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**IN THE MATTER OF:** \*  
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**RADIUS GLOBAL SOLUTIONS LLC** \*  
**NMLS # 936423** \*  
\*  
**(“RGS”)** \*  
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**CONSENT ORDER**

**WHEREAS**, 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”);

**WHEREAS**, RGS is a Minnesota limited liability company with an office located at 7831 Glenroy Road, #250, Edina, Minnesota;

**WHEREAS**, RGS has been licensed as a consumer collection agency in Connecticut since September 3, 1996;

**WHEREAS**, the Commissioner, through the Consumer Credit Division of the Department of Banking, conducted a multi-state examination pursuant to Section 36a-17 of the Connecticut General Statutes, in effect at such time, into the activities of RGS to determine if it had violated, was violating or was about to violate the provisions of the Connecticut General Statutes and Regulations within the jurisdiction of the Commissioner;

**WHEREAS**, the review of the collection activities of RGS covered the period from April 1, 2020 through March 31, 2021;

**WHEREAS**, as a result of such examination, the Commissioner alleges that RGS conducted collection activity at an overseas location, in violation of Section 36a-801(a) of the Connecticut General Statutes in effect at such time;

**WHEREAS**, the Commissioner believes that such allegation would support the initiation of enforcement proceedings against RGS, including, without limitation, proceedings to issue a cease and desist order 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 an order imposing a civil penalty of up to One Hundred Thousand Dollars (\$100,000) per violation pursuant to Section 36a-804(b) of the Connecticut General Statutes and Section 36a-50(a) of the 2022 Supplement to the General Statutes;

**WHEREAS**, initiation of such enforcement proceedings would constitute a “contested case” within the meaning of Section 4-166(4) of the Connecticut General Statutes;

**WHEREAS**, Section 4-177(c) of the Connecticut General Statutes and Section 36a-1-55(a) of the Regulations of Connecticut State Agencies provide that a contested case may be resolved by consent order, unless precluded by law;

**WHEREAS**, the Commissioner and RGS acknowledge the possible consequences of formal administrative proceedings, and RGS voluntarily agrees to consent to the entry of the sanctions imposed below solely for the purpose of obviating the need for formal administrative proceedings concerning the allegation set forth herein;

**WHEREAS**, the Commissioner and RGS, without admitting or denying any allegation contained herein, now desire to resolve the matters set forth herein;

**WHEREAS**, during the review of its collection practices with the Commissioner, RGS represented to the Commissioner that: (1) RGS believed it had adequate policies and procedures in place at the time the violation occurred that were designed to prevent RGS from contacting Connecticut consumers from an overseas location, and (2) RGS never intended to conduct collection activity directed at Connecticut consumers from an overseas location;

**WHEREAS**, RGS represents to the Commissioner that it has implemented an enhanced precautionary system to prevent it from conducting consumer collection activity for Connecticut consumers from an overseas branch;

**WHEREAS**, RGS specifically assures the Commissioner that the violation alleged herein shall not occur in the future;

**WHEREAS**, RGS acknowledges that this Consent Order is a public record and is a reportable event for purposes of the regulatory disclosure questions on the Nationwide Multistate Licensing System and Registry (“NMLS”), as applicable;

**AND WHEREAS**, RGS, through its execution of this Consent Order, voluntarily agrees to waive its procedural rights, including a right to a notice and an opportunity for a hearing as it pertains to the allegation set forth herein, and voluntarily waives its right to seek judicial review or otherwise challenge or contest the validity of this Consent Order.

#### **CONSENT TO ENTRY OF SANCTIONS**

**WHEREAS**, RGS, through its execution of this Consent Order, consents to the Commissioner’s entry of a Consent Order imposing the following sanctions:

1. No later than the date this Consent Order is executed by RGS, it shall remit to the Department of Banking by electronic funds transfer, cashier’s check, certified check or money order made payable to “Treasurer, State of Connecticut”, the sum of Ten Thousand Dollars (\$10,000) as a civil penalty; and
2. RGS shall cease and desist from conducting collection activity for Connecticut consumers from an overseas branch, in violation of Section 36a-801(a) of the Connecticut General Statutes.

#### **CONSENT ORDER**

**NOW THEREFORE**, the Commissioner enters the following:

1. The Sanctions set forth above be and are hereby entered;
2. Upon issuance of this Consent Order by the Commissioner, this matter will be resolved and the Commissioner will not take any future enforcement action against RGS based upon the allegation set forth herein; provided that issuance of this Consent Order is without prejudice to the right of the Commissioner to take enforcement action against RGS based upon a violation of this Consent Order or the matters underlying its entry, if the Commissioner determines that

compliance with the terms herein is not being observed or if any representation made by RGS and reflected herein is subsequently discovered to be untrue;

3. RGS shall not take any action or make or permit to be made any public statement, including in regulatory filings, any proceeding in any forum or otherwise, denying, directly or indirectly, any allegation referenced in this Consent Order or create the impression that this Consent Order is without factual basis. Except as specifically provided herein, RGS shall not take any position in any proceeding brought by or on behalf of the Commissioner, or to which the Commissioner is a party, that is inconsistent with any part of this Consent Order. Nothing in this provision affects RGS's (i) testimonial obligations, or (ii) right to take any legal or factual position that may contradict an allegation in this Consent Order in litigation or other legal proceedings in which the Commissioner is not a party;
4. Subject to the foregoing, and so long as this Consent Order is promptly disclosed by RGS and its control persons on NMLS, as applicable, nothing in the issuance of this Consent Order shall adversely affect the ability of RGS to apply for or obtain licenses or renewal licenses under Part XII of Chapter 669, Sections 36a-800 to 36a-814, inclusive, of the Connecticut General Statutes, provided that all applicable legal requirements for any such license are satisfied and the terms of this Consent Order are being followed;
5. This Consent Order shall be binding upon RGS and its successor and assigns; and
6. This Consent Order shall become final when issued.

Issued at Hartford, Connecticut  
this 6th day of January 2023.

/s/  
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Jorge L. Perez  
Banking Commissioner

I, Greg Stevens, state on behalf of Radius Global Solutions LLC, that I have read the foregoing Consent Order; that I know and fully understand its contents; that I am authorized to execute this Consent Order on behalf of Radius Global Solutions LLC; that Radius Global Solutions LLC agrees freely and without threat or coercion of any kind to comply with the sanctions entered herein; and that Radius Global Solutions LLC voluntarily agrees to enter into this Consent Order, expressly waiving the procedural rights set forth herein as to the matters described herein.

By: /s/  
Name: Greg Stevens  
Title: Chief Compliance Officer  
Radius Global Solutions LLC

State of: Florida

County of: Pasco

On this 29 day of December 2022, before me, Josiah DeFillipo, the undersigned officer, personally appeared Greg Stevens, who acknowledged himself/herself to be the Chief Compliance Officer of Radius Global Solutions LLC, a member managed/manager managed limited liability company, and that he/she as such Chief Compliance Officer, being authorized so to do, executed the foregoing instrument for the purposes therein contained, by signing the name of the limited liability company by himself/herself as

\_\_\_\_\_.

In witness whereof I hereunto set my hand.

/s/  
Notary Public: Josiah DeFillipo  
My Commission Expires: Jan 10, 2026