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 IN THE MATTER OF:
 YES ONLINE INC
 d/b/a DYNAMIC LEGAL
 RECOVERY
 d/b/a YES ONLINE INC
 NMLS # 1431632

 (“Respondent”)

ORDER OF SUMMARY SUSPENSION

**TEMPORARY ORDER TO CEASE
 AND DESIST**

**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

I. PRELIMINARY STATEMENT

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 in effect at such time, the Commissioner, through the Consumer Credit Division (“Division”) of the Department of Banking, attempted to investigate and examine the activities of Respondent to determine if it has violated, is violating or is about to violate the provisions of the Connecticut General Statutes or Regulations within the jurisdiction of the Commissioner (“Examination”).

3. As more fully described below in paragraphs 6 through 10, inclusive, of the Matters Asserted, Respondent failed to provide the information requested and necessary to conduct the Examination. As a result, the Commissioner alleges that Respondent violated Section 36a-17(e) of the Connecticut General Statutes, and that sufficient grounds exist to summarily suspend Respondent's consumer collection agency license in Connecticut pursuant to subsection (a) of Section 36a-51 of the Connecticut General Statutes and to issue a temporary order to cease and desist against Respondent pursuant to subsection (b) of Section 36a-52 of the Connecticut General Statutes.

4. Furthermore, as a result of such conduct, the Commissioner has reason to believe that a basis exists 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, issue an order to cease and desist against Respondent pursuant to Section 36a-52(a) of the Connecticut General Statutes, as amended by Public Act 21-130, and impose a civil penalty against Respondent pursuant to Section 36a-50(a) of the Connecticut General Statutes, as amended by Public Act 21-130.

II. MATTERS ASSERTED

5. Respondent is a California corporation with a main office at 25600 Rye Canyon Road Suite 209, Santa Clarita, California. Since December 19, 2019, Respondent has been licensed to act as a consumer collection agency in Connecticut.

6. On September 7, 2021, the Division commenced an Examination of Respondent through an Information Request submitted on the State Examination System with a due date of September 27, 2021, ("Information Request"). Respondent failed to provide all of the information requested by September 27, 2021.

7. On October 1, 2021, the Division sent a follow-up e-mail concerning the information requested and not yet received. On October 4, 2021, Respondent replied, stating "The examination is almost complete. The person who will provide some of the info has been out sick but is back working now. I hope to have the examination to you in just a few days."

8. On October 14, 2021, the Division sent another follow-up e-mail concerning the information requested and not yet received. Respondent replied the same day, stating “Yes Online is going to surrender our collection license in the state of Connecticut. The examination is close to being complete, however the remaining information that we are trying to gather is more time consuming than anticipated, and we’ve deemed the time spent researching and gathering this information along with doing this examination again in the future is not cost effective considering our low collections in the state.”

9. On October 15, 2021, the Division responded that the Examination must be completed before it would consider accepting the surrender of Respondent’s consumer collection agency license.

10. As of November 30, 2021, the Division has been unable to complete its Examination because Respondent has failed to provide a significant amount of the information requested via the Information Request, including but not limited to:

- A list of all clients/creditors on whose behalf contact was made with consumer debtors during the review period;
- All scripts, templates, disclosures, letters, e-mails, texts and other materials that are used by collectors when communicating with Connecticut consumers or sent to Connecticut consumers;
- An Excel spreadsheet of all Connecticut consumer debtor accounts during the review period, including debtor account number, debtor name, debtor address and original creditor;
- Recordings of actual calls to Connecticut consumer debtors;
- A listing of all consumer lawsuits filed against the agency within the review period, or that were filed earlier but have not been resolved;
- A listing of all complaints received from consumers and attorneys on behalf of consumers; and
- A list of all vendors contracted by the agency.

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

1. Respondent failed to provide records requested during the Examination or to otherwise cooperate with the Commissioner, as more fully described in paragraphs 6 through 10, inclusive, of the Matters Asserted, in violation of Section 36a-17(e) of the Connecticut General Statutes. Such violation constitutes sufficient grounds to revoke Respondent's license to act as a consumer collection agency 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, forms the basis to issue an order to cease and desist against Respondent pursuant to Section 36a-52(a) of the Connecticut General Statutes, as amended, and to impose a civil penalty against Respondent pursuant to Section 36a-50(a) of the Connecticut General Statutes, as amended. Section 36a-50(a) of the Connecticut General Statutes, as amended, 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 conduct, as more fully described in paragraphs 6 through 10, inclusive, of the Matters Asserted, 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, as amended by Public Act 21-138. Such failure constitutes sufficient grounds for the Commissioner to deny an application for such license and, in turn, constitutes sufficient grounds for the Commissioner to revoke Respondent's license to act as a consumer collection agency 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.

**IV. FINDINGS AND STATUTORY BASIS FOR ORDER OF SUMMARY
SUSPENSION AND TEMPORARY ORDER TO CEASE AND DESIST**

The Commissioner finds that the public safety and welfare imperatively require emergency action to summarily suspend Respondent's license to act as a consumer collection agency in Connecticut pursuant to Sections 36a-51(a) and 4-182(c) of the Connecticut General Statutes, and finds that the public welfare requires immediate action to issue a temporary order requiring Respondent to cease and desist from violating the law cited herein, pursuant to Section 36a-52(b) of the Connecticut General Statutes, to prevent potential harm to Connecticut consumer debtors as a result Respondent's failure to cooperate in the Department's Examination and provide the necessary records for the Commissioner to effectively supervise Respondent's consumer collection activities in Connecticut.

**V. ORDER OF SUMMARY SUSPENSION, TEMPORARY ORDER TO CEASE AND
DESIST, NOTICE OF INTENT TO ISSUE ORDER TO CEASE AND DESIST, NOTICE OF
INTENT TO REVOKE CONSUMER COLLECTION AGENCY LICENSE, 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 revoke Respondent's license to act as a consumer collection agency in Connecticut pursuant to Sections 36a-804(a) and subsections (a) and (b) of Section 36a-51 of the Connecticut General Statutes, forms a basis to issue an order to cease and desist pursuant to Section 36a-52(a) of the Connecticut General Statutes, as amended, and to impose a civil penalty pursuant to Section 36a-50(a) of the Connecticut General Statutes, as amended;

AND WHEREAS, the Commissioner has made the findings required under Sections 36a-52(b), 36a-51(a) and 4-182(c) of the Connecticut General Statutes.

NOW THEREFORE, pursuant to the authority granted in Sections 36a-804(a), 36a-51(a) and 4-182(c) of the Connecticut General Statutes, the Commissioner **ORDERS** that the license of Yes Online Inc d/b/a Dynamic Legal Recovery d/b/a YES ONLINE INC to act as a consumer collection agency in Connecticut be and is hereby **SUMMARILY SUSPENDED** pending proceedings to revoke its license.

THE COMMISSIONER FURTHER ORDERS, pursuant to the authority granted in Section 36a-52(b) of the Connecticut General Statutes, that Yes Online Inc d/b/a Dynamic Legal Recovery d/b/a YES ONLINE INC immediately **CEASE AND DESIST** from further violations of Section 36a-17(e) of the Connecticut General Statutes. This Temporary Order to Cease and Desist shall become effective upon receipt by Yes Online Inc d/b/a Dynamic Legal Recovery d/b/a YES ONLINE INC and, unless set aside or modified by a court, shall remain in effect until the effective date of a permanent order or dismissal of the matters asserted in this Temporary Order to Cease and Desist.

THE COMMISSIONER FURTHER ORDERS, pursuant to Sections 36a-51(a) and 36a-52(b) of the Connecticut General Statutes, that Yes Online Inc d/b/a Dynamic Legal Recovery d/b/a YES ONLINE INC shall take the following actions:

1. Upon receipt of this Temporary Order to Cease and Desist, Respondent and any and all officers, directors, trustees, principal employees, shareholder and agents acting on its behalf, shall immediately cease and desist from acting as a consumer collection agency in this state, provided that Respondent is permitted to perform the winding down of its Connecticut consumer collection activities as provided herein;
2. No later than fourteen (14) days after receipt of this Temporary Order to Cease and Desist, Respondent shall perform a detailed accounting of all Connecticut consumer debtor accounts, including but not limited to, names and addresses of Connecticut consumer debtors and the amount of funds and fees collected from each consumer debtor, and provide copies of such detailed accounting to: (a) all clients that currently have Connecticut consumer debtor accounts placed with Respondent (“CT Clients”), and (b) the Division;
3. No later than fourteen (14) days after receipt of this Temporary Order to Cease and Desist, Respondent shall perform a detailed accounting of its trust account for CT Clients and ensure that only monies due to CT Clients are held in such account. Evidence of such accounting shall be provided to the Division;
4. Upon receipt of this Temporary Order to Cease and Desist, Respondent, shall notify all CT Clients of the existence of this Order of Summary Suspension, Temporary Order to Cease and Desist, Notice of Intent to Issue Order to Cease and Desist, Notice of Intent to Revoke Consumer Collection Agency License, Notice of Intent to Impose Civil Penalty and Notice of Right to Hearing and that Respondent’s consumer collection agency license in Connecticut has been summarily suspended, pending proceedings for revocation. Respondent shall provide evidence of such notification to the Division no later than fourteen (14) days after receipt of this Temporary Order to Cease and Desist;
5. Respondent shall immediately secure all records, files and documents relating to its consumer collection activity in Connecticut (collectively, “Records”). The Records shall be available to the Commissioner in their entirety upon request;

6. Respondent shall immediately remit all monies held in trust for CT Clients and any future monies received relating to Connecticut consumer debtor accounts to CT Clients. No later than thirty (30) days after the date of this Temporary Order to Cease and Desist, Respondent shall submit evidence of compliance with this paragraph to the Division, including but not limited to, receipts confirming the transmittal of funds, check numbers for payments issued and an accounting of amounts paid to each CT Client;
7. Respondent shall immediately place any unearned fees relating to consumer collection activity on Connecticut consumer debtor accounts in a separate escrow account at a federally-insured bank, Connecticut credit union, federal credit union or out-of-state bank that maintains in this state a branch as defined in Section 36a-410(1) of the Connecticut General Statutes, and notify the Division of the account number and location of such account; and
8. All notifications to the Division required pursuant to these paragraphs shall be directed to Carmine Costa, Director, Consumer Credit Division, Department of Banking, 260 Constitution Plaza, Hartford, Connecticut 06103-1800, or carmine.costa@ct.gov.

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, at 25600 Rye Canyon Road Suite 209, Santa Clarita, California, to issue an order requiring Respondent to **CEASE AND DESIST** from violating Sections 36a-17(e) of the Connecticut 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 within fourteen (14) days following Respondent's receipt of this Order of Summary Suspension, Temporary Order to Cease and Desist, 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 Sections 36a-52(a) and 36a-50(a) of the Connecticut General Statutes, as amended. This Order of Summary Suspension, Temporary Order to Cease and Desist, 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 February 24, 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 fails to appear at the 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, 25600 Rye Canyon Road Suite 209, Santa Clarita, California, will issue an order that Respondent cease and desist from violating Section 36a-17(e) of the Connecticut 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 7th day of December 2021.

/s/ _____
Jorge L. Perez
Banking Commissioner

CERTIFICATION

I hereby certify that on this 7th day of December 2021, I transmitted the foregoing Order of Summary Suspension, Temporary Order to Cease and Desist, 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 to Yes Online Inc d/b/a Dynamic Legal Recovery d/b/a YES ONLINE INC, Attention: Marilyn Taylor, CEO, who is designated as the primary contact in the contact employee fields on the Nationwide Multistate Licensing System and Registry, at the electronic mail address provided therein.

/s/
Emily B. Bochman