
IN THE MATTER OF:

ZIONS DEBT HOLDINGS, LLC
NMLS # 1906874
(“Zions”)

CHRISTOPHER THAYNE CARTER
NMLS # 1888989
(“Carter”)

BRIAN SCOTT FULLER
NMLS # 1887837
(“Fuller”)

(collectively, “Respondents”)

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**TEMPORARY ORDER TO
CEASE AND DESIST**

ORDER TO MAKE RESTITUTION

**NOTICE OF INTENT TO ISSUE
ORDER TO CEASE AND DESIST**

**NOTICE OF INTENT TO IMPOSE
CIVIL PENALTY**

AND

NOTICE OF RIGHT TO HEARING

I. LEGAL AUTHORITY AND JURISDICTION

1. The Banking Commissioner (“Commissioner”) is charged with the administration of Part XII of Chapter 669, Sections 36a-800 to 36a-814, inclusive, of the Connecticut General Statutes, “Consumer Collection Agencies”, and the regulations promulgated thereunder, Sections 36a-809-6 to 36a-809-17, inclusive, of the Regulations of Connecticut State Agencies (“Regulations”).

2. Pursuant to the authority granted by Section 36a-17 of the Connecticut General Statutes, the Commissioner, through the Consumer Credit Division of the Department of Banking (“Department”), has investigated the activities of Respondents to determine if they have violated, are violating or are about to violate the provisions of the Connecticut General Statutes or the Regulations within the jurisdiction of the Commissioner (“Investigation”).

3. As a result of the Investigation, the Commissioner has reason to believe that Zions has violated Sections 36a-801(a) and 36a-805(a)(16) of the Connecticut General Statutes, Section 36a-809-10 of the

Regulations, subdivision (10) of Section 36a-809-11 of the Regulations, and orders issued by the Commissioner.

4. As a result of the Investigation, the Commissioner has reason to believe that Carter and Fuller have violated Section 36a-805(a)(16) of the Connecticut General Statutes.

5. As a result of the Investigation, the Commissioner finds that the public welfare requires immediate action to issue a temporary order to cease and desist against Zions from violating Section 36a-801(a) of the Connecticut General Statutes, Section 36a-809-10 of the Regulations, subdivision (10) of Section 36a-809-11 of the Regulations, and orders issued by the Commissioner, pursuant to Section 36a-52(b) of the Connecticut General Statutes.

6. As a result of the Investigation, the violations alleged by the Commissioner form the basis to issue an order to make restitution against Zions pursuant to Sections 36a-804(b) and 36a-50(c) of the Connecticut General Statutes.

7. As a result of the Investigation, the violations alleged by the Commissioner form the basis to issue an order to cease and desist against Respondents pursuant to Sections 36a-804(b) and 36a-52(a) of the Connecticut General Statutes.

8. As a result of the Investigation, the violations alleged by the Commissioner form the basis to impose a civil penalty upon Respondents pursuant to Sections 36a-804(b) and 36a-50(a) of the Connecticut General Statutes.

II. MATTERS ASSERTED

9. Zions is a Utah limited liability company with an office at 299 E 950 S, Orem, Utah.

10. Zions has never been licensed to act as a consumer collection agency in Connecticut, nor is Zions otherwise exempt from licensure.

11. As managing members of Zions, Carter and Fuller exercised control over Zions at all times relevant hereto.

Mountain Run Solutions, LLC

12. At all times relevant hereto, Zions was a manager of Mountain Run Solutions, LLC f/k/a Perfection Collection, LLC d/b/a Perfection Collection Services, d/b/a PCS, NMLS # 1713381 (“Mountain Run”).

13. On December 28, 2020, Mountain Run entered into a Consent Order with the Commissioner, whereby it was alleged that Mountain Run acted as a consumer collection agency in Connecticut without a consumer collection agency license, in violation of Section 36a-801(a) of the Connecticut General Statutes, between February 1, 2019 and August 9, 2019, and whereby Mountain Run was ordered, among other sanctions, to cease and desist from further unlicensed consumer collection activity.

14. Mountain Run then became licensed to act as a consumer collection agency in Connecticut from August 19, 2021 until its license expired on January 1, 2023.

Prior Regulatory Action

15. On January 30, 2024, the State of Idaho Department of Finance issued an Order to Cease and Desist against Zions, alleging that Zions engaged in collection activities in Idaho without a license in violation of Section 26-2223 of the Idaho Code, and ordering that Zions and its agents and employees immediately cease and desist from acts, practices, or omissions which constitute a violation of the Idaho Collection Agency Act, including specifically from engaging in collection activity in Idaho without the license required by such act.

Recent Connecticut Regulatory Actions

16. On August 21, 2024, the Commissioner issued a Temporary Order to Cease and Desist, Order to Make Restitution, Notice of Intent to Issue Order to Cease and Desist, Notice of Intent to Impose Civil Penalty and Notice of Right to Hearing against Zions in connection with Zions’s: acting within this state as a consumer collection agency without a license, in violation of Section 36a-801(a) of the Connecticut General Statutes; using false, deceptive or misleading representations in connection with the collection of a debt, including using a false representation or deceptive means to collect or attempt to collect a debt by holding itself out to Connecticut consumers as a consumer collection agency while unlicensed in Connecticut, in violation of subdivision (10) of Section 36a-809-11 of the Regulations; and making false

statements in correspondence submitted to the Department during its investigation, in violation of Section 36a-53a of the Connecticut General Statutes.

17. On December 31, 2024, the Commissioner and Zions entered into a Consent Order in resolution of the matter referenced in paragraph 16, above (“2024 Consent Order”). The 2024 Consent Order was agreed to and signed by Carter on behalf of Zions. The 2024 Consent Order required that Zions cease and desist from:

- (a) acting as a consumer collection agency in this state without a license, in violation of Section 36a-801(a) of the Connecticut General Statutes;
- (b) using false, deceptive or misleading representations in connection with the collection of a debt, including using a false representation or deceptive means to collect or attempt to collect a debt by holding itself out to Connecticut consumers as a consumer collection agency while unlicensed in Connecticut, in violation of subdivision (10) of Section 36a-809-11 of the Regulations; and (c) making false or misleading statements in correspondence submitted to the Department, in violation of Section 36a-53a of the Connecticut General Statutes.

The 2024 Consent Order further required Zions to pay a civil penalty of \$20,000 and back licensing fees of \$800. In connection with the 2024 Consent Order, Zions represented that it made restitution to Connecticut consumers by refunding all payments made by Connecticut consumers that were collected by Zions since August 20, 2019.

Recent Connecticut Consumer Complaint

18. On May 30, 2025, the Department received a complaint from a Connecticut consumer concerning Zions’s unlicensed consumer collection agency activity of a disputed debt.

19. On May 20, 2025, Zions mailed a letter to the Connecticut consumer attempting to collect an alleged debt. The letter states “**ZIONS DEBT HOLDINGS is a debt collector.** We are trying to collect a debt that you owe to BRINKS. We will use any information you give us to help collect the debt.” The return address on the letter is “ZIONS DEBT HOLDINGS, PO BOX 878, SPANISH FORK UT 84660-0878”. The letter provided an account number, and alleges that as of December 9, 2023, the Connecticut consumer owed a debt of \$39.46, to which \$11.69 in interest and \$60.00 in fees were added, totaling \$111.15.

20. Copies of e-mail communication to the Connecticut consumer from Jackson Fox on behalf of Zions was provided to the Department and is detailed, in pertinent part, as follows:

Subject: Zions Debt Holdings owns your past due Brinks account

May 29, 2025 - 2:03PM

[Consumer's name]! We bought your past due Brinks account. Your account is set to be reported to the Credit Bureaus on 7/11/2025. Give us a call to set up a payment plan or you can reply to this email to receive instructions on how to pay online. ~Zions Debt Holdings.

...

May 29, 2025 - 5:56PM

You haven't received any bills from [Brinks] because it was sent to collections because of the outstanding balance that wasn't being paid. Emails do count as written communications but we need the propeller [sic] cancellation documents from Brinks for it to be valid. Those documents take up to a week to get to you so you're just going to have to be patient sir.

...

May 29, 2025 - 6:00PM

I can provide you an email but just so you know just because you dispute it doesn't change anything nor get rid of the debt. Doesn't sound like you have anything to dispute here sir, it's a valid debt. Just because you're unhappy with it doesn't cut it for grounds of getting rid of it. All disputes go to claudia@zionsdebtholdings.com.

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May 30, 2025 - 10:30AM

[N]ot sure what you mean by aggressive, I'm just done going back and forth with you when you don't listen to a thing I say. This will be the last email I respond back to. As far as it stands once more.. your validation of debt is on the way and will be sent to you as soon as possible and no, we do not have to cease collection just because you claim dispute, a dispute that might I add that has no proof to back it up, it's just word of mouth from you which doesn't cut or change anything. We need documented proof from Brinks to back what you say for a dispute to be valid. If you wish to talk to us any further or have any other questions regarding your debt call us at 385-303-9778. This will hit your credit on 7/11/25 if not paid in full by then. Take care [consumer name] and we look forward to your call should you choose to make one.

21. On May 30, 2025, Zions advised the Connecticut consumer that it had closed the account.

III. STATUTORY BASIS FOR ORDER TO MAKE RESTITUTION, ORDER TO CEASE AND DESIST AND IMPOSITION OF CIVIL PENALTY

22. Zions's acting within this state as a consumer collection agency without a consumer collection agency license, as more fully described in paragraphs 18 through 21, inclusive, constitutes violations of Section 36a-801(a) of the Connecticut General Statutes, and violations of the 2024 Consent Order. Such violations form the basis to issue an order to make restitution pursuant to Sections 36a-804(b) and 36a-50(c) of the Connecticut General Statutes, issue an order to cease and desist against Zions pursuant to Sections 36a-804(b) and 36a-52(a) of the Connecticut General Statutes, and to impose a civil penalty upon Zions pursuant to Sections 36a-804(b) and 36a-50(a) of the Connecticut General Statutes. Section 36a-50(a) of the Connecticut General Statutes authorizes the Commissioner to impose a civil penalty upon Zions in an amount not to exceed One Hundred Thousand Dollars (\$100,000) per violation.

23. Zions's contacting the Connecticut consumer via electronic mail in a harassing or abusive manner in connection with the collection of a debt, as more fully described in paragraphs 18 through 21, inclusive, constitutes violations of Section 36a-809-10 of the Regulations. Such violations form the basis to issue an order to make restitution pursuant to Sections 36a-804(b) and 36a-50(c) of the Connecticut General Statutes, issue an order to cease and desist against Zions pursuant to Sections 36a-804(b) and 36a-52(a) of the Connecticut General Statutes, and to impose a civil penalty upon Zions pursuant to Sections 36a-804(b) and 36a-50(a) of the Connecticut General Statutes. Section 36a-50(a) of the Connecticut General Statutes authorizes the Commissioner to impose a civil penalty upon Zions in an amount not to exceed One Hundred Thousand Dollars (\$100,000) per violation.

24. Zions's using false, deceptive or misleading representations in connection with the collection of a debt, including using a false representation or deceptive means to collect or attempt to collect a debt by holding itself out to Connecticut consumers as a consumer collection agency while unlicensed in Connecticut, as more fully described in paragraphs 18 through 21, inclusive, constitutes violations of subdivision (10) of Section 36a-809-11 of the Regulations, and violations of the 2024 Consent Order. Such violations form the basis to issue an order to make restitution pursuant to Sections 36a-804(b) and 36a-50(c) of the Connecticut General Statutes, issue an order to cease and desist against Zions pursuant to

Sections 36a-804(b) and 36a-52(a) of the Connecticut General Statutes, and to impose a civil penalty upon Zions pursuant to Sections 36a-804(b) and 36a-50(a) of the Connecticut General Statutes. Section 36a-50(a) of the Connecticut General Statutes authorizes the Commissioner to impose a civil penalty upon Zions in an amount not to exceed One Hundred Thousand Dollars (\$100,000) per violation.

25. Zions failed to establish, enforce and maintain policies and procedures for supervising employees, agents and office operations that are reasonably designed to achieve compliance with applicable consumer collection laws and regulations, as more fully described in paragraphs 9 through 21, inclusive, in violation of Section 36a-805(a)(16) of the Connecticut General Statutes. Such violation forms the basis to issue an order to cease and desist against Zions pursuant to Sections 36a-804(b) and 36a-52(a) of the Connecticut General Statutes and to impose a civil penalty upon Zions pursuant to Sections 36a-804(b) and 36a-50(a) of the Connecticut General Statutes. Section 36a-50(a) of the Connecticut General Statutes authorizes the Commissioner to impose a civil penalty upon Zions in an amount not to exceed One Hundred Thousand Dollars (\$100,000) per violation.

26. Carter, as Zions's control person, failed to establish, enforce and maintain policies and procedures for supervising employees, agents and office operations of Zions that are reasonably designed to achieve compliance with applicable consumer collection laws and regulations, as more fully described in paragraphs 9 through 21, inclusive, in violation of Section 36a-805(a)(16) of the Connecticut General Statutes. Such violation forms the basis to issue an order to cease and desist against Carter pursuant to Sections 36a-804(b) and 36a-52(a) of the Connecticut General Statutes and to impose a civil penalty upon Carter pursuant to Sections 36a-804(b) and 36a-50(a) of the Connecticut General Statutes. Section 36a-50(a) of the Connecticut General Statutes authorizes the Commissioner to impose a civil penalty upon Carter in an amount not to exceed One Hundred Thousand Dollars (\$100,000) per violation.

27. Fuller, as Zions's control person, failed to establish, enforce and maintain policies and procedures for supervising employees, agents and office operations of Zions that are reasonably designed to achieve compliance with applicable consumer collection laws and regulations, as more fully described in paragraphs 9 through 21, inclusive, in violation of Section 36a-805(a)(16) of the Connecticut General

Statutes. Such violation forms the basis to issue an order to cease and desist against Fuller pursuant to Sections 36a-804(b) and 36a-52(a) of the Connecticut General Statutes and to impose a civil penalty upon Fuller pursuant to Sections 36a-804(b) and 36a-50(a) of the Connecticut General Statutes. Section 36a-50(a) of the Connecticut General Statutes authorizes the Commissioner to impose a civil penalty upon Fuller in an amount not to exceed One Hundred Thousand Dollars (\$100,000) per violation.

IV. FINDING AND STATUTORY BASIS FOR TEMPORARY ORDER TO CEASE AND DESIST

The Commissioner finds that the public welfare requires immediate action to issue a temporary order requiring Zions to cease and desist from violating Section 36a-801(a) of the Connecticut General Statutes, Section 36a-809-10 of the Regulations, subdivision (10) of Section 36a-809-11 of the Regulations, and orders issued by the Commissioner, and requiring Zions to take such action as set forth herein to effectuate the purposes of Section 36a-52(b) of the Connecticut General Statutes, in that the interests of Connecticut consumer debtors are being prejudiced by Respondent's continued collecting and attempting to collect debts of Connecticut consumer debtors while not duly licensed in a harassing and abusive manner.

V. TEMPORARY ORDER TO CEASE AND DESIST, ORDER TO MAKE RESTITUTION, NOTICE OF INTENT TO ISSUE ORDER TO CEASE AND DESIST, NOTICE OF INTENT TO IMPOSE CIVIL PENALTY AND NOTICE OF RIGHT TO HEARING

WHEREAS, the Commissioner has reason to believe that Zions has engaged in acts or conduct which forms a basis to issue an order to make restitution against Zions pursuant to Sections 36a-804(b) and 36a-50(c) of the Connecticut General Statutes, an order to cease and desist against Zions pursuant to Sections 36a-804(b) and 36a-52(a) of the Connecticut General Statutes, and to impose a civil penalty upon Zions pursuant to Sections 36a-804(b) and 36a-50(a) of the Connecticut General Statutes;

WHEREAS, the Commissioner has reason to believe that Carter and Fuller have engaged in acts or conduct which forms the basis to issue an order to cease and desist against Carter and Fuller pursuant to Sections 36a-804(b) and 36a-52(a) of the Connecticut General Statutes, and to impose a civil penalty

upon Carter and Fuller pursuant to Sections 36a-804(b) and 36a-50(a) of the Connecticut General Statutes;

AND WHEREAS, the Commissioner has made the finding required under Section 36a-52(b) of the Connecticut General Statutes.

THE COMMISSIONER THEREFORE ORDERS, pursuant to the authority granted in Section 36a-52(b) of the Connecticut General Statutes, that Zions Debt Holdings, LLC immediately **CEASE AND DESIST** from: engaging in the business of a consumer collection agency in this state without obtaining the required license in violation of Section 36a-801(a) of the Connecticut General Statutes; contacting Connecticut consumers in a harassing or abusive manner in connection with the collection of a debt, in violation of Section 36a-809-10 of the Regulations; using false, deceptive or misleading representations in connection with the collection of a debt, including using a false representation or deceptive means to collect or attempt to collect a debt by holding itself out to Connecticut consumers as a consumer collection agency while unlicensed in Connecticut, in violation of subdivision (10) of Section 36a-809-11 of the Regulations; and violating orders issued by the Commissioner. This Temporary Order to Cease and Desist shall become effective upon receipt by Zions Debt Holdings, LLC and, unless set aside or modified by a court, shall remain in effect until the effective date of a permanent order or dismissal of the matters asserted in this Temporary Order to Cease and Desist.

THE COMMISSIONER FURTHER ORDERS, pursuant to the authority granted in Sections 36a-17 and 36a-52(b) of the Connecticut General Statutes, that: Not later than fourteen (14) days from receipt of this Temporary Order to Cease and Desist, Zions Debt Holdings, LLC shall provide to Swarupa Madhavan, Paralegal, Consumer Credit Division, Department of Banking, 260 Constitution Plaza, Hartford, Connecticut 06103-1800, or swarupa.madhavan@ct.gov, an itemized list of all Connecticut consumer collection activity, including any debt it collected, attempted to collect on, or received monies for, since December 31, 2024, including: (a) the name, address and telephone number of each consumer debtor, (b) the date of placement with Zions Debt Holdings, LLC, the creditor name and last attempt of

contact, and (c) full itemization of each consumer debtor's payments made since December 31, 2024, specifying the dates, amounts and to whom such payments were made, including any fees paid to Zions Debt Holdings, LLC.

THE COMMISSIONER FURTHER ORDERS, pursuant to Section 36a-50(c) of the Connecticut General Statutes that Zions Debt Holdings, LLC **MAKE RESTITUTION** of any sums obtained as a result of Zions Debt Holdings, LLC violating Section 36a-801(a) of the Connecticut General Statutes, Section 36a-809-10 of the Regulations and subdivision (10) of Section 36a-809-11 of the Regulations, plus interest at the legal rate set forth in Section 37-1 of the Connecticut General Statutes, since December 31, 2024. Specifically, the Commissioner **ORDERS** that: Not later than thirty (30) days from the date this Order to Make Restitution becomes permanent, Zions Debt Holdings, LLC shall promptly refund all payments made by Connecticut consumers that were collected by Zions Debt Holdings, LLC since December 31, 2024, and provide evidence of such refund to Swarupa Madhavan, Paralegal, Consumer Credit Division, Department of Banking, 260 Constitution Plaza, Hartford, Connecticut 06103-1800, or swarupa.madhavan@ct.gov

NOW THEREFORE, notice is hereby given to Zions that the Commissioner intends to issue an order requiring Zions to **CEASE AND DESIST** from violating Section 36a-801(a) of the Connecticut General Statutes, Section 36a-805(a)(16) of the Connecticut General Statutes, Section 36a-809-10 of the Regulations, subdivision (10) of Section 36a-809-11 of the Regulations, and orders issued by the Commissioner, and to impose a **CIVIL PENALTY** upon Zions as set forth herein, subject to Zions's right to a hearing on the allegations set forth above;

FURTHER, notice is hereby given to Carter that the Commissioner intends to issue an order requiring him to **CEASE AND DESIST** from violating Section 36a-805(a)(16) of the Connecticut General Statutes, and to impose a **CIVIL PENALTY** upon Carter as set forth herein, subject to his right to a hearing on the allegation set forth above;

FURTHER, notice is hereby given to Fuller that the Commissioner intends to issue an order requiring him to **CEASE AND DESIST** from violating Section 36a-805(a)(16) of the Connecticut

General Statutes, and to impose a **CIVIL PENALTY** upon Fuller as set forth herein, subject to his right to a hearing on the allegation set forth above;

A hearing will be granted to each Respondent if a written request for a hearing is received by the Department of Banking, Consumer Credit Division, 260 Constitution Plaza, Hartford, Connecticut 06103-1800 or submitted by e-mail to DOB.hearingsupport@ct.gov within fourteen (14) days following each Respondent's receipt of this Temporary Order to Cease and Desist, Order to Make Restitution, Notice of Intent to Issue Order to Cease and Desist, Notice of Intent to Impose Civil Penalty and Notice of Right to Hearing as set forth in Sections 36a-50(c), 36a-52(a) and 36a-50(a) of the Connecticut General Statutes. This Temporary Order to Cease and Desist, Order to Make Restitution, Notice of Intent to Issue Order to Cease and Desist, Notice of Intent to Impose Civil Penalty and Notice of Right to Hearing shall be deemed received on the earlier of the date of actual receipt, or seven (7) days after mailing or sending. To request a hearing, complete and return the enclosed Appearance and Request for Hearing Form to one of the above-referenced addresses. If any Respondent will not be represented by an attorney at the hearing, please complete the Appearance and Request for Hearing Form as "pro se".

If a hearing is requested, it will be held in person at the Department's offices. Once a written request for a hearing is received, the Commissioner may issue a notification of hearing and designation of hearing officer that acknowledges receipt of a request for a hearing, designates a hearing officer and sets the date of the hearing in accordance with Section 4-177 of the Connecticut General Statutes and Section 36a-1-21 of the Regulations. At the discretion of the Hearing Officer, for good cause shown, the Hearing Officer may approve requests for remote participation in the hearing by a Respondent, witness, or attorney. If such requests are approved by the Hearing Officer, such remote participation will be conducted via videoconference. If a hearing is requested, the hearing will be held on November 26, 2025, at 10 a.m.

If a hearing is requested, it will be held in accordance with the provisions of Chapter 54 of the Connecticut General Statutes, unless any Respondent fails to appear at the requested hearing. At such hearing, each Respondent will have the right to appear and present evidence, rebuttal evidence and

argument on all issues of fact and law to be considered by the Commissioner. Remote participation in a hearing will be held in accordance with Section 1-225a of the Connecticut General Statutes, and the Remote Hearing Guidelines available on the Department's website at <https://portal.ct.gov/dob>.

If Zions does not request a hearing within the time prescribed or fails to appear at any such hearing, the allegations herein will be deemed admitted. Accordingly, the Order to Make Restitution shall remain in effect and become permanent, and the Commissioner will issue an order that Zions cease and desist from violating Section 36a-801(a) of the Connecticut General Statutes, Section 36a-805(a)(16) of the Connecticut General Statutes, Section 36a-809-10 of the Regulations, subdivision (10) of Section 36a-809-11 of the Regulations, and orders issued by the Commissioner, and may order a civil penalty in an amount not to exceed One Hundred Thousand Dollars (\$100,000) per violation be imposed upon Zions.

If Carter does not request a hearing within the time prescribed or fails to appear at any such hearing, the allegation herein will be deemed admitted. Accordingly, the Commissioner will issue an order that Carter cease and desist from violating Section 36a-805(a)(16) of the Connecticut General Statutes and may order a civil penalty in an amount not to exceed One Hundred Thousand Dollars (\$100,000) per violation be imposed upon Carter.

If Fuller does not request a hearing within the time prescribed or fails to appear at any such hearing, the allegation herein will be deemed admitted. Accordingly, the Commissioner will issue an order that Fuller cease and desist from violating Section 36a-805(a)(16) of the Connecticut General Statutes and may order a civil penalty in an amount not to exceed One Hundred Thousand Dollars (\$100,000) per violation be imposed upon Fuller.

Dated at Hartford, Connecticut,
This 25 day of September 2025.

/s/

Jorge L. Perez
Banking Commissioner

CERTIFICATION

I hereby certify that on this 25 day of September 2025, the foregoing Temporary Order to Cease and Desist, Order to Make Restitution, Notice of Intent to Issue Order to Cease and Desist, Notice of Intent to Impose Civil Penalty and Notice of Right to Hearing was sent by certified mail, return receipt requested, to Zions Debt Holdings, LLC, 299 E 950 S, Orem, Utah 84058, Certified Mail No. 70151520000018248842; Zions Debt Holdings, LLC, Attention, Christopher Carter, Owner, PO Box 878, Spanish Fork, Utah 84660, Certified Mail No. 70151520000018248859; Christopher Thayne Carter, 261 N 2350 E, Spanish Fork, Utah, 84660, Certified Mail No. 70151520000018248866; and Brian Scott Fuller, 129 W Sycamore Lane, Orem, Utah 84059, Certified Mail No. 70151520000018248873.

/s/

Swarupa Madhavan
Paralegal