
IN THE MATTER OF:

**TORRINGTON WIRELESS LLC
NMLS # 1402181**

(“Respondent”)

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CONSENT ORDER

WHEREAS, the Banking Commissioner (“Commissioner”) is charged with the administration of Part IV of Chapter 668, Sections 36a-580 to 36a-589, inclusive, of the Connecticut General Statutes, “Check Cashing Services”;

WHEREAS, Respondent is a Connecticut limited liability company with a business address of 246 North Elm Street, Torrington, Connecticut;

WHEREAS, on February 1, 2022, Respondent filed an application for a check cashing license in Connecticut with the Commissioner on the Nationwide Multistate Licensing System and Registry (“NMLS”);

WHEREAS, Respondent previously maintained a check cashing license in this state from October 23, 2008 until January 1, 2019;

WHEREAS, the Commissioner, through the Consumer Credit Division of the Department of Banking, conducted an investigation pursuant to Section 36a-17 of the General Statutes, in effect at such time, into the activities of Respondent 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, as a result of such investigation, the Commissioner alleges that from January 2019 until the current license application, Respondent engaged in the business of cashing checks, drafts or money orders for consideration in Connecticut without licensure at its primary business address, in violation of Section 36a-581(a) of the Connecticut General Statutes;

WHEREAS, the Commissioner believes that such allegation would support initiation of enforcement proceedings against Respondent, including proceedings to issue a cease and desist order against Respondent pursuant to Section 36a-587(b) of the Connecticut General Statutes and Section 36a-52(a) of the 2022 Supplement to the General Statutes, and impose a civil penalty of up to one hundred thousand dollars (\$100,000) per violation on Respondent pursuant to Section 36a-587(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 may 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, both the Commissioner and Respondent acknowledge the possible consequences of formal administrative proceedings, and Respondent voluntarily agrees to consent to the entry of the sanctions imposed below without admitting or denying the allegation contained herein, and solely for the purpose of obviating the need for further formal administrative proceedings concerning the allegation contained herein;

WHEREAS, the Commissioner and Respondent now desire to resolve the matters set forth herein;

WHEREAS, Respondent specifically assures the Commissioner that the violation described herein shall not occur in the future;

WHEREAS, Respondent acknowledges that this Consent Order is a public record and is a reportable event for purposes of the regulatory disclosure questions on NMLS, as applicable;

AND WHEREAS, Respondent, through its execution of this Consent Order, voluntarily agrees to waive its procedural rights, including a right to notice and an opportunity for 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, Respondent, through its execution of this Consent Order, consents to the Commissioner's entry of a Consent Order imposing the following sanctions:

1. Respondent 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 Five Thousand Dollars (\$5,000) as a civil penalty payable in two (2) installments as follows: Two Thousand Five Hundred Dollars (\$2,500) at the time this Consent Order is executed and Two Thousand Five Hundred Dollars (\$2,500) no later than 30 days following the execution of this Consent Order;
2. No later than sixty (60) days following the date this Consent Order is executed by Respondent, 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 One Thousand Nine Hundred Dollars (\$1,900) as back-licensing fees; and
3. Respondent shall not engage in the business of cashing checks, drafts or money orders for consideration without obtaining a license to operate a check cashing general facility or limited facility for each location where such business is to be conducted, in violation of Section 36a-581(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 Respondent 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 Respondent 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 Respondent and reflected herein is subsequently discovered to be untrue;

3. Respondent 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;
4. Except as specifically provided herein, Respondent 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 Respondent'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;
5. Subject to the foregoing, and so long as this Consent Order is promptly disclosed by Respondent and its control persons on NMLS, as applicable, nothing in the issuance of this Consent Order shall adversely affect the ability of Respondent to apply for or obtain an initial license or renewal license under Part IV of Chapter 668, Sections 36a-580 to 36a-589, inclusive, of the Connecticut General Statutes, provided all applicable legal requirements for such license are satisfied and the terms of this Consent Order are followed;
6. This Consent Order shall be binding upon Respondent and its successors and assigns; and
7. This Consent Order shall become final when issued.

Issued at Hartford, Connecticut
this 6th day of September 2022.

_____/s/_____
Jorge Perez
Banking Commissioner

I, Gurvinder Bharara, state on behalf of Torrington Wireless 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 Torrington Wireless LLC; that Torrington Wireless LLC agrees freely and without threat or coercion of any kind to comply with the sanction entered and terms and conditions ordered herein; and that Torrington Wireless 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: Gurvinder Bharara
Title: Owner
Torrington Wireless LLC

State of: Connecticut

County of: Litchfield

On this the 29th day of August 2022, before me, Amy DiPippo, the undersigned officer, personally appeared Gurvinder Bharara who acknowledged himself/herself to be the Owner of Torrington Wireless LLC, a limited liability company, and that he/she as such Gurvinder Bharara, being authorized so to do, executed the foregoing instrument for the purposes therein contained, by signing the name of the corporation by himself/herself as Owner.

In witness whereof I hereunto set my hand.

_____/s/_____
Notary Public
Date Commission Expires: 3/3/2023