
 *
IN THE MATTER OF: *
 *
PALLIDA, LLC (“Pallida”) *
NMLS # 1310880 *
 *
LYCASTE, LLC (“Lycaste”) *
NMLS # 2068670 *
 *
ARGOLICA, LLC (“Argolica”) *
NMLS # 1853224 *
 *
LAELIA, LLC (“Laelia”) *
NMLS # 1700294 *
 *
ISANTHES, LLC (“Isanthes”) *
NMLS # 1828100 *
 *
(collectively, “Respondents”) *
 *

**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. LEGAL AUTHORITY AND JURISDICTION

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, has investigated the renewal application submitted by Pallida to determine if it meets the minimum standards for renewal of its consumer collection agency license for the licensing period ending December 31, 2022 (“Investigation”).

3. As a result of the Investigation, the Commissioner has reason to believe that Pallida has violated Section 36a-17(e) of the Connecticut General Statutes in effect at such time.

4. As a result of the Investigation, sufficient grounds exist to revoke Pallida's license to act as a consumer collection agency in Connecticut pursuant to Section 36a-804(a) and subsections (a) and (b) of Section 36a-51 of the Connecticut General Statutes.

5. Pursuant to the authority granted by Section 36a-17 of the Connecticut General Statutes in effect at such time, the Commissioner, through the Division, has reviewed the activities of Isanthes, Lycaste, Argolica and Laelia to determine if any of them have violated, are violating, or are about to violate the provisions of the Connecticut General Statutes and Regulations within the jurisdiction of the Commissioner.

6. As a result, the Commissioner has reason to believe that Isanthes, Lycaste, Argolica and Laelia have violated Section 36a-801(a) of the Connecticut General Statutes in effect at such time.

7. As a result, the Commissioner finds that the public welfare requires immediate action to issue an order to cease and desist against Isanthes, Lycaste, Argolica and Laelia from violating Section 36a-801(a) of the 2022 Supplement to the General Statutes, pursuant to Section 36a-52(b) of the 2022 Supplement to the General Statutes.

8. As a result, the violations alleged by the Commissioner form the basis to issue an order to cease and desist against Isanthes, Lycaste, Argolica and Laelia pursuant to Section 36a-804(b) of the Connecticut General Statutes and Section 36a-52(a) of the 2022 Supplement to the General Statutes.

9. As a result, the violations alleged by the Commissioner form the basis to impose a civil penalty against Isanthes, Lycaste, Argolica and Laelia pursuant to Section 36a-804(b) of the Connecticut General Statutes and Section 36a-50(a) of the 2022 Supplement to the General Statutes.

II. MATTERS ASSERTED

10. Respondents are Delaware limited liability companies which are related entities that share the following in common at all times pertinent: business address, 2003 Western Avenue, Suite 340, Seattle, Washington; Indirect Owner Administrator, Ophyr, LLC; Indirect Owner Trustee, Wilmington Trust, NA; and control person, Maria del Rocio Zulueta Dizon, NMLS # 1997894.

Revocation

11. Pallida has been licensed to act as a consumer collection agency in this state since June 3, 2019.

12. On November 29, 2021, Pallida filed an application for renewal of its consumer collection agency license on the Nationwide Multistate Licensing System and Registry (“NMLS”), which application is currently pending.

13. The Division’s Investigation indicates that Pallida failed to comply with the renewal requirements for its consumer collection agency license for fiscal year ending December 31, 2021, pursuant to Section 36a-801(b)(2) of the Connecticut General Statutes in effect at such time.

14. On October 29, 2021, Pallida submitted an advance change notice on NMLS, replacing its ownership with a private company, and left its direct ownership blank. On November 11, 2021, the Division placed a deficiency on NMLS for Pallida to complete the indirect ownership information on NMLS, which has not been completed to date.

15. On January 27, 2022, Pallida’s qualifying individual (“QI”), control person and primary contact removed her association as QI and control person on NMLS. On March 28, 2022, the Division placed a deficiency on NMLS for Pallida to address, which Pallida has not done. Pallida also failed to submit its financial statement required for fiscal year ending 2021.

16. On May 16, 2022, pursuant to Section 4-182(c) of the Connecticut General Statutes, the Division gave Pallida an opportunity to show compliance with all lawful requirements for retention and renewal of its consumer collection agency license in Connecticut pursuant to Section 36a-801(b)(2) of the

2022 Supplement to the General Statutes, by e-mail to Pallida's primary company contact on NMLS. To date, no response has been received.

17. To date, Pallida has not filed an application for renewal of its license to act as a consumer collection agency in Connecticut for 2023. As a result, Pallida's consumer collection agency license expired on December 31, 2022.

Unlicensed Activity

18. Laelia was licensed to act as a consumer collection agency from August 29, 2018, until its license was surrendered on November 18, 2020.

19. In August 2020, the Division reviewed documents submitted by Laelia in connection with the surrender of its license and became aware that Laelia sold debt to a related entity, Isanthes, which engaged in consumer collection activity on Connecticut accounts and has never been licensed to act as a consumer collection agency in Connecticut.

20. On January 6, 2021, the Division sent a letter to Isanthes regarding the unlicensed consumer collection activity and notified it that a license is required to continue its business activities in Connecticut.

21. On February 5, 2021, the Division explained to Isanthes that debt buying and indirect consumer collection activities require licensure in Connecticut.

22. On February 5, 2021, Isanthes submitted an application for a license to act as a consumer collection agency in Connecticut, which is currently pending with outstanding deficiencies identified by the Division.

23. During the Division's review of the license application submitted by Isanthes, it was discovered that Isanthes, Lycaste, Argolica and Laelia are related entities that engaged in unlicensed consumer collection activity by buying Connecticut debtor accounts.

24. In January and February 2021, Lycaste, Argolica and Laelia each applied for a license to act as a consumer collection agency in Connecticut, which applications are currently pending with deficiencies.

25. The Division requested that Isanthes, Lycaste, Argolica and Laelia submit a report of their Connecticut collection activity. In response, Isanthes reported that between March 29, 2019 and December 17, 2019, it purchased three Connecticut accounts with a total debt of \$689,403.43; Lycaste reported that between November 1, 2019 and December 31, 2020, it purchased eight Connecticut accounts with a total debt of \$1,608,509.37; and Argolica reported that between November 1, 2019 and October 31, 2020, it purchased eight Connecticut accounts with a total debt of \$1,790,353.13. Isanthes, Lycaste, Argolica and Laelia each reported that they engaged other licensed entities to perform direct collection of consumer debt.

26. The Division identified multiple lawsuits filed in the Connecticut Superior Court on behalf of Isanthes, Lycaste, Argolica and Laelia against Connecticut debtor accounts.

27. At no time relevant hereto were said respondents licensed to act as consumer collection agencies in Connecticut.

28. The Division has contacted said respondents, through their attorney in common, however, communications have ceased, said respondents have failed to address the issue of unlicensed activity and have not cleared the outstanding deficiencies to meet licensure requirements.

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

29. Pallida failed to address outstanding deficiencies for retention of its license. Specifically, Pallida failed to submit the required financial statements, name a QI and provide a complete chain of indirect ownership with an individual or publicly traded company with 10% or greater ownership for retention of its license. In addition, Pallida failed to cooperate with the Division's requests for information, as more fully described in paragraphs 10 through 17, inclusive, in violation of Section 36a-17(e) of the Connecticut General Statutes in effect at such time. Such violation constitutes sufficient grounds to revoke Respondent's consumer collection agency license in Connecticut pursuant to Section

36a-804(a)(3) of the Connecticut General Statutes and subsections (a) and (b) of Section 36a-51 of the Connecticut General Statutes.

30. Lycaste acting within this state as a consumer collection agency without a consumer collection agency license, as more fully described in paragraphs 10, and 23 through 28, inclusive, constitutes a violation of Section 36a-801(a) of the Connecticut General Statutes in effect at such time. Such violation forms the basis to issue an order to cease and desist 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 to impose a civil penalty pursuant to Section 36a-804(b) of the Connecticut General Statutes and Section 36a-50(a) of the 2022 Supplement to the General Statutes. Section 36a-50(a) of the 2022 Supplement to the General Statutes authorizes the Commissioner to impose a civil penalty upon Lycaste in an amount not to exceed One Hundred Thousand Dollars (\$100,000) per violation.

31. Argolica acting within this state as a consumer collection agency without a consumer collection agency license, as more fully described in paragraphs 10, and 23 through 28, inclusive, constitutes a violation of Section 36a-801(a) of the Connecticut General Statutes in effect at such time. Such violation forms the basis to issue an order to cease and desist 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 to impose a civil penalty pursuant to Section 36a-804(b) of the Connecticut General Statutes and Section 36a-50(a) of the 2022 Supplement to the General Statutes. Section 36a-50(a) of the 2022 Supplement to the General Statutes authorizes the Commissioner to impose a civil penalty upon Argolica in an amount not to exceed One Hundred Thousand Dollars (\$100,000) per violation.

32. Laelia acting within this state as a consumer collection agency without a consumer collection agency license, as more fully described in paragraphs 10, 18, 19, and 23 through 28, inclusive, constitutes a violation of Section 36a-801(a) of the Connecticut General Statutes in effect at such time. Such violation forms the basis to issue an order to cease and desist 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 to impose a

civil penalty pursuant to Section 36a-804(b) of the Connecticut General Statutes and Section 36a-50(a) of the 2022 Supplement to the General Statutes. Section 36a-50(a) of the 2022 Supplement to the General Statutes authorizes the Commissioner to impose a civil penalty upon Laelia in an amount not to exceed One Hundred Thousand Dollars (\$100,000) per violation.

33. Isanthes acting within this state as a consumer collection agency without a consumer collection agency license, as more fully described in paragraphs 10, 18 through 23, inclusive, and 25 through 28, inclusive, constitutes a violation of Section 36a-801(a) of the Connecticut General Statutes in effect at such time. Such violation forms the basis to issue an order to cease and desist 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 to impose a civil penalty pursuant to Section 36a-804(b) of the Connecticut General Statutes and Section 36a-50(a) of the 2022 Supplement to the General Statutes. Section 36a-50(a) of the 2022 Supplement to the General Statutes authorizes the Commissioner to impose a civil penalty upon Isanthes in an amount not to exceed One Hundred Thousand Dollars (\$100,000) per violation.

IV. FINDING AND STATUTORY BASIS FOR TEMPORARY ORDER TO CEASE AND DESIST

The Commissioner finds that the public welfare requires immediate action to issue a temporary order requiring Isanthes, Lycaste, Argolica and Laelia to cease and desist from violating Section 36a-801(a) of the 2022 Supplement to the General Statutes, and requiring Isanthes, Lycaste, Argolica and Laelia to take such action as set forth herein to effectuate the purposes of Section 36a-52(b) of the 2022 Supplement to the General Statutes, in that the interests of Connecticut consumer debtors are being prejudiced by Isanthes, Lycaste, Argolica and Laelia collecting and attempting to collect debts of Connecticut consumer debtors without a Connecticut consumer collection agency license.

V. 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

WHEREAS, the Commissioner has reason to believe that Pallida has failed to demonstrate the minimum requirements to maintain its consumer collection agency license, which constitutes sufficient grounds for the Commissioner to revoke Pallida's consumer collection agency license 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.

WHEREAS, the Commissioner has reason to believe that Isanthes acted within this state as a consumer collection agency without a consumer collection agency license, which constitutes sufficient grounds for the Commissioner issue an order to cease and desist 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 to impose a civil penalty pursuant to Section 36a-804(b) of the Connecticut General Statutes and Section 36a-50(a) of the 2022 Supplement to the General Statutes. Section 36a-50(a) of the 2022 Supplement to the General Statutes authorizes the Commissioner to impose a civil penalty upon Isanthes in an amount not to exceed One Hundred Thousand Dollars (\$100,000) per violation;

WHEREAS, the Commissioner has reason to believe that Lycaste acted within this state as a consumer collection agency without a consumer collection agency license, which constitutes sufficient grounds for the Commissioner issue an order to cease and desist 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 to impose a civil penalty pursuant to Section 36a-804(b) of the Connecticut General Statutes and Section 36a-50(a) of the 2022 Supplement to the General Statutes. Section 36a-50(a) of the 2022 Supplement to the General Statutes authorizes the Commissioner to impose a civil penalty upon Lycaste in an amount not to exceed One Hundred Thousand Dollars (\$100,000) per violation;

WHEREAS, the Commissioner has reason to believe that Argolica acted within this state as a consumer collection agency without a consumer collection agency license, which constitutes sufficient grounds for the Commissioner issue an order to cease and desist 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 to

impose a civil penalty pursuant to Section 36a-804(b) of the Connecticut General Statutes and Section 36a-50(a) of the 2022 Supplement to the General Statutes. Section 36a-50(a) of the 2022 Supplement to the General Statutes authorizes the Commissioner to impose a civil penalty upon Argolica in an amount not to exceed One Hundred Thousand Dollars (\$100,000) per violation;

WHEREAS, the Commissioner has reason to believe that Laelia acted within this state as a consumer collection agency without a consumer collection agency license, which constitutes sufficient grounds for the Commissioner issue an order to cease and desist 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 to impose a civil penalty pursuant to Section 36a-804(b) of the Connecticut General Statutes and Section 36a-50(a) of the 2022 Supplement to the General Statutes. Section 36a-50(a) of the 2022 Supplement to the General Statutes authorizes the Commissioner to impose a civil penalty upon Laelia in an amount not to exceed One Hundred Thousand Dollars (\$100,000) per violation;

AND WHEREAS, the Commissioner has made the finding required under Section 36a-52(b) of the 2022 Supplement to the General Statutes.

THE COMMISSIONER THEREFORE ORDERS, pursuant to the authority granted in Section 36a-52(b) of the 2022 Supplement to the General Statutes, that Isanthes, LLC, Lycaste, LLC, Argolica, LLC and Laelia, LLC immediately **CEASE AND DESIST** from further violation of Section 36a-801(a) of the 2022 Supplement to the General Statutes. This Temporary Order to Cease and Desist shall become effective upon receipt by Isanthes, LLC, Lycaste, LLC, Argolica, LLC and Laelia, LLC 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.

THE COMMISSIONER FURTHER ORDERS, pursuant to the authority granted in Sections 36a-17 and 36a-52(b) of the 2022 Supplement to the General Statutes, that: Not later than fourteen (14) days from receipt of this 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, Isanthes LLC, Lycaste, LLC, Argolica, LLC and Laelia, LLC shall provide to Carmine Costa, Director, Consumer Credit Division, Department of Banking, 260 Constitution Plaza, Hartford, Connecticut 06103-1800, or carmine.costa@ct.gov, an itemized list of all Connecticut consumer collection activity it collected, attempted to collect on, or received monies on since November 1, 2019, including: (a) the name, address, and telephone number of each consumer debtor, (b) the date of placement with each entity, the creditor name and last attempt of contact, and (c) full itemization of each consumer debtor's payments made since November 1, 2019, specifying the dates, amounts and to whom such payments were made for any and all other affiliated entities.

FURTHER, NOTICE is hereby given to Isanthes, Lycaste, Argolica and Laelia that the Commissioner intends to issue a permanent order requiring Isanthes, Lycaste, Argolica and Laelia to **CEASE AND DESIST** from violating Section 36a-801(a) of the 2022 Supplement to the General Statutes, and to impose a **CIVIL PENALTY** upon Isanthes, Lycaste, Argolica and Laelia as set forth herein, subject to each Respondent's right to a hearing on the allegations set forth above.

FURTHER, NOTICE is hereby given to Pallida that the Commissioner intends to issue an order to **REVOKE** Pallida's consumer collection agency license in Connecticut.

A hearing will be granted to each 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)'s receipt of this Temporary Order to Cease and Desist, Notice of Intent to Revoke Consumer Collection Agency License, Notice of Intent 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 2022 Supplement to the General Statutes and subsections (a) and (b) of Section 36a-51 of the Connecticut General Statutes. This Temporary Order to Cease and Desist, Notice of Intent to Revoke Consumer Collection Agency License, Notice of Intent 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 any Respondent will not be represented by an attorney at the hearing, please complete the Appearance and Request for Hearing Form as “pro se”. Any 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 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 May 3, 2023, 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 any Respondent fails to appear at the requested hearing. At such hearing, Respondents 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, as amended by Section 1 of Public Act 22-3, and the Remote Hearing Guidelines available on the Department’s website at <https://portal.ct.gov/dob>.

If Pallida does not request a hearing within the time prescribed or fails to appear at any such hearing, the allegation herein against Pallida will be deemed admitted. Accordingly, the Commissioner will issue an order revoking Pallida’s consumer collection agency license in this state for the reasons set forth herein, and such order shall cause Pallida’s consumer collection agency license in Connecticut to be **REVOKED**.

If Isanthes does not request a hearing within the time period prescribed or fails to appear at any such hearing, the allegation against Isanthes herein will be deemed admitted. Accordingly, the

Commissioner will issue an order that Isanthes cease and desist from violating Section 36a-801(a) of the 2022 Supplement to the 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 Isanthes.

If Lycaste does not request a hearing within the time period prescribed or fails to appear at any such hearing, the allegation herein against Lycaste will be deemed admitted. Accordingly, the Commissioner will issue an order that Lycaste cease and desist from violating Section 36a-801(a) of the 2022 Supplement to the 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 Lycaste.

If Argolica does not request a hearing within the time period prescribed or fails to appear at any such hearing, the allegation against Argolica herein will be deemed admitted. Accordingly, the Commissioner will issue an order that Argolica cease and desist from violating Section 36a-801(a) of the 2022 Supplement to the 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 Argolica.

If Laelia does not request a hearing within the time period prescribed or fails to appear at any such hearing, the allegation against Laelia herein will be deemed admitted. Accordingly, the Commissioner will issue an order that Laelia cease and desist from violating Section 36a-801(a) of the 2022 Supplement to the 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 Laelia.

So ordered at Hartford, Connecticut,
this 28th day of February, 2023.

/s/

Jorge L. Perez
Banking Commissioner

CERTIFICATION

I hereby certify that on this 1st day of March 2023, I caused the foregoing 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 be mailed by certified mail, return receipt requested, to: Pallida, LLC, Attention: Eustanik Blanco Castillo, Authorized Representative of Entity Manager, 2003 Western Avenue, Suite 340, Seattle, Washington, 98121, Certified Mail No. 7022 1670 0002 0923 3071; Isanthes, LLC, Attention: Eustanik Blanco Castillo, Authorized Representative of Entity Manager, 2003 Western Avenue, Suite 340, Seattle, Washington, 98121, Certified Mail No. 7022 1670 0002 0923 3088; Lycaste, LLC, Attention: Eustanik Blanco Castillo, Authorized Representative of Entity Manager, 2003 Western Avenue, Suite 340, Seattle, Washington, 98121, Certified Mail No. 7022 1670 0002 0923 3095; Argolica, LLC, Attention: Matthew Wells, Authorized Representative of Entity Manager, 2001 Western Blvd, Suite 400, Seattle, Washington, 98121, Certified Mail No. 7022 1670 0002 0923 3101; and Laelia, LLC, Attention: Eustanik Blanco Castillo, Authorized Representative of Entity Manager, 2003 Western Avenue, Suite 340, Seattle, Washington, 98121, Certified Mail No. 7022 1670 0002 0923 3118.

/s/

Emily Bochman
Paralegal