



4. As a result of the Examination, the violation alleged by the Commissioner constitutes sufficient grounds to revoke Respondent's consumer collection agency license 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 Section 36a-804(b) of the Connecticut General Statutes and Section 36a-52(a) of the 2022 Supplement to the 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 Section 36a-804(b) of the Connecticut General Statutes and Section 36a-50(a) of the 2022 Supplement to the General Statutes.

7. Section 36a-802(a) of the Connecticut General Statutes requires that a consumer collection agency licensee maintain a bond that runs concurrently with the period of the license.

8. The Commissioner has reason to believe that as of November 11, 2021, Respondent failed to have a bond in place as required by Section 36a-802(a) of the Connecticut General Statutes. As a result, the Commissioner finds that sufficient grounds exist for the automatic suspension of Respondent's consumer collection agency license in Connecticut effective November 11, 2021, and to revoke Respondent's consumer collection agency license in Connecticut pursuant to Section 36a-804(a) and subsections (a) and (b) of Section 36a-51 of the Connecticut General Statutes.

## **II. MATTERS ASSERTED**

9. Respondent is a Florida corporation with a main office at 8395 Philadelphia Avenue, Spring Hill, Florida ("Main Office"). At all times relevant hereto, Respondent was licensed by the Commissioner through the Nationwide Multistate Licensing System and Registry ("NMLS") to act as a consumer collection agency in Connecticut.

10. Pursuant to Sections 36a-17(a) and 36a-801 of the Connecticut General Statutes in effect at such time, the Consumer Credit Division ("Division") conducted an examination of Respondent's collection activity in Connecticut. On October 15, 2020, the Division sent an e-mail to Respondent's

primary company contact on NMLS requesting information pertaining to the amount of collections activity conducted in Connecticut, “collectr@snet.net”. After no response, a follow up e-mail was sent on January 22, 2021, and again no response was received. On April 7, 2021, the Division posted a deficiency license item to NMLS requesting the same information. Another attempt was made to contact Respondent on August 19, 2021, at the phone numbers provided by Respondent on NMLS. The Division left a voicemail on one line, however the other phone numbers provided were out of service or not able to receive messages.

11. On August 25, 2021, the Division issued a compliance letter detailing the attempts made to obtain the information and provided Respondent an opportunity to show compliance with legal requirements for the retention of its consumer collection agency in Connecticut, pursuant to Section 36a-17(e) of the Connecticut General Statutes in effect at such time. The letter was sent via certified mail, return receipt requested, to 7415 Granada Ave New Port Richey, Florida, and 8395 Philadelphia Ave, Spring Hill, Florida, with a copy to the agent of record at 57 Pratt St, Hartford, Connecticut. It was also sent electronically to the e-mail address provided on NMLS. Respondent failed to respond to the letter.

#### **Bond Cancellation**

12. On September 14, 2021, the Commissioner received notice from Platte River Insurance Company that surety bond number 41271321, issued on behalf of Respondent with respect to its consumer collection agency license, would be cancelled effective November 11, 2021.

13. On November 10, 2021, pursuant to Section 4-182(c) of the Connecticut General Statutes, the Division informed Respondent by e-mail to Respondent’s primary company contact of the notice of cancellation and provided Respondent an opportunity to show compliance with all lawful requirements for the retention of its consumer collection agency license in Connecticut.

14. As of November 19, 2021, Respondent failed to file with the Commissioner a letter of reinstatement of the bond, a new bond or request to surrender its license in Connecticut.

15. As a result, the Commissioner automatically suspended Respondent's consumer collection agency license in Connecticut effective November 11, 2021.

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

16. Respondent failed to provide information requested during the Examination, as more fully described in paragraphs 9 through 11, inclusive, in violation of Section 36a-17(e) of the Connecticut General Statutes in effect at such time. Such violation constitutes sufficient grounds to revoke Respondent's consumer collection agency license 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 pursuant to Section 36a-804(b) of the Connecticut General Statutes and Section 36a-52(a) of the 2022 Supplement to the General Statutes, and impose a civil penalty pursuant to Section 36a-804(b) of the Connecticut General Statutes and Section 36a-50(a) of the 2022 Supplement to the General Statutes. Section 36a-50(a) of the 2022 Supplement to the 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.

17. Respondent's conduct, as more fully described in paragraphs 9 through 11, inclusive, 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 in effect at such time. Such failure constitutes sufficient grounds for the Commissioner to revoke Respondent's consumer collection agency license 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 form the basis to issue an order to cease and desist pursuant to Section 36a-804(b) of the Connecticut General Statutes and Section 36a-52(a) of the 2022 Supplement to the General Statutes, and impose a civil penalty pursuant to Section 36a-804(b) of the Connecticut General Statutes and Section 36a-50(a) of the 2022

Supplement to the General Statutes. Section 36a-50(a) of the 2022 Supplement to the 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.

18. Respondent's failure to maintain a surety bond that runs concurrently with the period of its consumer collection agency license, as more fully described in paragraphs 12 through 15, inclusive, constitutes sufficient grounds for the Commissioner to deny an application for such license under Section 36a-802(a) of the Connecticut General Statutes and constitutes sufficient grounds for the Commissioner to revoke Respondent's license to act as a consumer collection agency in Connecticut from its Main Office 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 form the basis to issue an order to cease and desist pursuant to Section 36a-804(b) of the Connecticut General Statutes and Section 36a-52(a) of the 2022 Supplement to the General Statutes, and impose a civil penalty pursuant to Section 36a-804(b) of the Connecticut General Statutes and Section 36a-50(a) of the 2022 Supplement to the General Statutes. Section 36a-50(a) of the 2022 Supplement to the 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 AUTOMATIC SUSPENSION, NOTICE OF INTENT TO REVOKE CONSUMER COLLECTION AGENCY LICENSE, 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 constitutes sufficient grounds for the Commissioner to issue an order to revoke Respondent's consumer collection agency license 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 a basis to issue an order to cease and desist against Respondent pursuant to Section 36a-804(b) of the Connecticut General Statutes and Section 36a-52(a) of the 2022 Supplement to the

General Statutes, and to impose a civil penalty upon Respondent pursuant to Section 36a-804(b) of the Connecticut General Statutes and Section 36a-50(a) of the 2022 Supplement to the General Statutes.

**NOW THEREFORE**, pursuant to the authority granted in Section 36a-802(b) of the Connecticut General Statutes, the Commissioner gives **NOTICE** that on November 11, 2021, the license of CONNECTICUT MEDICAL FINANCIAL SERVICES, INC. d/b/a C.M. FINANCIAL SERVICES INC to act as a consumer collection agency in Connecticut from its main office, at 8395 Philadelphia Avenue, Spring Hill, Florida, was **AUTOMATICALLY SUSPENDED** pending proceedings for revocation.

**FURTHER**, notice is hereby given to Respondent that the Commissioner intends to issue an order to **REVOKE** Respondent's consumer collection agency license in Connecticut from its Main Office, to issue an order requiring Respondent to **CEASE AND DESIST** from violating Section 36a-17(e) of the 2022 Supplement to the 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 or submitted by e-mail to [DOB.hearingsupport@ct.gov](mailto:DOB.hearingsupport@ct.gov) within fourteen (14) days following Respondent's receipt of this Notice of Automatic Suspension, Notice of Intent to Revoke Consumer Collection Agency License, 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 2022 Supplement to the General Statutes. This Notice of Automatic Suspension, Notice of Intent to Revoke Consumer Collection Agency License, 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". Respondent may request that the hearing be held in person at the

Department's offices or remotely via videoconference using Microsoft Teams. 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 July 12, 2022, 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, 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. Any remote hearing will be held in accordance with Section 149 of June Special Session Public Act 21-2, and the Remote Hearing Guidelines available on the Department's website at <https://portal.ct.gov/dob>.

If Respondent does not request a hearing within the time period 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 license in Connecticut from its Main Office at 8395 Philadelphia Avenue, Spring Hill, Florida, will issue an order that Respondent cease and desist from violating Section 36a-17(e) of the 2022 Supplement to the 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 4th day of May 2022.

/s/  
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Jorge L. Perez  
Banking Commissioner

**CERTIFICATION**

I hereby certify that on this 5th day of May 2022, I caused to be mailed by certified mail, return receipt requested, the foregoing Notice of Automatic Suspension, Notice of Intent to Revoke, Notice of Intent to Issue Order to Cease and Desist, Notice of Intent to Impose Civil Penalty and Notice of Right to Hearing to CONNECTICUT MEDICAL FINANCIAL SERVICES, INC. d/b/a C.M. FINANCIAL SERVICES INC, 7415 Granada Ave, New Port Richey, Florida 34653, Certified Mail No. 70202450000070267295, and 8395 Philadelphia Ave, Spring Hill, Florida 34608, Certified Mail No. 70191640000015878003, with a copy to its registered agent, Nellie Akalp, Incorporator, National Registered Agents Inc, 57 Pratt St Hartford, Connecticut 06103, Certified Mail No. 70202450000070267271.

/s/  
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Emily B. Bochman  
Paralegal Specialist