



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

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FEB 28 2025
AGO
General Services HLB

February 24, 2025

Nick Brown
Attorney General
PO Box 40100
Olympia, Washington 98504-0100

Dear Attorney General Brown,

In 2018, after lengthy task force discussions, the Collection Agency Board directed the Department of Licensing (DOL) to enforce all regulations within the Collection Agency Act, including those that contain the word "claim," against any licensee. Specifically, this was intended to address collection of "legal financial obligations" (LFO's) and other public debts. This direction was provided in a split Board decision. The Board has received requests from interested members to revisit this decision, citing two recent federal court cases, *Calderon v. Dynamic Collectors, Inc.* and *Syria v. AllianceOne Receivables Mgmt.*

Board staff understands from initial discussions with your office that there is broad public interest in this topic with wide-ranging consumer impacts. In recognition of those impacts and the associated risks for all interested parties, the Board is seeking an independent formal legal opinion from your office on whether all regulations in the Collection Agency Act are enforceable against licensees that are collecting public debts under RCW 19.16.500.

Sincerely,

Fred Wade

Fred Wade, Chair
Washington State Collection Agency Board
Washington State Department of Licensing
Business and Professions Division

Enclosure

cc: Rebecca Kim, Advising Assistant Attorney General
Sydney Muhle, Program Specialist, Washington State Collection Agency Board