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 \*  
**IN THE MATTER OF:** \*  
 \*  
**SAMANTHA S. FLORES** \*  
**d/b/a PREMIER LEGAL AND** \*  
**FINANCIAL SERVICES** \*  
**a/k/a PREMIER LEGAL & FINANCIAL** \*  
**GROUP** \*  
 \*  
 (“Respondent”) \*  
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**ORDER TO CEASE AND DESIST**  
 AND  
**ORDER IMPOSING CIVIL PENALTY**

**I. PRELIMINARY STATEMENT**

**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**, the Commissioner, through the Consumer Credit Division of the Department of Banking, conducted an investigation of the activities of Respondent, pursuant to the authority granted by Section 36a-17 of the Connecticut General Statutes, to determine if she had violated, was violating or was about to violate the provisions of the Connecticut General Statutes or Regulations within the jurisdiction of the Commissioner;

**WHEREAS**, as a result of such investigation, on September 10, 2020, the Commissioner, issued a Notice of Intent to Issue Order to Cease and Desist, Notice of Intent to Impose Civil Penalty and Notice of Right to Hearing (collectively “Notice”) against Respondent, which Notice is incorporated herein by reference;

**WHEREAS**, on September 11, 2020, the Notice was caused to be mailed by certified mail, return receipt requested, to Respondent (Certified Mail Nos. 70191640000015848969, 70191640000015848945 and 70191640000015848952);

**WHEREAS**, the Notice provided Respondent with the opportunity for a hearing, and stated that if a hearing was not requested by Respondent within 14 days of its receipt, the Commissioner would 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, and may order a civil penalty in an amount not to exceed One Hundred Thousand Dollars (\$100,000) per violation be imposed upon Respondent;

**WHEREAS**, on September 17, 2020, Respondent received the Notice;

**WHEREAS**, Respondent failed to request a hearing within the prescribed time period;

**WHEREAS**, the Commissioner alleged in the Notice, with respect to the activity described therein, that Respondent's acting within this state as a consumer collection agency without a consumer collection agency license 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;

**WHEREAS**, the Commissioner further alleged in the Notice, with respect to the activity described therein, that 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, constitutes a violation of Section 36a-809-11 of the Regulations. 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;

**WHEREAS**, Section 36a-52(a) of the Connecticut General Statutes provides, in pertinent part, that "[i]f the person does not request a hearing within the time specified in the notice or fails to appear at the

hearing, the commissioner shall issue an order to cease and desist against the person. No such order shall be issued except in accordance with the provisions of chapter 54”;

**WHEREAS**, Section 36a-50(a)(2) of the Connecticut General Statutes provides, in pertinent part, that “[i]f such person does not request a hearing within the time specified in the notice or fails to appear at the hearing, the commissioner may, as the facts require, order that a civil penalty not exceeding one hundred thousand dollars per violation be imposed upon such person”;

**WHEREAS**, Section 36a-50(a)(3) of the Connecticut General Statutes provides that “[e]ach action undertaken by the commissioner under this subsection shall be in accordance with the provisions of chapter 54”;

**AND WHEREAS**, Section 36a-1-31(a) of the Regulations provides, in pertinent part, that “[w]hen a party fails to request a hearing within the time specified in the notice, the allegations against the party may be deemed admitted. Without further proceedings or notice to the party, the commissioner shall issue a final decision in accordance with section 4-180 of the Connecticut General Statutes and section 36a-1-52 of the Regulations of Connecticut State Agencies”.

## **II. FINDINGS OF FACT AND CONCLUSIONS OF LAW**

1. The Commissioner finds that the matters asserted, as set forth in paragraphs 6 through 10, inclusive, of Section II of the Notice, shall constitute findings of fact within the meaning of Section 4-180(c) of the Connecticut General Statutes, and that the conclusions, as set forth in paragraphs 1 and 2 of Section III of the Notice, shall constitute conclusions of law within the meaning of Section 4-180(c) of the Connecticut General Statutes and Section 36a-1-52 of the Regulations.

2. The Commissioner finds that Respondent has engaged in acts or conduct which, pursuant to Sections 36a-804(b) and 36a-52(a) of the Connecticut General Statutes, forms the basis to issue an order to cease and desist against Respondent, and, pursuant to Sections 36a-804(b) and 36a-50(a) of the Connecticut General Statutes, forms the basis to impose a civil penalty upon Respondent.

3. The Commissioner finds that the Notice was given in compliance with Sections 36a-52(a), 36a-50(a) and 4-177 of the Connecticut General Statutes.

### III. ORDER

Having read the record, **I HEREBY ORDER**, pursuant to Sections 36a-804(b), 36a-52(a) and 36a-50(a) of the Connecticut General Statutes, that:

1. Samantha S. Flores d/b/a Premier Legal and Financial Services a/k/a Premier Legal & Financial Group **CEASE AND DESIST** from violating Section 36a-801(a) of the Connecticut General Statutes and Section 36a-809-11 of the Regulations;
2. A **CIVIL PENALTY** of Two Hundred Thousand Dollars (\$200,000) be imposed upon Samantha S. Flores d/b/a Premier Legal and Financial Services a/k/a Premier Legal & Financial Group, to be remitted to the Department of Banking by wire transfer, cashier's check, certified check or money order, made payable to "Treasurer, State of Connecticut", no later than thirty (30) days from the date this Order is mailed; and
3. This Order shall become effective when mailed.

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

/s/  
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Jorge L. Perez  
Banking Commissioner

This Order was sent by certified mail,  
return receipt requested, to  
Respondent on November 13, 2020.

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 8471

Samantha S. Flores  
d/b/a Premier Legal and  
Financial Services  
a/k/a Premier Legal & Financial Group  
20923 Cayuga Rd  
Apply Valley, CA 92308

Certified Mail No. 7019 1640 0000 1584 8488

Samantha S. Flores  
d/b/a Premier Legal and  
Financial Services  
a/k/a Premier Legal & Financial Group  
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