

Collection Agency Board Meeting

Tab 1 Call to Order

December 8, 2014

9:00 AM

Department of Licensing
Olympia, WA



STATE OF WASHINGTON
DEPARTMENT OF LICENSING

PO Box 9027 • Olympia, Washington 98507-9027

**COLLECTION AGENCY BOARD
MEETING AGENDA**

DATE: December 8, 2014

TIME: 9:00 a.m.

LOCATION: Department of Licensing
405 Black Lake Blvd SW
2nd Floor, Conference Room 2209
Olympia, WA 98502

BOARD MEMBER ORIENTATION (9:00 AM – 10:00 AM)

BUSINESS MEETING (10:00 AM)

1. Call to Order

- 1.1. Introductions
 - 1.1.1. New Board Members And Staff
- 1.2. Order Of Agenda
- 1.3. Approval Of Minutes: April 21, 2014
- 1.4. Review Communications

2. Public Comment Opportunity

3. New Business

- 3.1. Complaint Process Overview And Recommendations
- 3.2. Board Delegations
 - 3.2.1. URBP Delegation
- 3.3. 2015 Meeting Schedule
 - 3.3.1. Regulatory Board Section Calendar

4. Old Business

5. Complaint Cases for Review*

- 5.1. Staff Recommendations For Board Action

6. Legal Issues for Deliberation*

- 6.1. Orders To Be Presented

7. Disciplinary & Investigation Items

- 7.1. Closed Session Deliberation report (*only necessary if closed session is held*)
- 7.2. Disciplinary Cases Report

8. Assistant Attorney General's Report

9. Board Administrator's Report

9.1. Program Operations

9.1.1. Legislative Updates

9.1.2. Licensing and application update

9.2. Department Of Licensing

9.3. Other Items

10. Other Business

10.1 Action Items From This Meeting

10.2 Agenda Items For Next Meeting

11. Adjournment

*The Board may enter into closed session to discuss disciplinary proceedings.



STATE OF WASHINGTON
DEPARTMENT OF LICENSING

PO Box 9027 • Olympia, Washington 98507-9027

**COLLECTION AGENCY BOARD
MEETING MINUTES
SPECIAL BOARD MEETING**

DATE: April 21, 2014

TIME: 10:00 a.m.

LOCATION: Department of Licensing
405 Black Lake Blvd. SW
1st Floor, Conference Room 2105
Olympia, WA 98502

Members

Present: Craig Pridemore, Chair
Richard L. Marker, Public Member
Scott Wiswall, Licensee Member

Staff

Present: Derek Goudriaan, Program Manager
Robert Fuller, Program Administrator
David Browne, Program Assistant Administrator
Chris Doland, Program staff
Elizabeth Lagerberg, Assistant Attorney General to the Board
Kathleen Drew, Department of Licensing
David Walker, Department of Licensing
Lorin Doyle, Department of Licensing
Richard Storvick, Department of Licensing

Public

Present: David Grimm, Public

1. Call to Order 10:04 a.m.

1.1 Introductions

1.2 Approval of Agenda: Derek Goudriaan moved to amend the agenda, 2.2 to also include an update on the status of HB 1822 implementation. Agreed.

1.3 Approval of Minutes, June 6, 2013 meeting.

MOTION: A motion to accept was moved and seconded. The meeting minutes are approved.

2. NEW BUSINESS

2.1 Changes in board and staff members.

Craig Pridemore has assumed responsibilities as the Collection Agency Board Chair from previous chair, Robert Fuller. Scott Wiswall has been re-appointed to the board for an additional four years. Fred Corbitt has resigned his position on the board. Margaret Vogeli retired as Collection Agency program manager, and was replaced by Derek Goudriaan. Kathleen Drew, Assistant Director, updated the board on upcoming program staff changes. The Collection Agency program will be moved to the Design Funeral and Cemeteries Section effective June 1, 2014. Introduction of Design Funeral and Cemeteries Section staff Lorin Doyle, Administrator, and Rick Storvick, Assistant Administrator. Lorin Doyle gave an overview of her section.

2.2 Program update on cases, complaints, disciplinary actions, and HB 1822 implementation.

Derek Goudriaan provided the board with an update about the implementation of HB 1822, and the licensing of debt buyers. Since October 1st, 2013, the department has licensed approximately 100 debt buyers. Program staff anticipate applications will continue to trickle in.

Program staff completed 72 complaint cases in 2013. Two collection agency cases resulted in disciplinary action. There were three collection agencies who had two or more complaint cases.

It was proposed that future complaint and disciplinary case updates differentiate between third-party collection agencies and debt buyers. Derek Goudriaan stated future updates will be broken out in this way.

Discussion followed.

2.3 Review Time, Place and Manner Rule Proposal

Derek Goudriaan provided the board with an update regarding the public hearing in August of 2013 regarding proposed rule-making. The department received considerable input from the industry. In light of the feedback and the intent of the rule-making, the proposed rules were re-drafted to address only audits. Future, separate rule-making will be completed to address other concerns regarding rules outside the scope of time, place, and manner.

Derek Goudriaan walked the board through specific input that was received from Richard Marker, and the Washington Collectors Association.

A discussion was had regarding the initiation of a complaint case. Counsel advised the board that it has the authority to initiate investigations and cases. Counsel advised the board that they can delegate authority for investigations and enforcement to the Administrator.

Discussion followed with program staff, board members, and counsel analyzing and making recommendations regarding input that was received.

2.4 Public Questions

How does the Collection Agency program currently handle cases in which a complaint has not been received?

The program has not had any scenarios where a complaint was not first received.

The Washington Collectors Association requests the board initiate a full review of the Collection Agency rules.

The board will conduct a full review of the rules after completing rule-making for time, place, and manner.

Is there a timeframe for replacing Araceli Lamb's seat on the board?

The board has not received notice that Ms. Lamb has resigned her seat on the board, and is considered an active member of the board. Richard Marker will not be seeking re-appointment to the board at the expiration of his term at the end of the year. He is willing to attend in a temporary capacity if needed to establish a quorum.

3. Other Business

3.1 **Action Items** from this Meeting

MOTION: A motion to assign interim delegation of authority to the Administrator for the purpose of administering statutes was moved and seconded. The interim delegation of authority is assigned.

Prepare delegation of authority to the Administrator for board approval.

Program staff will complete a draft of proposed rules for time, place, and manner, and submit to counsel and associations for review.

Program staff will schedule a conference call with the board and counsel to review and approve any proposed rules prior to submitting to associations for review, and ultimately the filing of a CR-102.

Administrator Robert Fuller will attend the Washington Collectors Association conference in May 2014 to discuss due process, and the structure of the Collection Agency program and board.

Check with Governor's office on board appointments and vacancies.

Next meeting will be scheduled for June or July. Board will continue to meet twice a year, with teleconferences in between meetings as needed.

4. Adjournment

The meeting was adjourned at 11:23 am.

Submitted by: _____ Date _____ Approved By: _____ Date _____

Washington State Collection Agency Board
December 8, 2014
Olympia, WA

Review Communications – No Action Required

Recommendation: No action needed.

Submitted by Board Staff
December 8, 2014

Board Meeting

Tab 2

Public Comment

The board has the option to allow comment from the public on agenda items or other topics, unless the comment is related to an open investigation.

The board may limit the comment period, and will provide instructions if it chooses to do so.

Board Meeting

Tab 3

New Business

Topics for action or discussion by the board that were identified at or since the last board meeting.

Washington State Collection Agency Board
 December 8, 2014
 Olympia, WA

Open Complaints and Recommendations for Future Complaint Management and Resolution

Background: The Collection Agency Board historically delegated complaint resolution to staff, but the changes in board members and board staff require those delegations be updated (see separate agenda item).

To help the board understand the scope of complaints, staff has grouped the complaints by allegation and identified possible resolution options:

Alleged violations that can be established or disproved through paperwork review:

Harassment: There are currently 12 open cases that claim excessive calling/harassment by the collection agency. This includes calling multiple times a day, calling before 8 am and after 9 pm and calling place of employment after being asked not to.

Proposed resolution with proper delegation:

Determine whether there is sufficient evidence of unprofessional conduct by reviewing phone logs from the collection agency.

- If sufficient evidence (i.e. phone logs show harassment activity); staff will issue a statement of charges and pursue disciplinary action with a sanction amount set by the board.
- If there is no evidence of a violation, board staff can administratively close the case.

Failure to provide itemized statement/validation: There are currently 12 open cases that claim an itemized statement was not sent to the debtor showing validity to the debt.

Proposed resolution with proper delegation:

If the first notice was not provided to the debtor or if notice provided was not in compliance with RCW 19.16.250(8), staff will investigate by requesting evidence of mailing (copy of the letter, computer notes of the account activity etc).

- If the collection agency is able to supply evidence of the mailing, staff will administratively close the complaint.
- If there is no evidence that the first notice was mailed out or if it was mailed with incorrect content, staff will issue a statement of charges and pursue disciplinary action.
- If the first notice was provided to the debtor and a detailed itemization of the debt was then requested, staff will administratively close the case and forward to the Attorney General's Office due to violation being of Fair Debt Collections Practice Act (FDCPA). The Attorney General's Office is the authority having jurisdiction under the FDCPA.

Attempting to collect a debt that has already been paid: There are currently 5 open cases that claim debts have been paid but collection agencies are continuing to attempt to collect the debt.

Proposed resolution with proper delegation:

Staff will investigate by requesting evidence the debt was paid by the complainant (receipt, paid in full letter etc).

- If there is no evidence that the debt was paid provided by the complainant, board staff will administratively close the case for lack of evidence.
- If evidence is provided, the collection agency would be notified and required to report the debt as paid in full in their records and to the appropriate bureaus. Once that is completed, board staff would administratively close the case because the collection agency voluntarily complied.
- If the collection agency fails to show the debt as paid in full within 45 days (WAC 308-29-080), staff will issue a statement of charges and pursue disciplinary action.

Unlicensed Activity: There are currently 10 open cases claiming unlicensed activity.

Proposed resolution with proper delegation:

Board staff will investigate by researching the Department of Revenue's Business Licensing database to determine whether the business is licensed as a collection agency in Washington State.

- If the business is not licensed, board staff will contact it to explain the requirements to become licensed in Washington State and provide a deadline for the business to become licensed as a collection agency.
- If the business fails to become licensed by the deadline, staff will issue a statement of charges and pursue disciplinary action.

Certain types of complaints require the industry expertise of a board case manager

There are currently 4 cases that require case manager review. These cases include judgment being obtained without proper process service, garnishment was more than 50% of paycheck/bank account, excessive interest and/or fees applied to accounts and giving information to a third party.

Proposed resolution: the board case manager works with staff to guide investigation, to determine either charging details or to provide a recommendation for closure.

Recommendation: Staff requests the board make formal delegations to staff and to accept staff's recommendations for resolving the types of complaints listed above. Staff also requests that board members commit to act as reviewing case managers and work with staff to develop a range of appropriate sanctions for charging documents on those cases that require industry expertise.

Submitted by Board Staff
November 21, 2014

Washington State Collection Agency Board
 December 8, 2014
 Olympia, WA

Collection Agency Delegations

Background: The statutes and rules governing collection agencies identify specific authorities of the board and of the director. Depending on the nature of the authority, it may be delegated to staff. For example, within the Department of Licensing, other regulatory boards have delegated to staff the authority to investigate complaints, to issue or withdraw statements of charges and to conduct Brief Adjudicative Proceedings.

The table below outlines a very general summary of the authorities in the Collection Agency law (RCW 19.16) and rule (WAC 308-08; WAC 308-29):

Board authority	Director Authority
<ul style="list-style-type: none"> • Adopt, amend or rescind rules (19.16.351; 19.16.410) • Make inquiries and recommendations about the regulation of the industry to the director (19.16.351) • Disciplinary authority under 18.235.030 (19.16.351), which includes (in part) <ul style="list-style-type: none"> ○ Rule making to set standards of professional conduct and practice ○ Investigating complaints ○ Ordering summary suspensions or other restrictions on a licensee’s practice ○ Appointing a presiding officer to conduct hearings ○ Grant or deny license applications ○ Designate individuals to sign subpoenas and statements or charges • Determine when Brief Adjudicative Proceedings (BAP) can be used, conduct or delegate authority to conduct BAPs, and receive BAP appeals (308-29-090; 308-29-110; 308-29-120; 308-29-130) • Consider requests for administrative review of BAPS 	<ul style="list-style-type: none"> • Prescribe application form & content (19.16.130; 19.16.160) • Set licensing fees, late penalties (19.16.140; 19.16.150) • Accept applications & grant licenses (19.16.110; 19.16.150; 19.16.170) • Set licensing requirements (19.16.120; 19.16.130; 19.16.160; 19.16.180; 308-29-020; 308-29-030; 308-29-060) • Suspend or terminate licenses for specific reasons; reinstate them upon proof of compliance (19.16.120; 19.16.190) • Inspect licensee records (308-29-025) • Maintain specific records (19.16.190; 19.16.200; 19.16.340; 19.16.420) • Act as an out-of-state licensee’s agent for receipt of services of process (19.16.390).

Recommendation: Board staff requests the board delegate specific authorities to staff, as outlined in the following document, with the intent to expedite complaint resolution for those complaints that fall below a threshold identified by the board. The board retains authority over complaints that require industry expertise to guide investigation, to determine either charging details or to provide a recommendation for closure.

Submitted by Board Staff
 November 13, 2014



STATE OF WASHINGTON
DEPARTMENT OF LICENSING
 PO Box 9020 • Olympia, Washington 98507-9020

Delegation of Disciplinary Authority by
THE WASHINGTON STATE COLLECTION AGENCY BOARD
 to
LORIN DOYLE

I, _____, Chair of the Washington State Collections Agency Board (the Board), acting under the authority of a majority affirmative vote of the Board, do hereby delegate to **LORIN DOYLE**, in her capacity as an Administrator with the Business and Professions Division of the Department of Licensing, the power to take the following actions, initially granted to the Board by Chapter 18.235 RCW (the Uniform Regulation of Business and Professions Act), with respect to any entity licensed or required to be licensed pursuant to Chapter 19.16 RCW (Collection Agencies):

- (a) Investigate complaints or reports of unprofessional conduct, including allegations regarding the practice of regulated businesses, professions or occupations without the required license.
- (b) Conduct examinations of records required by WAC 308-29-025 to be located at a licensee's place of business.
- (c) Take or cause depositions to be taken and use other discovery procedures, including the issuance of subpoenas to compel the production of documents, as needed in an investigation.
- (d) Determine whether there is sufficient evidence to find that a licensee, or entity required to be licensed, has engaged in unprofessional conduct; and such evidence is deemed to be:
 - (1) **insufficient**, to administratively close the case.
 - (2) **sufficient**, and the proposed sanction is limited to only a fine of \$2500 or less per violation, to initiate procedures under paragraphs (e) and (f) of this delegation. This authority is restricted to only those cases where the licensee, or entity required to be licensed, has been found to have:
 - i. made excessive calls or otherwise harassed a debtor in violation of RCW 19.16.250(13) and/or (18);
 - ii. given, sent, or caused to be given or sent to any debtor, any notice not in compliance with RCW 19.16.250(8)
 - iii. collected, or attempted to collect, sums from a debtor in excess of those authorized under RCW 19.16.250(21);
 - iv. failed to timely obtain or renew a collection agency license.
 - (3) **sufficient**, and does not fall within the scope of paragraph (d)(2), above, to recommend to the Board, or the Board's designee(s), that disciplinary action be commenced against the licensee or entity required to be licensed.

- (e) Initially determine whether, if challenged or appealed, a statement of charges or notice of intent should be adjudicated under the Administrative Act:
 - (1) **formally**, where a hearing is conducted by the Board, a committee of the Board, or an Administrative Law Judge; or
 - (2) **informally**, where a proceeding is conducted by a Brief Adjudicative Process Presiding Officer.
- (f) Personally notify, or designate program employee(s) to notify, persons licensed, or required to be licensed, when the Board, or the Administrator, acting under the delegated authority of the Board, is proposing to:
 - (1) impose any sanction(s) authorized by RCW 18.235.110(1); or
 - (2) order the person to cease and desist in any regulated activity, as authorized by RCW 18.235.150.
- (g) Receive, initiate, consider, negotiate, and reject or accept offers of settlement in any case initiated in accordance with paragraph (d)(2) of this delegation.
- (h) Withdraw:
 - (1) subpoenas issued under paragraph (c) of this delegation;
 - (2) notifications issued under paragraph (f) of this delegation;
 - (3) offers of settlement considered under paragraph (g) of this delegation.

For the purposes of this delegation, a “license” is as defined in RCW 34.05.010(9) and RCW 18.235.010(6). In addition, this delegation:

- is made by authority of and pursuant to RCW 18.235.030 and .040; and in accordance with Chapter 19.16. RCW (Collection Agencies); and Chapter 34.05 (the Administrative Procedures Act).
- does not include the authority to:
 - delegate further any power listed above, without the prior written permission of the Board Chair; or
 - to divulge, or authorize any other person to divulge, to any person (a) not associated with the Board; or (b) not employed by the department any privileged legal advice provided by any assistant attorney general to any member of the Board or any department employee. The authority to waive the attorney-client privilege with respect to such privileged communications is strictly limited to only the Board Chair and Director or Deputy Director of the department.
- shall remain in effect until otherwise amended, revoked or withdrawn; shall not be deemed exclusive; and shall not apply to an acting or interim Administrator. This delegation supersedes any previous delegations issued.

DATED this _____ day of _____, 2014.

Tami Dohrman, Chair
Washington State Collection Agency Board

Washington State Collections Agency Board
December 8, 2014
Olympia, WA

Background: The Collection Agency Board has historically met up to twice a year.

Board staff recommends meeting in March and again in early September, to prepare for the annual meeting of the North American Collection Agency Regulatory Association, tentatively scheduled for late September-early October 2015.

The Regulatory Boards Section calendar follows this cover sheet for reference.

Recommendation: Board staff requests the board members bring their 2015 calendars to the board meeting.

Submitted by Board Staff
November 10, 2014

Regulatory Boards Section 2015 Calendar

DRAFT

DRAFT

DRAFT

DRAFT

January 2015						
S	M	T	W	T	F	S
				1	2	3
4	5	6	7	8	9	10
11	12	13	14	15	16	17
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25	26	27	28	29	30	31

February 2015						
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March 2015						
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29	30	31				

April 2015						
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May 2015						
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24	25	26	27	28	29	30
31						

June 2015						
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28	29	30				

July 2015						
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August 2015						
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23	24	25	26	27	28	29
30	31					

September 2015						
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27	28	29	30			

October 2015						
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November 2015						
S	M	T	W	T	F	S
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29	30					

December 2015						
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20	21	22	23	24	25	26
27	28	29	30	31		

January 23	Architect Board meeting (Olympia)
January 23	LA Board meeting (Olympia)
January 28-29	Engineers Board meeting
February 3	Funeral & Cemetery Board meeting (Olympia)
February 24 - 26	ICFSEB annual meeting (Dallas, TX)
March	Geologist Board meeting
March 13 - 14	NCARB Regional Summit (TBD)
March	Collection Agency Board meeting
March 18-19	Engineers Board meeting
April 10 - 11	ASBOG COE (Tampa, FL)
April 14 - 16	WA Hydrogeology Symposium (Tacoma)
April 17	LA Board meeting (UW, Seattle)
April 24	Architect Board meeting (UW, Seattle)
May 5	Funeral & Cemetery Board meeting (Olympia)
June	Geologist Board meeting
June 17 - 20	NCARB annual meeting, New Orleans, LA
June 17-18	Engineers Board meeting
July 17	Architect Board meeting (Olympia)
July 24	LA Board meeting (Olympia)
August 4	Funeral & Cemetery Board meeting (Olympia)
August 19-20	Engineers Board meeting
September	Geologist Board meeting
September	Collection Agency Board meeting
September	DCRA annual meeting
September 16-19	CLARB Annual meeting (Louisiana)
September	NACARA annual meeting
October	Engineers Board meeting
October 15	Architect Board meeting (WSU, Pullman)
October 16 or 23	LA Board meeting (TBD in April 2015, WSU)
November 3	Funeral & Cemetery Board meeting
November 11 - 14	ASBOG COE & Annual meeting (Wilmington, DE)
December	Geologist Board meeting
December	Engineers Board meeting

Geologist Architect Funeral & Cem Landscape Collection Agencies Engineers (tent)

Conference dates include travel days.



State Holidays:	Jan 1 & 19	Feb 16	May 25	July 4
	Sept 7	Nov 11, 26-27	Dec 25	

Board Meeting

Tab 4

Old Business

Topics from past meetings, presented for update, action or further discussion by the board.

Board Meeting

Tab 5

Complaint Cases for Review

Complaint closure recommendations
presented by the assigned case manager.

Board action is required on each case.

Washington State Collection Agency Board
December 8, 2014
Olympia, WA

Complaint Cases for Review

Staff Recommendations For Board Action – None

Recommendation: No action needed.

Submitted by Board Staff
December 8, 2014

Board Meeting

Tab 6

Legal Issues for Deliberation

Negotiated settlement orders or default orders presented by the board's prosecution team.

Board action is required on each order.

Board Meeting

Tab 7

Disciplinary & Investigation Reports

Standard disciplinary reports and a list of any administratively-closed complaints.

Provided for information only – typically no board action is needed.

Board Meeting

Tab 8

Assistant Attorney General's Report

Presentation of general legal issues
of interest to the board.

Provided for information only –
typically no board action is needed

Board Meeting

Tab ;

Board Administrator's Report

Operational reports and information
about legislative matters of interest to the board.

Provided for information only –
typically no board action is needed.

Washington State Collection Agency Board
 Olympia, WA
 December 8, 2014

New Licensees:

Total: 80

4 Star Resolution	Fair Financial Corp	Provodis Mortgage LIC
Accelerated Inventory	Fb Credit Services LLC	Receivables Outsourcing INC
Account Recovery Services, Inc.	First national Collection Bureau	Receivables Outsourcing INC
ACQUIRED ASSETS LTD	GATESTONE CO INTERNATIONAL	RevMD Partners, LLC
AMERICAN NEIGHBORHOOD	Genpact LLC	Richard Brees
BCA Financial Services, Inc	Global Recovery Group, Inc.	Rocky Mountain Recovery Group
BCA Financial Services, Inc	Global Recovery Solutions, Inc.	SCOTT LOWERY LAW OFFICE
Bifulco and Associates prof corp.	Goldman Sachs Mortgage Company	Secure Capital Management INC
Bridgespire Financial Services, Inc	Gotham Collection Services Corp	SIGNATURE PERFORMANCE TIB LLC
Bridgespire Financial Services, Inc	Gregory Funding LLC	SKO Brenner American, Inc.
C2 ACQUISITIONS, LLC (DB)	JTM Capital Management	Snohomish County Process Servers
Capital Financial Credit, LLC(DB)	Judgment Recovery Of WA	Synerprise Consulting Services, Inc.
Center One Financial Services	Kyanite Services Inc	THE CBE GROUP
Central Credit Services, LLC	Kyanite Services Inc	The Murkin Group LLC
Central Research Inc	LOANCARE LLC	TORRES CREDIT SERVICES INC
CENTRAL RESEARCH INC	MTGLQ investors L.P	United Adjustment Services inc
CHMI SOLUTIONS INC	Nationwide Financial Group, Inc.	United Collection Bureau, Inc.
CITATION COLLECTION SERVICES LLC	Netcollections LLC	United Debt Holding, LLC (DB)
CLIENT CARE GROUP LLC	Open Assets LLC DB	Universal Systems
COMPLETE CREDIT SOLUTIONS (DB)	ORIONAS MANAGEMENT GROUP	VION RECEIVABLE INVESTMENTS DB
Consolidated Management Group LLC	Pendrick Capital Partners II, LLC (DB)	Walled Lake Credit Bureau, LLC
Credence Resource Man	Phoenix Financial Services LLC	Walled Lake Credit Bureau, LLC
Credit Bureau of Napa County	PRECISE COLLECTIONS LLC	WEINSTEIN Karp & Associates inc
D2 Management	Premier Management Bureau	Westhill Exchange LLC
DEBT MANAGEMENT PARTNERS	Premiere Credit of north America	WORLD CREDIT FUND III LLC
ELITE ENTERPRISE SERVICES LLC (db)	Provodis Mortgage LIC	WORLD OMNI FINANCIAL CORP
Empire Credit Services, LLC	Provodis Mortgage LIC	

Recommendation: For information only; no action required.

Submitted by Board Staff:

October 30, 2014

Board Meeting

Tab 10

Other Business

Review of action items from this meeting, agenda items for the next meeting, and discussion of topics added under the Order of the Agenda.

Washington State Collection Agency Board
December 8, 2014
Olympia, WA

Other Business

Action Items From This Meeting

Recommendation: No action needed.

Submitted by Board Staff
December 8, 2014

Washington State Collection Agency Board
December 8, 2014
Olympia, WA

Other Business

Agenda Items For Next Meeting

Recommendation: No action needed.

Submitted by Board Staff
December 8, 2014

Board Meeting

Tab 11

Adjournment