
IN THE MATTER OF:

SAMANTHA S. FLORES
d/b/a PREMIER LEGAL AND
FINANCIAL SERVICES
a/k/a PREMIER LEGAL & FINANCIAL
GROUP

(“Respondent”)

**NOTICE OF INTENT TO ISSUE
 ORDER TO CEASE AND DESIST**

**NOTICE OF INTENT TO IMPOSE
 CIVIL PENALTY**

AND

NOTICE OF RIGHT TO HEARING

I. LEGAL AUTHORITY AND JURISDICTION

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

3. As a result of the Investigation, the Commissioner has reason to believe that Respondent has violated Section 36a-801(a) of the Connecticut General Statutes and Section 36a-809-11 of the Regulations.

4. As a result of the Investigation, 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.

5. As a result of the Investigation, the Commissioner has reason to believe that a basis exists to issue an order 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

6. Respondent is an individual doing business under the fictitious business names Premier Legal and Financial Services, and Premier Legal & Financial Group. Both fictitious business names are registered by Respondent with the San Bernardino County Clerk's Office. Respondent has a principal address of 12277 Apple Valley Rd Suite 163, Apple Valley, California, and website of <https://www.premierlegalfinancial.com>. Respondent has never been licensed to act as a consumer collection agency in Connecticut.

7. On or about November 5, 2019, a Connecticut resident received a telephone call from Respondent concerning an alleged debt. In particular, Respondent indicated that the Connecticut resident was going to be imminently sued if the Connecticut resident failed to pay \$1,000 to Respondent.

8. Upon requesting validation of the alleged consumer debt from Respondent, the Connecticut resident received a settlement agreement by e-mail on the letterhead of "Premier Legal & Financial Group". The letter stated that payment of \$1,000 was due that same day for debt owed, that Respondent was "retained to arbitrate the outstanding balance owed" on the debt, and that, "[i]f the agreed upon payment for this debt are not made on the agreed upon date, we will proceed to file suit against you"

9. The Connecticut Resident did not make payment to Respondent, and Respondent never sued the Connecticut resident concerning the alleged debt.

10. On December 9, 2019, the Department sent a letter by certified mail, return receipt requested, to Respondent concerning unlicensed consumer collection activity and requested a response within three

weeks of the date of the letter. Respondent received the letter on December 12, 2019, but failed to provide a response to the Department.

III. STATUTORY BASIS FOR ORDER TO CEASE AND DESIST AND IMPOSITION OF CIVIL PENALTY

1. Respondent's acting within this state as a consumer collection agency without a consumer collection agency license, as more fully described in paragraphs 6 through 10, inclusive, of the Matters Asserted, constitutes a violation of Section 36a-801(a) of the Connecticut General Statutes. Such violation forms the basis to issue an order to cease and desist pursuant to Sections 36a-804(b) and 36a-52(a) of the Connecticut General Statutes, and to impose a civil penalty pursuant to Sections 36a-804(b) 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's use of false, deceptive or misleading representations or means in connection with the collection of debt from a Connecticut resident, including representing that the debt was valid and a lawsuit would be filed imminently, as more fully described in paragraphs 6 through 10, inclusive, of the Matters Asserted, constitutes a violation of Section 36a-809-11 of the Regulations of Connecticut State Agencies. Such violation forms the basis to issue an order to cease and desist pursuant to Sections 36a-804(b) and 36a-52(a) of the Connecticut General Statutes, and to impose a civil penalty pursuant to Sections 36a-804(b) 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.

IV. 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 forms a basis 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 and to impose a civil penalty pursuant to Sections 36a-804(b) 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 requiring Respondent to **CEASE AND DESIST** from violating Section 36a-801(a) of the Connecticut General Statutes and Section 36a-809-11 of the Regulations, and to impose a **CIVIL PENALTY** upon Respondent as set forth herein, subject to Respondent's right to a hearing on the allegation 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 or submitted by e-mail to DOB.hearingsupport@ct.gov within fourteen (14) days following Respondent's receipt of this 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 Sections 36a-52(a) and 36a-50(a) of the Connecticut General Statutes. This 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 one of the above-referenced addresses. 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 remotely via videoconference using Microsoft Teams on December 9, 2020, at 10 a.m.

If a hearing is requested, it will be held in accordance with the provisions of Chapter 54 of the Connecticut General Statutes, Executive Order 7B, Section 1, as amended or superseded, and the Remote Hearing Guidelines available on the Department's website at <https://portal.ct.gov/dob>, 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 period prescribed or fails to appear at any such hearing, the allegation herein will be deemed admitted. Accordingly, the Commissioner will issue an order that Respondent cease and desist from violating Section 36a-801(a) of the Connecticut General Statutes and Section 36a-809-11 of the Regulations of Connecticut State Agencies and may order a civil penalty in an amount not to exceed One Hundred Thousand Dollars (\$100,000) per violation be imposed upon Respondent.

Dated at Hartford, Connecticut,
this 10th day of September 2020.

/s/ _____
Jorge L. Perez
Banking Commissioner

CERTIFICATION

I hereby certify that on this 11th day of September 2020, I caused to be mailed by certified mail, return receipt requested, the foregoing Notice of Intent to Issue Order to Cease and Desist, Notice of Intent to Impose Civil Penalty and Notice of Right to Hearing to Samantha S. Flores d/b/a Premier Legal and Financial Services a/k/a Premier Legal & Financial Group: 12277 Apple Valley Rd Suite 163, Apple Valley, CA 92308, Certified Mail No. 7019 1640 0000 1584 8969; 20923 Cayuga Rd, Apple Valley, CA 92308, Certified Mail No. 7019 1640 0000 1584 8945; and 19195 Outer Hwy 18, Apple Valley, CA 92308, Certified Mail No. 7019 1640 0000 1584 8952.

/s/
Carmen Calderon