

File No. 95323/PH

NOV 18 2025

Rec'd \$ 393.75

STATE OF MINNESOTA
DEPARTMENT OF COMMERCE

In the Matter of the Unlicensed Collection
Agency Services of Westhill Exchange, LLC

CONSENT ORDER

Commissioner of Commerce Grace Arnold has determined as follows:

1. The Commissioner commenced a regulatory proceeding against Respondent Westhill Exchange, LLC by issuing a notice and order for prehearing conference dated September 24, 2025, alleging violations of Minn. Stat. ch. 332. Specifically, the Commissioner alleged that Westhill Exchange engaged in collection activities in Minnesota without a valid license, violating Minn. Stat. §§ 332.33, subd. 1 (2024).

2. Westhill Exchange, LLC acknowledges that it was advised of its right to a hearing in this matter, to present argument to the Commissioner, and to appeal from any adverse determination after a hearing. Westhill Exchange, LLC expressly waives those rights. Westhill Exchange, LLC further acknowledges that it was advised of its right to be represented by legal counsel and it is waiving its right to be represented by counsel.

3. Westhill Exchange, LLC expressly waives its right to any notice or opportunity for a hearing on any civil penalty imposed by the Commissioner. Westhill Exchange, LLC further acknowledges that Minn. Stat. § 16D.17 (2022) allows the Commissioner to file and enforce any unpaid civil penalty imposed by this order as a judgment against it in district court without further notice or additional proceedings.

4. Westhill Exchange, LLC acknowledges that the civil penalty or any resulting judgment arising from this order is non-dischargeable in any bankruptcy proceeding. *See* 11 U.S.C. 523 (a)(7) ("A discharge under section 727, 1141, 1228(a), 1228(b) or 1328(b) of this

title does not discharge an individual debtor from any debt . . . to the extent such debt is for a fine, penalty, or forfeiture payable to and for the benefit of a governmental unit, and is not compensation for actual pecuniary loss, other than a tax penalty . . .”).

5. The following order is in the public interest.

Now, therefore, it is ordered, pursuant to Minn. Stat. ch. 45 (2024), as follows:

A. Westhill Exchange, LLC shall pay a civil penalty in the amount of \$50,000 to the State of Minnesota. The Commissioner has stayed \$50,000 of this penalty. The stayed portion of the civil penalty may be lifted if Westhill Exchange, LLC violates any law, rule, or order related to the duties and responsibilities entrusted to the Commissioner. If the Commissioner determines that Westhill Exchange, LLC has committed further violations of any law, rule, or order over which the Commissioner has authority, the stay shall be lifted and the stayed portion of the penalty shall become effective in addition to any additional sanctions the Commissioner deems appropriate for the new violation(s). If the Commissioner seeks to lift the stay, Westhill Exchange, LLC may request a hearing to challenge the factual basis for lifting the stay, but may not challenge the amount of the stayed penalty.

B. Westhill Exchange, LLC is permanently barred from applying for and obtaining a collection agency license in the State of Minnesota.

C. Westhill Exchange, LLC shall cease and desist from further violations of Minn. Stat. Ch. 332 and from violating any laws, rules, or orders related to the duties and responsibilities entrusted to the Commissioner under Minnesota Statute.

D. Westhill Exchange, LLC shall pay all investigative costs in the amount of \$393.75 at the time the Consent to Entry of Order is signed pursuant to Minn. Stat. § 45.027, subd. 1(8) (2024).

This consent order shall be effective upon signature on behalf of the Commissioner.

Dated: November 26, 2025

GRACE ARNOLD
Commissioner



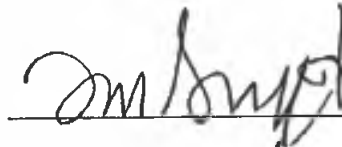
~~JACQUELINE OLSON~~ SARA PAYNE
Assistant Commissioner of Enforcement

Minnesota Department of Commerce
85 Seventh Place East, Suite 280
St. Paul, MN 55101
(651) 539-1600

CONSENT TO ENTRY OF ORDER

The undersigned states that he has read the foregoing consent order, that he fully understands its contents and effect, that he is authorized to execute this consent order on behalf of Westhill Exchange, LLC, that he has been advised of its right to a hearing, that he has been advised of its right to counsel, and that he consents to entry of this order by the Commissioner. It is further expressly understood that this order constitutes the entire settlement agreement between the parties hereto, there being no other promises or agreements, either express or implied.

Westhill Exchange, LLC



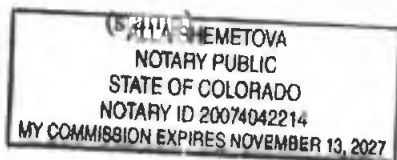
By: Tim Grant
(Print Name)

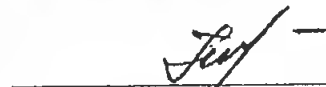
Its: Managing Member
(Title)

STATE OF Colorado

COUNTY OF Arapahoe

This instrument was acknowledged before me on November 12 2025, by _____, on behalf of Westhill Exchange, LLC.




(Signature of notary officer)

Notary Public
Title (and Rank)
My commission expires: 11-13-2027