

From: Janet Wilcox
To: [DFPI Regulations](#)
Subject: Definition of debt collector
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Attachments: [image001.png](#)

We are a law firm that represents homeowners association. We do collect delinquent assessments from homeowners for our clients, but it is through the lien process. We are not the true definition of a debt collector, yet we are held to all the laws regarding debt collection. The Davis Stirling act governs associations. Nevertheless, we do comply with FDCPA and Rosenthal. We understand that we do not fit the definition under the Rosenthal Act of a debt collector and wonder if we still need to be licensed. The way we collect a debt is to send a demand letter, put a lien on the property if there is no response. Rarely will the Association want to foreclose on the lien, but it does happen. In other words, we don't call and harass our homeowners. It is a procedure that we must follow per Davis Stirling.

Yours truly,

Janet Wilcox



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