority to collect. The Respondent's validation of debt response only included an account summary and a billing statement from 2020. On January 6, 2026, the Complainant issued a second verification of debt request to the Respondent. The second validation of debt response contained the same documentation as the first. The Respondent did not provide any documentation establishing the current ownership of the account or the Respondent's authority to collect. The Respondent continued to engage in collection activity despite the unresolved debt dispute.

The Complainant stated that the collection account has had a negative impact on their credit rating. The Respondent filed a timely response to the complaint on February 5, 2026. The Respondent was retained by the creditor as a third-party collection service. The Respondent advised that the current creditor purchased the Complainant's account from the original creditor on June 22, 2022. The Respondent attached billing statements covering September 2020 – January 2021 to their response. The Respondent asserted that they provided the Complainant with a proper validation of debt, and the credit information reported to the credit reporting agencies was accurate. If a consumer issues a written debt dispute or verification of debt request to a collection service within 30 days of receipt of the initial collection notice, the rules of the Board require that the collection service cease collection of the debt until they provide the consumer with validation documentation. *See* <u>Rules of the Tennessee Collection Service Board</u>. 0320-05-.07(2) (Validation of Debts: Disputed Debts). The Complainant identified specific items in their request for verification of the debt. The Respondent failed to provide documentation establishing proof of ownership and the Respondent's authority to collect on behalf of the creditor. It was reasonable for the Complainant to request this documentation as the account was allegedly sold by the original creditor. The Respondent's validation of debt was inadequate because it failed to provide all the documentation necessary to verify account's legitimacy. The Respondent violated <u>Rules of the Tennessee Collection Service Board</u>. 0320-05-.07(2) by continuing to engage in collection activity without first providing an adequate validation of debt to the Complainant.

**Recommendation: Consent Order with a $250.00 civil penalty plus costs when necessary and authorization for formal hearing for violation of <u>Rules of the Tennessee Collection Service Board</u>. 0320-05-.07(2) (Validation of Debts: Disputed Debts).**

**BOARD DECISION: The Board accepted legal counsel's recommendation.**

**30. 2026014341**
**Respondent:**
**License Status: Active**
**First Licensed: 04/09/2019**
**License Expiration: 04/08/2027**
**Disciplinary History: None**

**Summary:** This administrative complaint alleges that the Respondent's surety bond on file with the Board expired on October 28, 2025. After reviewing the Respondent's licensing file, the Executive Director for the Board emailed the Complainant to request an updated surety bond certificate on November 24, 2025, December 16, 2025, and February 3, 2026. The Executive Director for the Board did not receive a response from the Respondent and filed this complaint on March 2, 2026. The Respondent filed a timely response to the complaint on March 18, 2025. The Respondent apologized for the issue and advised that they had expected their vendor to submit this documentation to the Board. However, the documentation provided by the Respondent was a surety bond rider that only established that the Respondent's principal address changed on April 25, 2025. The documentation did not establish that the Respondent possessed an effective surety bond after October 28,

2025. During the review of the complaint, legal counsel for the Board emailed the Respondent and made an additional request for the Respondent's surety bond continuation certificate. At this time, the Respondent has not provided proof of an effective surety bond. The Tennessee Collection Service Act requires that all licensees post a surety bond with the Board, and the surety bond must remain in full force and effect during all periods and in all places in which the licensee is doing business within this state. *See* Tenn. Code Ann. § 62-20-110(a) (Bond; certificate of deposit). Based on the Respondent's failure to provide evidence of an effective surety bond, it appears that they are in violation of Tenn. Code Ann. § 62-20-110(a).

**Recommendation: Consent Order with a $250.00 civil penalty plus costs when necessary and authorization for formal hearing for violation of Tenn. Code Ann. § 62-20-110(a) (Bond; certificate of deposit).**

**BOARD DECISION: The Board decided to close the complaint based on the fact that the Respondent provided a copy of their surety bond continuation certificate on April 2, 2026. The surety bond continuation certificate was executed on July 30, 2025, which established that the Respondent's surety bond remained in full force and effect in Tennessee.**

**31. 2026005451**
**Respondent:**
**License Status: Active**
**First Licensed: 03/18/2021**
**License Expiration: 03/17/2027**
**Disciplinary History: None**

**Summary:** This complaint involves a debt dispute. The Complainant was contacted by the Respondent in January 2026 regarding the collection of a debt. The underlying debt is a $250 residential lease application fee. The Complainant claimed that the debt was invalid because they never agreed in writing to pay an application fee. The Respondent filed a timely response to the complaint on February 12, 2026. The Respondent was retained as a third-party collection service by the creditor in 2023. The Respondent advised that they conducted a comprehensive review of this matter, including an evaluation of the underlying account documentation provided by the creditor. After the review was conducted, the Respondent decided to close the Complainant's file and cease all future collection action. The Respondent also issued a tradeline deletion request to the credit reporting agencies. The Respondent's conduct in response to the Complainant's debt dispute complied with Rules of the Tennessee Collection Service Board. 0320-05-.07(2) (Validation of Debts: Disputed Debts), and the Board does not have jurisdiction over debt disputes i.e., disputed accounts regarding payment, sum balance, or terms. There does not appear to be a violation of the Tennessee Collection Service Act or the rules of the Board promulgated thereunder.

**Recommendation: Close.**

**BOARD DECISION: The Board accepted legal counsel's recommendation.**

**32. 2026005511**

**Respondent:**
**License Status: Active**
**First Licensed: 12/14/2006**
**License Expiration: 12/13/2026**
**Disciplinary History: 2011- Consent order. 2011- CO, 2011-CO, 2012-LOW, 2012-LOW, 2023-LOW, 2024-LOW, 2024-LOW, 2024-LOW, 2024-LOW, 2024-LOW**

**Summary:** This complaint was referred to the Department from the Division of Consumer Affairs. The complaint alleges that the Respondent harassed the Complainant in connection with the collection of a debt. The Complainant stated that they have received multiple collection calls from the Respondent every day since December 18, 2025. The Complainant asserted that the Respondent's conduct constituted harassment. The Respondent filed a timely response to the complaint on February 10, 2026. The Respondent stated that they conducted an investigation of their communication records with the Complainant, and they found no evidence supporting the Complainant's allegations. The Respondent also placed the Complainant's file in a cease communication status that will prevent the placement of future collection calls regarding the account. The Respondent asserted that their communications with the Complainant complied with all applicable laws and regulations. The rules of the Board prohibit a collection service from engaging in any conduct the natural consequence of which is to harass, oppress, or abuse any person in connection with the collection of a debt. *See* Rules of the Tennessee Collection Service Board. 0320-05-.04(1) (Harassment or Abuse). The Complainant did not provide any evidence to support their allegation that the Respondent called them multiple times a day. The Respondent denied the allegations in the complaint after investigating their communication records. Furthermore, the Respondent placed the Complainant's account in a status that will prevent the issuance of future collection calls. There is no evidence that the Respondent engaged in harassment or abuse in connection with Complainant's account. There does not appear to be a violation of the Tennessee Collection Service Act or the rules of the Board promulgated thereunder.

**Recommendation: Close.**

**BOARD DECISION: The Board accepted legal counsel's recommendation.**

## Collections Cases Re-presented:

**33. 2025028321**

**Respondent:**
**License Status: Unlicensed**
**First Licensed: n/a**
**License Expiration: n/a**
**Disciplinary History: None**

**Summary:** This complaint alleges that the Respondent operated as a collection service in Tennessee without a license and harassed the Complainant. The Complainant is a Tennessee resident. The Complainant received two collection calls from the Respondent in May 2025. After receiving the collection calls, the Complainant researched the Respondent and discovered that the Respondent did not hold a Tennessee collection service license. The Complainant also discovered that the Respondent was involved in litigation in Idaho for operating as an unlicensed collection service in that state. The Respondent did not respond to the complaint. Legal counsel for the Board searched the Board's licensing records and verified that the Respondent does not possess a Tennessee collection service license. The Tennessee Collection Service Act states that no person shall commence, conduct, or operate a collection service business in Tennessee without a valid license issued by the Board. *See* Tenn. Code Ann. § 62-20-105(a) (Licenses). The Respondent violated Tenn. Code Ann. § 62-20-105(a) by attempting to collect a debt from a Tennessee resident.

**Recommendation: Consent Order with a $500.00 civil penalty plus costs when necessary and authorization for formal hearing for violation of Tenn. Code Ann. § 62-20-105(a) (Licenses).**

**BOARD DECISION: The Board accepted legal counsel's recommendation.**

**New Information:** This complaint was presented to the Board at the meeting conducted on July 9, 2025. A consent order was issued to the Respondent on August 1, 2025. The Respondent did not issue a response to the consent order. A Notice of Hearing and Charges was filed against the Respondent on October 24, 2025. The Respondent did not appear at the Prehearing Conference conducted on December 1, 2025, and all of the certified mail issued to the Respondent was returned undeliverable. The formal case against the Respondent was voluntarily dismissed on March 23, 2026, due to concerns regarding ineffective service of process. The Respondent is located in California and does not have a registered agent filed with the California Secretary of State. Additionally, the executive officers of the Respondent are not identified online or on the Respondent's website. Service of Process for an out-of-state partnership or unincorporated association requires that copies of the summons and complaint are delivered to partner or managing agent of the company. Service of Process can also be effectuated if copies of the summons and complaint are delivered to a registered agent of the company. Legal counsel for the Board also contacted the Complainant for update on this matter. The Complainant advised that the collection calls ceased after the complaint was filed and they have no additional information regarding the Respondent. Due to these reasons, it appears that the best resolution is to close this complaint and flag the Respondent in the Board's records.

**New Recommendation: Close and flag.**

**New BOARD DECISION: The Board decided to close, flag and refer the complaint to the California Attorney General's office due to the verbal recommendation made by legal counsel during the board meeting.**

**34. 2025022121**
**Respondent:**
**License Status: Unlicensed**
**First Licensed: n/a**
**License Expiration: n/a**
**Disciplinary History: None**

**Summary:** This complaint involves a debt dispute and unlicensed activity. The Complainant is a transportation company located in another state. The Complainant received a collection letter from the Respondent on March 21, 2025, regarding a parking ticket for $1,020.00. The Complainant disputed the debt after receiving the collection letter. Then the Complainant received a second collection letter from the Respondent on April 11, 2025, with a new balance of $3,500.00. The Board does not have jurisdiction over debt disputes i.e., disputed accounts regarding payment, sum balance, or terms. The Respondent appears to be a collection service located in Tennessee. During the review of the complaint, legal counsel for the Board searched the Board's licensing records to determine if the Respondent possessed a Tennessee collection service license. Legal counsel for the Board discovered that the Respondent does not possess a Tennessee collection service license. The Tennessee Collection Service Act states that no person shall commence, conduct, or operate a collection service business in Tennessee without a valid license issued by the Board. *See* Tenn. Code Ann. § 62-20-105(a) (Licenses). The Respondent violated Tenn. Code Ann. § 62-20-105(a) by operating a collection service located in Tennessee without a collection service license issued by the Board.

**Recommendation: Consent Order with a $500.00 civil penalty plus costs when necessary and authorization for formal hearing for violation of Tenn. Code Ann. § 62-20-105(a) (Licenses).**

**BOARD DECISION: The Board accepted legal counsel's recommendation.**

**New Information:** This complaint was presented to the Board at the meeting conducted on July 9, 2025. A consent order was issued to the Respondent on August 1, 2025. The Respondent did not issue a response to the consent order. A Notice of Hearing and Charges was filed against the Respondent on October 13, 2025. The Respondent did not appear at the Prehearing Conference conducted on October 30, 2025, and all of the certified mail issued to the Respondent was returned undeliverable. The formal case against the Respondent was voluntarily dismissed on December 23, 2025, due to concerns regarding ineffective service of process. Based on new information regarding an officer of the Respondent, a second Notice of Hearing and Charges was filed against the Respondent on February 18, 2026. A Prehearing Conference was conducted on March 30, 2026, and once again, the Respondent did not appear. The second case was dismissed on March 30, 2026, due to concerns regarding service of process. Service of Process for a Tennessee partnership or unincorporated association requires that copies of the summons and complaint are delivered to partner or managing agent of the company. Service of Process can also be effectuated if copies of the summons and complaint are delivered to a registered agent of the company. The Respondent does not have a business filing with the

Tennessee Secretary of State and does not maintain a website. Additionally, the executive officers of the Respondent are not identified. Due to these reasons, it appears that the best resolution is to close this complaint and flag the Respondent in the Board's records.

**New Recommendation: Close and flag.**

**New BOARD DECISION: The Board decided to close, flag and refer the complaint to the Division of Consumer Affairs in the Tennessee Attorney General's office due to the verbal recommendation made by legal counsel during the board meeting.**