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**IN THE MATTER OF:**  
  
**CREDIT PROTECTION  
ASSOCIATION, L. P.  
d/b/a CREDIT PROTECTION  
ASSOCIATION, LIMITED  
PARTNERSHIP  
NMLS # 933191**  
  
**(“Respondent”)**  
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**NOTICE OF INTENT TO REVOKE  
CONSUMER COLLECTION  
AGENCY LICENSES**  
  
**NOTICE OF INTENT TO ISSUE  
ORDER TO CEASE AND DESIST**  
  
**NOTICE OF INTENT TO IMPOSE  
CIVIL PENALTY**  
  
**AND**  
  
**NOTICE OF RIGHT TO HEARING**

**I. PRELIMINARY STATEMENT**

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 (“Division”) of the Department of Banking, has investigated and examined the activities of Respondent to determine if it has violated, is violating or is about to violate the provisions of the Connecticut General Statutes or Regulations within the jurisdiction of the Commissioner (“Examination”).

3. As a result of the Examination, the Commissioner has reason to believe that Respondent has violated Sections 36a-53a, 36a-801(e), 36a-801(i), 36a-805(a)(9), 36a-805(a)(12) and 36a-811 of the Connecticut General Statutes.

4. As a result of the Examination, the violations alleged by the Commissioner constitute sufficient grounds to revoke Respondent's consumer collection agency licenses in Connecticut pursuant to Section 36a-804(a) and subsections (a) and (b) of Section 36a-51 of the Connecticut General Statutes.

5. As a result of the Examination, the Commissioner has reason to believe that a basis exists to issue an order to cease and desist against Respondent pursuant to Sections 36a-804(b) and 36a-52(a) of the Connecticut General Statutes.

6. As a result of the Examination, the Commissioner has reason to believe that a basis exists to impose a civil penalty against Respondent pursuant to Sections 36a-804(b) and 36a-50(a) of the Connecticut General Statutes.

## **II. MATTERS ASSERTED**

7. Respondent is a Texas limited partnership with a main office at 2500 Dallas Parkway, Suite 500, Plano, Texas, and a branch office at 12005 Ford Road, Suite 800, Dallas, Texas (Branch ID # 1402631). Since May 1, 1999, Respondent has been licensed to act as a consumer collection agency in Connecticut.

8. At all times relevant hereto, Nathan Levine, NMLS # 958986 ("Levine"), has been the Chief Executive Officer of Respondent.

### **Recent Enforcement Actions**

9. On May 9, 2016, the Federal Trade Commission ("FTC") filed a complaint against Respondent in the United States District Court, Northern District of Texas, Dallas Division (Case No. 3:16-CV-1255) ("Complaint"), alleging, *inter alia*, that Respondent failed to establish and implement reasonable written policies and procedures regarding the accuracy and integrity of consumer information which it reported to consumer reporting agencies and failed to review its existing policies and procedures periodically and update them as necessary to ensure their effectiveness. The Complaint also alleged that Respondent failed to implement reasonable written policies and procedures concerning investigations of direct disputes from consumers under the Fair Credit Reporting Act and failed to complete its investigation of such disputes and report the results of investigations to consumers in a timely manner.

10. On May 10, 2016, Respondent entered into a Stipulated Final Order for Permanent Injunction and Civil Penalty Judgment with the FTC concerning the allegations made in the Complaint (“FTC Final Order”). The FTC Final Order permanently restrained and enjoined Respondent from engaging in the violative activity alleged in the Complaint, and ordered that Respondent pay a civil penalty of \$72,000 and comply with certain related compliance reporting, compliance monitoring and recordkeeping requirements.

11. Respondent’s Corporate Policy and Procedures manual, dated October 9, 2017, indicates that a new section concerning direct disputes was not added until July 10, 2017.

12. On November 17, 2016, a Stipulation and Final Agency Order (“Colorado Order”) was entered into by Respondent and the Administrator of the Colorado Fair Debt Collection Practices Act (“Administrator”). The Colorado Order recited various prior disciplinary actions against Respondent in Colorado, including:

- a. A Letter of Admonition issued on April 7, 1997, for claims related to failure to update collection notices to comply with statutory changes;
- b. A Final Agency Order executed on January 28, 1998, for violation of the April 7, 1997 Letter of Admonition;
- c. A Letter of Admonition issued for claims related to third-party disclosure and recordkeeping violations; and
- d. A Final Agency Order executed on November 12, 2013, for claims related to failure to update collection notices with a new Colorado address.

13. The Colorado Order sought to resolve new concerns relating to a consumer complaint and alleged that Respondent added inappropriate collection fees to consumer accounts, which violated the Colorado Fair Debt Collection Practices Act, and mailed 6,185 collection notices to Colorado consumers which failed to include its local Colorado office information. The Colorado Order required that Respondent cease and desist from engaging in or committing the alleged violative conduct, pay \$9,185 to the order of the Administrator, and issue refunds of any collection fees which were paid by Colorado consumers wherein the underlying contract did not expressly state the collection fee amount.

### **2014 Examination**

14. In August 2014, the Division, along with the states of Idaho, Maine, Massachusetts, North Dakota and Wisconsin (collectively, “2014 Examining States”), conducted a joint examination of Respondent’s consumer collection activities for the period from April 1, 2014 to June 30, 2014 (“2014 Examination”).

15. On September 16, 2015, as a result of the 2014 Examination, the 2014 Examining States issued a Report of Examination (“2014 Report of Examination”) identifying several concerns, including that Respondent failed to have adequate policies and procedures governing its collection practices and handling of consumer complaints, a sufficient collector training program, an adequate system to monitor its collection calls, and a formal compliance audit program. The 2014 Report of Examination also noted several alleged violations, including, but not limited to, that Respondent:

- a. contacted at least one Connecticut debtor after 9:00 p.m., in violation of Section 36a-809-9(d) of the Regulations;
- b. failed to send at least one Connecticut debtor an initial validation notice, as required by Section 36a-809-13 of the Regulations;
- c. failed to provide in its collection letters the Mini-Miranda stating that the consumer collection agency is attempting to collect a debt and that any information obtained will be used for that purpose, and did not state that the letters were from a debt collector, in violation of Section 36a-809-11(11) of the Regulations;
- d. failed to secure trust accounts by providing multiple creditors withdrawal authority to its trust accounts, in violation of Section 36a-811 of the Connecticut General Statutes;
- e. failed to timely remit monies or escheat outstanding checks from its trust account, in violation of Section 36a-805(9) of the Connecticut General Statutes;
- f. charged debtors a \$25 fee for each dishonored check in violation of Section 52-565a of the Connecticut General Statutes, and failed to account for such fees in the debtors payment history, in violation of Section 36a-809-7 of the Regulations;
- g. charged a Connecticut consumer debtor a collection fee of \$17.00 on a debt of \$24.86, which is in excess of 15% of the amount collected, in violation of Section 36a-805(a)(12) of the Connecticut General Statutes;
- h. assessed Connecticut consumer debtors convenience fees for certain methods of payment, in violation of Section 36a-805(a)(12) of the Connecticut General Statutes;

- i. failed to immediately post payments to debtor accounts, in violation of Section 36a-809-7 of the Regulations;
- j. failed to obtain written authorization or similar authentication for preauthorized electronic payments, in violation of federal Regulation E;
- k. failed to provide prior notice to the Commissioner of a change in location of its consumer collection business, in violation of Section 36a-801(i) of the Connecticut General Statutes; and
- l. offered a small loan product to Connecticut consumers in its collection letters, in violation of Section 36a-555 of the 2013 Connecticut General Statutes (now Section 36a-556).

16. By letter dated October 23, 2015, Levine, on behalf of Respondent, made several representations to the 2014 Examining States concerning the allegations made in the 2014 Report of Examination (“2015 Response”), including that:

- a. Respondent’s policy is that all members of the executive team will receive ongoing training relative to applicable laws and regulations no less than twice a year;
- b. Respondent’s consumer complaint process has been formalized and will be utilized companywide on an ongoing basis;
- c. Respondent is developing a formal compliance audit program that will occur semi-annually and all results will be documented and reviewed by the Compliance Department within 30 days of completion;
- d. Management has reviewed the trust account reconciliation process and established procedures to monitor outstanding remittance checks and for accurate, timely filing of unclaimed property in accordance with applicable state escheatment laws; and
- e. Respondent has ceased assessing non-sufficient funds fees and convenience fees to debtors in Connecticut.

### **2017 Examination**

17. On January 30, 2017, this Division, along with the states of Idaho, Maine and Wisconsin (collectively, “2017 Examining States”), commenced a joint examination of Respondent (“2017 Examination”). A report of examination was issued on July 5, 2017, in connection with such examination.

18. The 2017 Examination reviewed Respondent’s consumer collection practices for the period from September 30, 2015 through September 30, 2016, and found that several of the practices cited in the

2014 Report of Examination were still occurring and had not been remedied, and additionally found violations of Connecticut consumer collection agency laws and regulations.

19. Contrary to the claim made in its 2015 Response, as more fully described in paragraph 16.a, above, during the 2017 Examination, examiners were unable to substantiate that all members of the executive team received on-going training relative to applicable laws and regulations at least twice a year. Respondent only provided documentation evidencing that a one-hour training session of the executive team occurred on September 27, 2017, which was outside of the time period of the 2017 Examination and after examiners had concluded such examination.

20. Contrary to the claim made in its 2015 Response, as more fully described in paragraph 16.b, above, the 2017 Examination revealed that Respondent failed to have a formal complaint policy and procedure in place during the examination period. By e-mail dated January 16, 2017, Respondent's Collection Compliance Officer stated to examiners that there was no formal complaint process in place. Respondent's Corporate Policy and Procedures manual indicates that a formal complaint policy and procedure was not created until October 2017, which was outside of the time period of the 2017 Examination and after examiners had concluded such examination.

21. Contrary to the claim made in its 2015 Response, as more fully described in paragraph 16.c, above, the 2017 Examination found that Respondent lacked an independent audit function and failed to prepare written audit reports and track corrective actions. By e-mail dated March 9, 2017, Respondent's Collection Compliance Officer stated to examiners that Respondent did not prepare audit reports for 2015 and 2016. No audit schedule was in place until examiners arrived on site in January 2017.

22. Contrary to the claim made in its 2015 Response, as more fully described in paragraph 16.d, above, the 2017 Examination found that Respondent had over 275 checks that had been outstanding for more than three years, with 149 of them outstanding for more than five years, and failed to follow state laws and Respondent's policies and procedures concerning the timely escheatment of funds to the respective states. By e-mail dated February 2, 2017, Respondent explained the variance: "Due to the

tedious nature and time consuming process of working through the Escheatment process, this policy was not fully implemented due to operating considerations.”

23. Contrary to the claim made in its 2015 Response, as more fully described in paragraph 16.e, above, the 2017 Examination found that Respondent charged consumers convenience fees for certain methods of payment. On January 14, 2015, the Division had issued a memorandum to all Connecticut licensed consumer collection agencies, including Respondent, advising that additional processing or convenience fees for expediting payments to collection agencies made by telephone, credit card, electronic check or debit card are prohibited by Connecticut law.

24. The 2017 Examination found that Respondent convinced at least one Connecticut consumer to pay her collection account to Respondent, even though she had previously paid the account directly with the creditor. This finding is similar to allegations made by the FTC in its Complaint: “In numerous instances, consumers contacted by Respondent have disputed the balances the company is trying to collect. Consumers have told Respondent that they paid the account balances . . . . [C]onsumers have complained that Respondent continued to attempt to collect on inaccurate account information despite multiple disputes.”

25. Similar to the finding from the 2014 Examination, as more fully described in paragraph 15.g, above, the 2017 Examination found that Respondent charged at least one Connecticut debtor a collection fee in excess of 15% of the amount collected. Respondent was unable to produce an agreement or other evidence substantiating this consumer’s debt.

26. The 2017 Examination also found that Respondent failed to timely disclose and upload to the Nationwide Multistate Licensing System and Registry (“NMLS”) the FTC Final Order and Colorado Order. Respondent uploaded the FTC Final Order and Colorado Order to NMLS only after being notified by examiners of such deficiencies on January 30, 2017.

27. In its August 7, 2017 response to the 2017 Report of Examination, Respondent stated that it is the policy of Respondent to be in compliance with each and every regulatory licensing requirement in all the states and jurisdictions in which it operates and that Respondent keeps an active watch over changes

in the state legislatures that would have impact on requirements for licensing. Nonetheless, Respondent failed to comply with state notice requirements as recent as June 2019.

### **2019 Violation**

28. Effective October 1, 2018, Section 36a-801(i) of the Connecticut General Statutes requires that a consumer collection agency licensee provide the Commissioner with notice and a bond rider reflecting a change in location at least thirty (30) calendar days in advance of any such change. Nevertheless, Respondent failed to provide such thirty-day notice of its change of address from 13355 Noel Road, Suite 2100, Dallas, Texas, to 2500 Dallas Parkway, Suite 500, Plano, Texas. In fact, Respondent failed to provide the Commissioner with any prior notice, rather notifying the Commissioner of the address change on June 17, 2019, the same day which the change became effective. As more fully described in paragraph 15.k, above, a similar finding was made in the 2014 Examination. In addition, Respondent did not file a bond rider, endorsement or addendum to the bond reflecting such address change until June 20, 2019, and such bond rider failed to identify the Commissioner as obligee.

### **Opportunity to Show Compliance**

29. On August 26, 2019, pursuant to Section 4-182(c) of the Connecticut General Statutes, the Division provided Respondent an opportunity to show compliance for the retention of its consumer collection agency license in Connecticut.

30. On September 18, 2019, Respondent responded to the Division's August 26, 2019 compliance letter. The Commissioner found such response unpersuasive.

## **III. STATUTORY BASIS FOR ORDER TO REVOKE CONSUMER COLLECTION AGENCY LICENSES, ORDER TO CEASE AND DESIST AND IMPOSITION CIVIL PENALTY**

1. Respondent failed to adequately reconcile its collection trust accounts, as more fully described in paragraphs 15, 16 and 22 of the Matters Asserted, in violation of Section 36a-811 of the Connecticut General Statutes, in effect at such time. Such violation constitutes sufficient grounds to revoke Respondent's consumer collection agency licenses in Connecticut pursuant to Section 36a-804(a)(3) of the

Connecticut General Statutes and subsections (a) and (b) of Section 36a-51 of the Connecticut General Statutes, and forms the basis to issue an order to cease and desist against Respondent pursuant to Sections 36a-804(b)(1) and 36a-52(a) of the Connecticut General Statutes, and to impose a civil penalty against Respondent pursuant to Sections 36a-804(b)(1) 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 Respondent in an amount not to exceed One Hundred Thousand Dollars (\$100,000) per violation.

2. Respondent failed to remit money collected which was not in dispute to clients and escheat unclaimed property in a timely manner, as more fully described in paragraphs 15, 16 and 22 of the Matters Asserted, in violation of Section 36a-805(a)(9) of the Connecticut General Statutes, in effect at such time. Such violations constitute sufficient grounds to revoke Respondent's consumer collection agency licenses pursuant to Section 36a-804(a)(3) of the Connecticut General Statutes and subsections (a) and (b) of Section 36a-51 of the Connecticut General Statutes, and form the basis to issue an order to cease and desist against Respondent pursuant to Sections 36a-804(b)(1) and 36a-52(a) of the Connecticut General Statutes, and to impose a civil penalty against Respondent pursuant to Sections 36a-804(b)(1) 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 Respondent in an amount not to exceed One Hundred Thousand Dollars (\$100,000) per violation.

3. Respondent failed to maintain a contract or other evidence of an agreement substantiating such debt and charged a Connecticut debtor a collection fee in excess of 15% of the amount collected, as more fully described in paragraphs 15 and 25 of the Matters Asserted, in violation of Section 36a-805(a)(12) of the Connecticut General Statutes, in effect at such time. Such violations constitute sufficient grounds to revoke Respondent's consumer collection agency licenses in Connecticut pursuant to Section 36a-804(a)(3) of the Connecticut General Statutes and subsections (a) and (b) of Section 36a-51 of the Connecticut General Statutes, and form the basis to issue an order to cease and desist against Respondent pursuant to Sections 36a-804(b)(1) and 36a-52(a) of the Connecticut General Statutes, and to impose a

civil penalty against Respondent pursuant to Sections 36a-804(b)(1) 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 Respondent in an amount not to exceed One Hundred Thousand Dollars (\$100,000) per violation.

4. Respondent charged consumers convenience fees for certain methods of payment, as more fully described in paragraphs 15, 16 and 23 of the Matters Asserted, in violation of Section 36a-805(a)(12) of the Connecticut General Statutes, in effect at such time. Such violations constitute sufficient grounds to revoke Respondent's consumer collection agency licenses in Connecticut pursuant to Section 36a-804(a)(3) of the Connecticut General Statutes and subsections (a) and (b) of Section 36a-51 of the Connecticut General Statutes, and form the basis to issue an order to cease and desist against Respondent pursuant to Sections 36a-804(b)(1) and 36a-52(a) of the Connecticut General Statutes, and to impose a civil penalty against Respondent pursuant to Sections 36a-804(b)(1) 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 Respondent in an amount not to exceed One Hundred Thousand Dollars (\$100,000) per violation.

5. Respondent failed to update its most recent application filed on NMLS, as more fully described in paragraphs 9 through 13, inclusive, and 26 of the Matters Asserted, in violation of Section 36a-801(e) of the Connecticut General Statutes, in effect at such time. Such violations constitute sufficient grounds to revoke Respondent's consumer collection agency licenses in Connecticut pursuant to Section 36a-804(a)(3) of the Connecticut General Statutes and subsections (a) and (b) of Section 36a-51 of the Connecticut General Statutes, and form the basis to issue an order to cease and desist against Respondent pursuant to Sections 36a-804(b)(1) and 36a-52(a) of the Connecticut General Statutes, and to impose a civil penalty against Respondent pursuant to Sections 36a-804(b)(1) 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 Respondent in an amount not to exceed One Hundred Thousand Dollars (\$100,000) per violation.

6. Respondent made statements to the Commissioner in response to the Department's examination findings, as more fully described in paragraphs 16, 18 through 23, inclusive, 27 and 28 of the Matters Asserted, that were, at the time and in the light of the circumstances under which they were made, false or misleading in a material respect, in violation of Section 36a-53a of the Connecticut General Statutes. Such violations constitute sufficient grounds to revoke Respondent's consumer collection agency licenses in Connecticut pursuant to Section 36a-804(a) of the Connecticut General Statutes and subsections (a) and (b) of Section 36a-51 of the Connecticut General Statutes, and forms the basis to issue an order to cease and desist against Respondent pursuant to Sections 36a-804(b)(1) and 36a-52(a) of the Connecticut General Statutes, and to impose a civil penalty against Respondent pursuant to Sections 36a-804(b)(1) 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 Respondent in an amount not to exceed One Hundred Thousand Dollars (\$100,000) per violation.

7. Respondent failed to provide the Department with thirty (30) calendar days advance notice of a change in location and provide a bond rider, endorsement or addendum to the bond, as more fully described in paragraph 28 of the Matters Asserted, in violation of Section 36a-801(i) of the Connecticut General Statutes. Such violation constitutes sufficient grounds to revoke Respondent's consumer collection agency licenses in Connecticut pursuant to Section 36a-804(a)(3) of the Connecticut General Statutes and subsections (a) and (b) of Section 36a-51 of the Connecticut General Statutes, and forms the basis to issue an order to cease and desist against Respondent pursuant to Sections 36a-804(b)(1) and 36a-52(a) of the Connecticut General Statutes, and to impose a civil penalty against Respondent pursuant to Sections 36a-804(b)(1) 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 Respondent in an amount not to exceed One Hundred Thousand Dollars (\$100,000) per violation.

8. Respondent's conduct, as more fully described in paragraphs 1 through 30, inclusive, of the Matters Asserted, renders the Commissioner unable to determine that the financial responsibility, character, reputation, integrity and general fitness of Respondent are such to warrant belief that the

business will be operated soundly and efficiently, in the public interest and consistent with the purposes of Sections 36a-800 to 36a-814, inclusive, as required pursuant to Section 36a-801(c)(2) of Connecticut General Statutes. Such failure constitutes sufficient grounds for the Commissioner to revoke Respondent's consumer collection agency licenses in Connecticut pursuant to Section 36a-804(a) of the Connecticut General Statutes and subsections (a) and (b) of Section 36a-51 of the Connecticut General Statutes.

**IV. NOTICE OF INTENT TO REVOKE CONSUMER COLLECTION AGENCY LICENSES,  
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 Respondent has engaged in acts or conduct which constitute sufficient grounds for the Commissioner to issue an order to revoke Respondent's consumer collection agency licenses in Connecticut pursuant to Section 36a-804(a) and 36a-804(a)(3) of the Connecticut General Statutes and subsections (a) and (b) of Section 36a-51 of the Connecticut General Statutes, and forms a basis to issue an order to cease and desist against Respondent pursuant to Sections 36a-804(b)(1) and 36a-52(a) of the Connecticut General Statutes and to impose a civil penalty upon Respondent pursuant to Sections 36a-804(b)(1) and 36a-50(a) of the Connecticut General Statutes.

**NOW THEREFORE**, notice is hereby given to Respondent that the Commissioner intends to issue an order to **REVOKE** Respondent's consumer collection agency licenses in Connecticut from its main office, at 2500 Dallas Parkway, Suite 500, Plano, Texas, and from its branch office, at 12005 Ford Road, Suite 800, Dallas, Texas (Branch ID # 1402631), to issue an order requiring Respondent to **CEASE AND DESIST** from violating Sections 36a-53a, 36a-801(e), 36a-801(i), 36a-805(a)(9), 36a-805(a)(12) and 36a-811 of the Connecticut General Statutes, and to impose a **CIVIL PENALTY** upon Respondent as set forth herein, subject to Respondent's right to a hearing on the allegations set forth above.

A hearing will be granted to 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 within fourteen (14) days following Respondent's receipt of this Notice of Intent to Revoke

Consumer Collection Agency Licenses, 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 subsections (a) and (b) of Section 36a-51 of the Connecticut General Statutes, and Sections 36a-52(a) and 36a-50(a) of the Connecticut General Statutes. This Notice of Intent to Revoke Consumer Collection Agency Licenses, 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 the above address. If Respondent will not be represented by an attorney at the hearing, please complete the Appearance and Request for Hearing Form as “pro se”. 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 of Connecticut State Agencies. If a hearing is requested, the hearing will be held on January 21, 2020, at 10 a.m., at the Department of Banking, 260 Constitution Plaza, Hartford, Connecticut.

If a hearing is requested, it will be held in accordance with the provisions of Chapter 54 of the Connecticut General Statutes, unless Respondent fails to appear at the requested hearing. At such hearing, 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.

If Respondent 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 Commissioner will issue an order revoking Respondent’s consumer collection agency licenses in Connecticut from its main office, at 2500 Dallas Parkway, Suite 500, Plano, Texas, and from its branch office, at 12005 Ford Road, Suite 800, Dallas, Texas (Branch ID # 1402631), will issue an order that Respondent cease and desist from violating Sections 36a-53a, 36a-801(e), 36a-801(i), 36a-805(a)(9), 36a-805(a)(12) and 36a-811 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 Respondent.

So ordered at Hartford, Connecticut  
this 14th day of November 2019.

/s/  
\_\_\_\_\_  
Jorge L. Perez  
Banking Commissioner

## CERTIFICATION

I hereby certify that on this 15th day of November 2019, I transmitted the foregoing Notice of Intent to Revoke Consumer Collection Agency Licenses, Notice of Intent to Issue Order to Cease and Desist, Notice of Intent to Impose Civil Penalty and Notice of Right to Hearing to Credit Protection Association, L. P. d/b/a Credit Protection Association, Limited Partnership, Attn: Jeff Davidson, Staff Accountant, and Heather Hinton, Compliance, designated as primary contacts in the contact employee fields on the Nationwide Multistate Licensing System and Registry, at the electronic address provided therein.

/s/  
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Emily B. Bochman  
Paralegal