



OFFICE OF THE ATTORNEY GENERAL
CONNECTICUT

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ASSISTANT ATTORNEY GENERAL

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February 2, 2023

By Certified Mail

C F Division Services, LLC,
a/k/a CT UCC Statement Service
19477 NE 10th Ave., Apt. 210
North Miami Beach, FL 33179
Attn.: Edwin Alamo, Manager

Re: *Connecticut UCC Statement Request Form*

Dear Mr. Alamo:

Our office has learned that your company, C F Division Services, LLC (the “Company”), may have sent the attached “Connecticut UCC Statement Solicitation Form” (the “Solicitation”) to Connecticut consumers. The Solicitation appears to misrepresent that it comes from a government agency and that the recipient is required to purchase the specified form from the company. While the Solicitation does purport to include a disclaimer, the relevant language is not set forth in a clear and conspicuous manner, giving rise to our concern that consumers may be deceived into purchasing the Company’s services.

So that we may better understand the Company’s business practices and its dealings with Connecticut consumers, we ask that the Company provide the following information within thirty (30) days of the date of this letter:

(1) **Identification of Responder**

- (a) Identify the person or individuals answering and/or assisting in answering this request on the Company’s behalf.
- (b) Identify the individual(s) with the authority to, and best ability to, answer questions regarding the subject matter of this request.

(2) **Corporate Information**

- (a) Produce all documents reflecting the Company’s legal identity and organization, including but not limited to organizational charts, all articles of

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Hartford, Connecticut 06106

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organization or incorporation, articles of amendment, articles of reinstatement, and operating agreements.

- (b) Identify the Company's corporate officers, directors, managers, members, partners, and board members.
- (c) Identify any entity which is currently or has been the parent company of the Company.
- (d) Identify any entity that is currently or has been a subsidiary of the Company.
- (e) Identify any entity that is currently or has been an affiliate of the Company.
- (f) Identify all physical addresses, post office boxes, telephone numbers, web addresses and email addresses from which the Company conducts business or has conducted business in or from Connecticut.
- (g) Identify all addresses and telephone numbers for each and every location from which the Company conducts business and indicate which of these are used to conduct business in Connecticut or from Connecticut.
- (h) Identify the director, office manager, supervisor and/or manager responsible for each location identified in response to previous question. Include the geographic area of responsibility for each of those individuals as well as the store and/or location in those areas.
- (j) Identify all the websites the Company have operated any of the Company's business(es) from or advertised any of the Company's products and services from or to Connecticut consumers.
- (j) If the Company's business is not incorporated or not in good standing, identify all individuals doing business as the Company, and each of their responsibilities relating to the day-to-day operations of the Company.
- (k) Fully describe the Company's reasons for using 341 East Center Street #141, Manchester, CT 06040 as the Company's mailing address and provide copies of all contracts and communications between you and the business located at 341 East Center Street #141, Manchester, CT 06040.
- (k) Produce copies of all trade name certificates filed by the Company in Connecticut, along with the date and location of each filing.

(3) **Dealings with Connecticut Consumers**

Provide a detailed description of the Company's business, including the Company's dealings with Connecticut consumers. In the Company's response include:

- (a) Exemplars of all solicitations or offers the Company sent or directed to Connecticut consumers, whether by mail, electronically or by other means, along with the number of each such solicitation or offer sent, and the date(s) of mailing or transmission;
- (b) The identity of each Connecticut consumer who received each solicitation or offer; and
- (c) The identity of each person responsible for preparing, reviewing, editing, or approving any solicitation or offer sent or directed to Connecticut consumers.

(4) **Consumer Information**

Produce an electronically searchable list, whether created as a query or report from existing applications or databases, or created separately, of all Connecticut consumers to whom you sent or directed any of the offers or solicitations described in repose to Number 3. The list shall include all of the following as required by the definitions above:

- (a) The identity of the consumer;
- (b) The date of any offer or solicitation;
- (c) Copies of all documents the Company prepared or submitted on behalf of Connecticut consumers, the agency where the documents were filed, and the date of such filings;
- (d) Copies of all communications between you and any Connecticut consumer;
- (e) The process you used to identify the Connecticut consumers who received the Company's solicitations or offers; and
- (f) The identity of all persons responsible for receiving, reviewing, and approving such filings.

(5) **Payment and Refunds**

Produce all documents and communications to show by month and by calendar year The Company's revenues and pre-tax profits, before refunds or charge backs, You received in connection with the Company's sale of any product or service to Connecticut consumers. In the Company's response, identify:

- (a) Each Connecticut consumer who paid for or purchased any product or service from the Company;
- (b) The specific product or service purchased, and amount paid for each purchase (including all taxes and fees by whatever name) by each Connecticut consumer;
- (c) All documents or communications regarding the Company's refund policy, including any written policy, or if no written policy exists, a description of said policy, and whether and how any refund policy was communicated to Connecticut consumers;
- (d) The Company's merchant processor; and
- (e) Any documents or communications reflecting or regarding the Company's monthly chargeback rate and other refunds the Company gave to Connecticut consumers, along with the reasons for such chargebacks or refunds, including the identity of the Connecticut consumer, the amount of the refund or chargeback, and the reasons therefore, along with the identity of each person responsible for responding to or approving any requests for refunds or chargebacks.

(6) **Complaint Handling**

- (a) Produce all documents or communications concerning the Company's procedures for receiving, processing, and responding to consumer complaints. In the Company's response, identify each person responsible for drafting, reviewing, revising, or approving such procedures.
- (b) Identify each person responsible for supervising, preparing, revising, or approving the Company's responses to consumer complaints.
- (b) Produce all documents or communications the Company received concerning complaints from Connecticut consumers. Include in the Company's response any telephone calls made from consumers directly to

the Company in which a consumer complaint was made. Also produce any documents or communications containing a response by or on behalf of the Company to any Connecticut consumer complainant. Please indicate whether it is possible to provide this information by creating queries or reports from existing applications or databases, and if so, what fields are included in the query or report.

- (c) Produce all documents or communications used by the Company as internal training materials for staff or individuals dealing with consumer complaints or inquiries.

(7) **Other Investigations or Lawsuits and Miscellaneous Documents**

Please produce all documents or communications relating to any investigation of, or legal proceedings initiated by, governmental authorities other than Connecticut, or by private plaintiffs, concerning solicitations or offers that the Company or any affiliate, parent, or subsidiary entity, sent or directed to Consumers with addresses not located in Connecticut since 2020. For the avoidance of doubt, this Request includes investigations of, or legal proceedings concerning or directed to any entities affiliated with, owned, or controlled the Company or Edwin Alamo.

Very truly yours,

Brendan T. Flynn

Brendan T. Flynn

BTF/bms