

From: Greg Overstreet [<mailto:greg.overstreet@Moneytreeinc.com>]
Sent: Friday, September 19, 2014 11:16 AM
To: Mele-Hetter, Catherine (DFI)
Cc: Trent Matson
Subject: RE: Proposed Lead Generator Rule Input

Catherine:

It occurred to me that one aspect of the proposed lead generator regulation might have an unintended consequence to licensed payday lenders. Proposed WAC 208-630-110 defines "small loan agent services" to include: "(3) Collecting small loans." I think this would require any entity collecting payday loans to obtain one of the new licenses.

This would include Moneytree's third-party collection firm in Ohio. Of course, Moneytree's collection activities are supervised by DFI and the CFPB; our third-party collector is also supervised by the CFPB (and, presumably, Ohio regulators) so our collectors are already well regulated.

Could the definition of "small loan agent services" be amended so that a collector in a contractual relationship with a license holding a small loan endorsement is not included in the definition (and therefore not subject to the new license)? The language would look like this: "(3) Collecting small loans, except if the person or entity is collecting loans originated by a person or entity holding a small loan endorsement."

What do you think?

Greg