

WHEREAS, in the Amended Complaint, CLG represented that CSG only provides debt negotiation services through personnel supervised and directed in their tasks by CLG attorneys licensed in Connecticut, and therefore, CSG is entitled to the attorney exemption from debt negotiation licensure set forth in Section 36a-671c of the Connecticut General Statutes;

WHEREAS, on January 20, 2023, the Department filed a Motion to Dismiss the Amended Complaint (“Motion to Dismiss”) asserting that the Superior Court lacked subject matter jurisdiction and the matter should proceed in the administrative forum;

WHEREAS, on April 12, 2023, the Motion to Dismiss was denied;

WHEREAS, on May 1, 2023, the denial was appealed to the Connecticut Appellate Court and on May 16, 2024, the appeal was transferred to the Connecticut Supreme Court;

WHEREAS, on April 8, 2025, the Connecticut Supreme Court affirmed the decision of the Superior Court that the Superior Court retained jurisdiction over the matter and remanded it for additional discovery concerning the Amended Complaint;

WHEREAS, pursuing additional discovery is unnecessary as CSG and CLG represent they have ceased debt negotiation operations nationwide and are no longer performing services on behalf of Connecticut residents;

WHEREAS, Section 4-177(c) of the Connecticut General Statutes and Section 36a-1-55(a) of the Regulations of the Connecticut State Agencies provides that a contested case may be resolved by stipulation or agreed settlement, unless precluded by law;

WHEREAS, the Commissioner, CSG and CLG desire to settle the matters described herein and voluntarily enter into this Stipulation and Agreement without any admission by any party, acknowledging that this Stipulation and Agreement is in lieu of any court action or further administrative proceedings adjudicating any issue of fact or law alleged against CSG in the Notice;

AND WHEREAS, CSG and CLG, through their respective execution of this Stipulation and Agreement, voluntarily waive any rights they may have to seek judicial review or otherwise challenge or contest the terms and conditions of this Stipulation and Agreement.

NOW, THEREFORE, in consideration of the foregoing recitals, the parties hereby mutually agree as follows:

1. This Stipulation and Agreement resolves all matters alleged by the Commissioner against CSG in the Notice;

2. Concerning the contested case initiated by the Commissioner against CSG via the Notice, the parties hereby waive all further administrative proceedings provided for in the Uniform Administrative Procedure Act and the Department's contested case regulations (Sections 36a-1-19 to 36a-1-57, inclusive, of the Regulations of Connecticut State Agencies) and judicial review by any court;

3. Within five (5) days of the execution of this Stipulation and Agreement by CSG and CLG, CSG and CLG shall withdraw all claims, without costs to any party, in the pending lawsuit in Superior Court for the Judicial District of Hartford titled *Commonwealth Servicing Group, LLC et.al. v. State of Connecticut Department of Banking*, HHD-CV22-6168398-S;

4. Without waiving any defense or right to challenge the Commissioner's jurisdiction, thirty (30) days prior to engaging or offering to engage in debt negotiation in Connecticut, CSG and CLG agree to notify the Commissioner, in writing, and provide documentation demonstrating that such activities are not within the regulatory purview of the Commissioner;

5. Execution of this Stipulation and Agreement is without prejudice to the right of the Commissioner to take enforcement action against CSG or CLG if any representation made by CSG or CLG and reflected herein is determined to be untrue or if CSG or CLG fails to comply with any term or condition stated herein. Further, CSG and CLG reserves its right to challenge any such action to the full extent allowed by law; and

6. This Stipulation and Agreement shall become binding when executed by CSG, CLG and the Commissioner.

IN WITNESS WHEREOF, the undersigned have executed this Stipulation and Agreement on the dates indicated.

STATE OF CONNECTICUT
DEPARTMENT OF BANKING

/s/

Jorge L. Perez
Banking Commissioner

12/17/2025

Date

COMMONWEALTH GROUP SERVICING, LLC

/s/

Name: Daniel Kwiatek

12/11/2025

Date

LAW OFFICES OF AMBER FLORIO, PLLC
d/b/a COMMONWEALTH LAW GROUP

/s/

Name: Tom Rogus

12/16/2025

Date