
*
IN THE MATTER OF: *
*
DEBT DIRECT PORTFOLIO *
MANAGEMENT, LLC *
NMLS # 1856637 *
*
(“Debt Direct”) *
*

CONSENT ORDER

WHEREAS, the Banking Commissioner (“Commissioner”) is charged with the administration of Part III of Chapter 668, Sections 36a-555 to 36a-573, inclusive, of the Connecticut General Statutes, “Small Loan Lending and Related Activities”, and the regulations promulgated thereunder, Sections 36a-570-1 to 36a-570-17, inclusive, of the Regulations of Connecticut State Agencies, and 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;

WHEREAS, Debt Direct is a New York limited liability company with an office located at 1800 Elmwood Avenue, Buffalo, New York;

WHEREAS, Debt Direct has never been licensed to engage in small loan activities in Connecticut, nor has it ever been licensed to act as a consumer collection agency in Connecticut;

WHEREAS, the Commissioner, through the Consumer Credit Division of the Department of Banking, conducted an investigation pursuant to Section 36a-17 of the Connecticut General Statutes, into the activities of Debt Direct to determine if it had violated, was violating or was about to violate the

provisions of the Connecticut General Statutes and Regulations of Connecticut State Agencies within the jurisdiction of the Commissioner;

WHEREAS, as a result of such investigation, the Commissioner alleges that: (1) from at least August 2019 to January 2025, Debt Direct engaged in small loan activity in Connecticut without a license, by purchasing, acquiring or receiving assignment of small loans made to Connecticut borrowers, in violation of Section 36a-556(a)(5) of the Connecticut General Statutes, in effect at such time; and (2) from at least August 2019 to January 2025, Debt Direct acted as a consumer collection agency in Connecticut without a license, by collecting on eight small loans made to Connecticut borrowers that were acquired from another person and were either delinquent or in default at the time acquired, in violation of Section 36a-801(a) of the Connecticut General Statutes, in effect at such time;

WHEREAS, the Commissioner believes that such allegations would support initiation of enforcement proceedings against Debt Direct, including, without limitation, proceedings to issue an order to cease and desist against Debt Direct pursuant to Sections 36a-570(b), 36a-804(b) and 36a-52(a) of the Connecticut General Statutes and an order imposing a civil penalty of up to One Hundred Thousand Dollars (\$100,000) per violation upon Debt Direct pursuant to Sections 36a-570(b), 36a-804(b) and 36a-50(a) of the Connecticut General Statutes;

WHEREAS, initiation of such enforcement proceedings would constitute a “contested case” within the meaning of Section 4-166(4) of the Connecticut General Statutes. 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, the Commissioner and Debt Direct acknowledge the possible consequences of formal administrative proceedings, and Debt Direct voluntarily agrees to consent to the entry of the sanctions imposed below without admitting or denying the allegations set forth herein, and solely for the purpose of obviating the need for formal administrative proceedings concerning the allegations contained herein;

WHEREAS, Debt Direct acknowledges that it has had the opportunity to consult with and be represented by independent counsel in negotiating and reviewing this Consent Order and executes this Consent Order freely;

WHEREAS, the Commissioner and Debt Direct now desire to resolve the matter set forth herein;

WHEREAS, Debt Direct represents that it has never received payments on small loans made to Connecticut borrowers nor reported the payment history of such loans to credit reporting agencies;

WHEREAS, Debt Direct represents that it has written off all debt acquired and collected upon without a small loan license or consumer collection agency license in Connecticut;

WHEREAS, Debt Direct specifically assures the Commissioner that the violations alleged herein shall not occur in the future;

WHEREAS, Debt Direct acknowledges that this Consent Order is a public record and is a reportable event for purposes of the regulatory disclosure questions on the Nationwide Multistate Licensing System and Registry (“NMLS”), as applicable;

WHEREAS, Debt Direct herein represents to the Commissioner that it has reviewed and updated its internal policies, procedures and controls for ensuring compliance with small loan company licensure and consumer collection agency licensure requirements in Connecticut;

AND WHEREAS, Debt Direct, through its execution of this Consent Order, voluntarily agrees to waive its procedural rights, including a right to a notice and an opportunity for a hearing as it pertains to the allegations 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, Debt Direct, through its execution of this Consent Order, consents to the Commissioner’s entry of a Consent Order imposing the following sanctions:

1. Debt Direct shall cease and desist from: (a) engaging in small loan activities without the required license, in violation of Section 36a-556(a) of the Connecticut General Statutes, and (b) acting as a consumer collection agency in Connecticut without the required license, in violation of Section 36a-801(a) of the Connecticut General Statutes;

2. Debt Direct shall remit the sum of Twenty Thousand Dollars (\$20,000) as a civil penalty, payable in four equal installments of Five Thousand Dollars (\$5,000). The first installment shall be due no later than the date this Consent Order is executed by Debt Direct, and the remaining three installments shall be due no later than November 1, 2025, December 1, 2025 and January 1, 2026, respectively. Payments shall be made to the Department of Banking by electronic funds transfer, cashier's check, certified check or money order made payable to "Treasurer, State of Connecticut"; and
3. No later than the date this Consent Order is executed by Debt Direct, 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 Three Thousand Dollars (\$3,000) as payment for back licensing fees.

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 Debt Direct based upon the allegations set forth herein; provided that issuance of this Consent Order is without prejudice to the right of the Commissioner to take enforcement action against Debt Direct 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 Debt Direct and reflected herein is subsequently discovered to be untrue;
3. Debt Direct 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. Except as specifically provided herein, Debt Direct 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 Debt Direct'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;
4. Subject to the foregoing, and so long as this Consent Order is promptly disclosed by Debt Direct and its control persons on NMLS, as applicable, nothing in the issuance of this Consent Order shall adversely affect the ability of Debt Direct to apply for or obtain initial licenses or renewal licenses under Part III of Chapter 668, Sections 36a-555 *et seq.*, of the Connecticut General Statutes and Part XII of Chapter 669, Sections 36a-800 *et seq.*, of the Connecticut General Statutes, provided that all applicable legal requirements for any such licenses are satisfied and the terms of this Consent Order are being followed;

5. This Consent Order shall be binding upon Debt Direct and its successors and assigns; and
6. This Consent Order shall become final when issued.

Issued at Hartford, Connecticut
this 2nd day of October 2025.

/s/

Jorge L. Perez
Banking Commissioner

I, Titus Tallchief, state on behalf of Debt Direct Portfolio Management, 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 Debt Direct Portfolio Management, LLC; that Debt Direct Portfolio Management, LLC agrees freely and without threat or coercion of any kind to comply with the sanctions entered and terms and conditions ordered herein; and that Debt Direct Portfolio Management, 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: Titus Tallchief
Title: Chief Operations Officer
Debt Direct Portfolio Management, LLC

State of: NY

County of: Erie

On this the 25th day of September 2025, before me, Maureen Sileo, the undersigned officer, personally appeared Titus Tallchief, who acknowledged himself/herself to be the COO, of Debt Direct Portfolio Management, LLC, a member managed/manager managed limited liability company, and that he/she as such COO, being authorized so to do, executed the foregoing instrument for the purposes therein contained, by signing the name of the limited liability company by himself/herself as chief operating officer.

In witness whereof I hereunto set my hand.

/s/
Notary Public
Date Commission Expires: 04/18/2026