

STATE OF MINNESOTA  
COMMISSIONER OF COMMERCE

In the Matter of the Unlicensed Collection  
Activity Services of Fast Results Solution  
Group, LLC

**FINDINGS OF FACT,  
CONCLUSIONS OF LAW  
AND ORDER**

The above-entitled matter came before the undersigned on Administrative Law Judge (“ALJ”) Suzanne Todnem’s Findings of Fact, Conclusions of Law, and Recommendation Upon Default.

In accordance with Minn. Stat. § 45.024 (2025), the Commissioner of Commerce delegated the authority to issue a final order in this matter to Greg Merz, the Commissioner’s Designated Decision-Maker (“Commissioner”). The Commissioner informed the parties of their right to file exceptions and arguments with the Commissioner pursuant to Minn. Stat. § 14.61, subd. 1 (2025). On December 1, 2025, the Department filed arguments and a proposed order. Respondent did not file arguments or exceptions. The record closed on December 3, 2025.

**FINDINGS OF FACT**

1. The Commissioner adopts in its entirety and incorporates as her own the Findings of Facts contained in the Administrative Law Judge’s recommendation
2. Any Finding of Fact herein, which should more properly be deemed a Conclusion of Law, is hereby adopted as such.

Based upon the foregoing Findings of Fact, the Commissioner makes the following:

## **CONCLUSIONS OF LAW**

1. The Commissioner adopts in its entirety and incorporates as her own the ALJ's Conclusions of Law.

2. Any Conclusion of Law that should more properly be deemed a Finding of Fact is hereby adopted as such.

3. This order is in the public interest.

## **ORDER**

Fast Results Solution Group, LLC shall pay a \$20,000 civil penalty to the State of Minnesota. Pursuant to Minn. Stat. § 16D.17(1) (2025), Fast Results Solution Group, LLC is notified that this shall become a final civil penalty order unless it requests a hearing from the Commissioner on the civil penalty within thirty days. Pursuant to Minn. Stat. § 16D.17(2) (2025), Fast Results Solution Group, LLC is further notified that when the civil penalty order becomes final, the Commissioner may file and enforce the civil penalty in the same manner as a district court judgment against it without further notice or additional proceedings. Finally, Fast Results Solution Group, LLC is notified that simple interest computed in accordance with Minn. Stat. § 16D.13 (2025) shall begin to accrue on the civil penalty thirty days after the date of this order.

The attached memorandum is incorporated into this Order.

Dated: February 3, 2026

GRACE ARNOLD  
Commissioner

s/Greg Merz \_\_\_\_\_  
GREG MERZ  
Commissioner's Designated Decision-Maker  
Minnesota Department of Commerce  
85 7th Place East, Suite 280  
St. Paul, MN 55101  
(651) 539-1600

## MEMORANDUM

This matter comes before the Commissioner following Administrative Law Judge (“ALJ”) Suzanne Todnem’s recommendation that the Commissioner of the Minnesota Department of Commerce (“Commissioner”) take disciplinary action against Respondent.

### *Commissioner Review*

The Commissioner issues Final Orders and is not bound by an administrative law judge’s recommendation. Minn. Stat. § 14.62, subd. 1 (2025). While the Commissioner “is not bound by the findings, conclusions and recommendations of the ALJ,” she “should not take lightly the ALJ’s findings.” *Bloomquist v. Comm’r of Natural Resources*, 704 N.W.2d 184, 190 (Minn. Ct. App. 2005). The Commissioner, however, “owes no deference to ... the findings, conclusions, or recommendations of the ALJ.” *In re Excess Surplus of Blue Cross & Blue Shield of Minn.*, 624 N.W.2d 264, 278 (Minn. 2001). Instead, the Commissioner must “weigh all of the evidence presented and come to an independent decision.” *Id.*

### *Factual Background*

In November 2024, the Department received a call from a Minnesota consumer who stated that she had been contacted by phone by someone who claimed that the consumer had an unpaid loan and that nonpayment would constitute fraud. The consumer received, via email, payment arrangement forms from the email address “SUPPORT@FASTRESULTSSOLUTIONGROUP.COM.” Based on the caller’s representation that she was obligated to pay, the consumer filled out forms authorizing ACH withdrawals from her bank account. FAST RESULTS SOLUTION made two withdrawals from the consumer’s account in December 2024, totaling \$330.00.

In order to investigate this incident, the Department sent Respondent, at its registered business address, an information request for information regarding Respondent's collection activity in Minnesota. When Respondent failed to respond to the information request, the Department served the Respondent with an administrative subpoena requesting the same information. The administrative subpoena was served via USPS Certified Mail to Respondent's registered business address and also to the address on Respondent's website. The Department received return receipts from both addresses. However, Respondent did not respond to the subpoena.

On July 18, 2025, the Department served the Respondent with a notice of pretrial conference to be held on September 5, 2025, before ALJ Todnem. The notice of pretrial conference alleged that Respondent had violated Minnesota Statutes § 332.33 by conducting collection activity in Minnesota without a license and that Respondent had violated Minnesota Statutes § 45.027, subd. 1a, by failing to respond to the Department's requests for collection data on Minnesota customers. The notice of pretrial conference was served on Respondent at its registered address and the notice was not returned as undeliverable.

Respondent did not appear at the time notice for the pretrial conference, nor did the Respondent request a continuance or have any other communication with the Court of Administrative Hearings.

On September 5, 2025, ALJ Todnem issued to Respondent an order to show cause notifying Respondent that, as a result of its failure to appear for the pretrial conference, the Department had requested that Respondent be found in default. The order to show cause

directed Respondent to contact the Court of Administrative Hearings by 4:30 on September 22, 2025, to explain its failure to appear. Respondent did not comply or otherwise respond to the order to show cause.

On October 3, 2025, the ALJ issued her Findings of Fact, Conclusions of Law, and Recommendation Upon Default, recommending that the Department take disciplinary action against the Respondent.

### *Analysis*

As the party proposing that a certain action be taken, the Department has the burden of proving the facts at issue by a preponderance of the evidence. Minn. Rules part 1400.7300, subp. 5 (2025). For the reasons discussed below the Department has carried its burden of proof justifying disciplinary action against Respondent.

Minnesota Rules part 1400.6000 permits an agency to dispose of a contested case adverse to a party that defaults. The rule further provides:

Upon default, the allegations of or the issues set out in the notice of and order for hearing or other pleading may be taken as true or deemed proved without further evidence. A default occurs when a party fails to appear without the prior consent of the judge at a prehearing conference, settlement conference, or a hearing or fails to comply with any interlocutory orders of the judge.

Here, the Respondent was duly served with a notice and order for hearing setting the date and time of the prehearing conference and Respondent, without the prior consent of the ALJ, failed to appear. Subsequently, Respondent was duly served with the ALJ's order that it show cause for its failure to appear for the prehearing conference and Respondent failed to comply with that order. Respondent is therefore in default and the allegations contained in the notice of prehearing conference, including that Respondent violated

Minnesota Statutes § 332.33 by conducting collection activity in Minnesota without a license and that Respondent violated Minnesota Statutes § 45.027, subd. 1a, by failing to respond to the Department's requests for collection data on Minnesota customers, are deemed proved.

#### *Civil Penalty*

Minn. Stat. § 45.027, subd. 6 (2025), authorizes the Commissioner to impose civil penalties of up to \$10,000 per violation. The Commissioner looks to the following factors in imposing sanctions, pursuant to Minn. Stat. § 14.045, subd. 3 (2025):

1. The willfulness of the violation;
2. The gravity of the violation, including damage to humans, animals, and the nature resources of the state;
3. The history of past violations;
4. The number of violations;
5. The economic benefit gained by the person by allowing or committing the violation; and
6. Other factors that justice may require.

The purpose of a civil penalty is to both specifically and generally deter similar conduct by lowering the incentive to engage in such conduct and, thus, aid the state in enforcement of the statutes for which it is responsible. See *State by Humphrey v. Alpine Air Products, Inc.*, 500 N.W.2d 788, 792 (Minn. 1993) ("Hopefully, a payment of a civil penalty will both specifically and generally deter similar conduct. The civil penalty also furthers a legitimate purpose other than punishment: It lowers the incentive to engage in consumer fraud and thus aids the state in enforcement of the statute.")

A significant civil penalty against Respondent is appropriate based on the record. First, Respondent's actions were willful. The obligation to obtain a license in order to do business as a collection agency is clear. See Minn. Stat. § 332.33 (2024). Similarly clear is the Respondent's duty to comply with the Department's request for information. See Minn. Stat. § 45.027, subd. 1a. Respondent's willfulness is further as demonstrated by its ignoring duly authorized and served orders of the Department and Court of Administrative Hearings. Respondent was made aware in the notice and order for prehearing conference of the consequences of failing to respond. Respondent had an opportunity to offer such explanation or defense as it believed appropriate but chose, instead, to simply ignore the Department's and the ALJ's orders.

Further, the violations are serious. Both the licensing requirement and the requirement to comply with the Department's requests for information are critical to the protection of the public from predatory conduct. Lower income individuals are especially vulnerable to such conduct. Further, violations of these requirements impinge on the Department's ability to exercise necessary oversight. Indeed, by refusing to provide information regarding its collection activities in Minnesota, Respondent has prevented the Department from determining the full extent of its wrongful conduct.

The evidence shows that Respondent committed two violations.

Accordingly, pursuant to Minn. Stat. § 45.027, subd. 6 (2025), a civil penalty of \$20,000.00 is appropriate and consistent with the statutory range that sets a maximum penalty of \$10,000.00 per violation.

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