
IN THE MATTER OF:

CETERIS PORTFOLIO SERVICES, LLC
d/b/a NORTH SHORE AGENCY
d/b/a SRA ASSOCIATES
NMLS # 1805652

(“Ceteris”)

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, Ceteris is a Delaware limited liability company with an office located at 112 West Park Drive, Suite 200, Mount Laurel, New Jersey;

WHEREAS, North Shore Agency, LLC, NMLS # 995479 (“NSA”), was licensed to act as a consumer collection agency in Connecticut from July 2, 2013 until January 1, 2019, when such license expired;

WHEREAS, SRA Associates, LLC, NMLS # 877896 (“SRA”), was licensed to act as a consumer collection agency in Connecticut from August 10, 2000 until January 1, 2019, when such license expired;

WHEREAS, in October 2018, NSA and SRA each went through a foreclosure of assets;

WHEREAS, in October 2018, a company related to Ceteris purchased assets from NSA and SRA, and such assets were transferred to Ceteris;

WHEREAS, on December 28, 2018, Ceteris applied to act as a consumer collection agency in Connecticut, which application is currently pending;

WHEREAS, Ceteris operates under the fictitious names “SRA Associates” and “North Shore Agency” in this state;

WHEREAS, the Department of Banking has received one consumer complaint regarding Ceteris conducting consumer collection activity under the afore-mentioned trade names without a license in this state between April and May 2019;

WHEREAS, on July 26, 2019, Ceteris registered the fictitious names “SRA Associates” and “North Shore Agency” on the Nationwide Multistate Licensing System and Registry (“NMLS”);

WHEREAS, the Commissioner, through the Consumer Credit Division of the Department of Banking, acting pursuant to Section 36a-17 of the Connecticut General Statutes, investigated the activities of Ceteris 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 (“Investigation”);

WHEREAS, cooperating with the Commissioner during the Investigation, Ceteris disclosed that it had conducted unlicensed consumer collection activity in Connecticut between January and June 2019;

WHEREAS, as a result of the Investigation, the Commissioner alleges that between January and June 2019, Ceteris acted as a consumer collection agency in Connecticut without a consumer collection agency license, in violation of Section 36a-801(a) of the Connecticut General Statutes;

WHEREAS, the Commissioner believes that such allegation would support the initiation of enforcement proceedings against Ceteris, including, without limitation, proceedings to issue an order to cease and desist against Ceteris pursuant to Sections 36a-804(b) and 36a-52(a) of the Connecticut General Statutes, and to impose a civil penalty of up to One Hundred Thousand Dollars (\$100,000) per violation upon Ceteris pursuant to Sections 36a-804(b) and 36a-50(a) of the Connecticut 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 Ceteris, without admitting or denying any allegation contained herein, now desire to resolve the matters set forth herein;

WHEREAS, both the Commissioner and Ceteris acknowledge the possible consequences of formal administrative proceedings, and Ceteris 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, Ceteris specifically assures the Commissioner that the violation alleged herein shall not occur in the future;

WHEREAS, Ceteris acknowledges that this Consent Order is a public record and is a reportable event for purposes of NMLS, as applicable;

AND WHEREAS, Ceteris, 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, Ceteris, 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 Ceteris, it shall remit to the Department of Banking by wire 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. Ceteris shall cease and desist from acting as a consumer collection agency in this state without a license, 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 Ceteris 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 Ceteris 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 Ceteris and reflected herein is subsequently discovered to be untrue;
3. Ceteris shall not take any action or make or permit to be made any public statement, including in regulatory filings 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;
4. Subject to the foregoing, and so long as this Consent Order is promptly disclosed by Ceteris and its control persons on NMLS, as applicable, nothing in the issuance of this Consent Order shall adversely affect the ability of Ceteris 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 Ceteris and its successor and assigns; and
6. This Consent Order shall become final when issued.

Issued at Hartford, Connecticut
this 7th day of April 2020.

_____/s/_____
Jorge L. Perez
Banking Commissioner

I, Jonathan Pike, state on behalf of Ceteris Portfolio Services, LLC d/b/a North Shore Agency d/b/a SRA Associates, 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 Ceteris Portfolio Services, LLC d/b/a North Shore Agency d/b/a SRA Associates; that Ceteris Portfolio Services, LLC d/b/a North Shore Agency d/b/a SRA Associates agrees freely and without threat or coercion of any kind to comply with the sanctions entered herein; and that Ceteris Portfolio Services, LLC d/b/a North Shore Agency d/b/a SRA Associates 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: Jonathan Pike
Title: President
Ceteris Portfolio Services, LLC
d/b/a North Shore Agency
d/b/a SRA Associates

State of: Missouri

County of: Clay

On this the 26 day of March 2020, before me, Jonathan Pike, the undersigned officer, personally appeared Jonathan Pike, who acknowledged himself to be the President of Ceteris Portfolio Services, LLC d/b/a North Shore Agency d/b/a SRA Associates, a limited liability company, and that he as such President, 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 as President.

In witness whereof I hereunto set my hand.

_____/s/
Notary Public Sheri Lynn Kennedy
Date Commission Expires: October 14, 2022