WHEREAS, 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", as amended, and the regulations promulgated thereunder, Sections 36a-809-6 to 36a-809-17, inclusive, of the Regulations of Connecticut State Agencies;

WHEREAS, NCR is a Florida limited liability company with an office located at 2200 NW 2nd Avenue, Suite 106, Miami, Florida;

WHEREAS, NCR has never been licensed to act as a consumer collection agency in Connecticut; WHEREAS, on January 6, 2025, the Commissioner, through the Consumer Credit Division of the Department of Banking ("Division"), conducted an examination into the activities of a licensee ("Examination") and an investigation into the activities of NCR, pursuant to Section 36a-17 of the Connecticut General Statutes, 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 information and documentation provided by the licensee during the Examination, the Commissioner alleges that NCR acted as a consumer collection agency in this state

without the required license since at least January 1, 2025 to present, in violation of Section 36a-801(a) of the Connecticut General Statutes;

WHEREAS, the Commissioner believes that such allegation would support initiation of enforcement proceedings against NCR, including, without limitation, proceedings to issue an order to make restitution against NCR pursuant to Sections 36a-804(b) and 36a-50(c) of the Connecticut General Statutes, an order to cease and desist against NCR pursuant to Sections 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 NCR pursuant to Sections 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 NCR acknowledge the possible consequences of formal administrative proceedings, and NCR voluntarily agrees to consent to the entry of the sanctions imposed below without admitting or denying the allegation set forth herein, and solely for the purpose of obviating the need for formal administrative proceedings concerning the allegation set forth herein;

WHEREAS, NCR 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 NCR now desire to resolve the matter set forth herein;

WHEREAS, the Division contacted NCR directly based upon information provided during the Examination of the licensee, which revealed that the licensee sent accounts to NCR, and NCR cooperated with the Division's investigation and records request;

WHEREAS, NCR represents to the Division that NCR: (1) does not have any records of Connecticut consumer collection accounts for the past two (2) years; (2) shall review its current portfolio and ensure that all Connecticut accounts are removed; and (3) shall not engage in any unlicensed consumer collection activity in this state;

WHEREAS, NCR specifically assures the Commissioner that the violation alleged herein shall not occur in the future;

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

**AND WHEREAS,** NCR, 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 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,** NCR, through its execution of this Consent Order, consents to the Commissioner's entry of a Consent Order imposing the following sanctions:

- 1. NCR shall cease and desist from acting as a consumer collection agency in this state without a license, in violation of Section 36a-801(a) of the Connecticut General Statutes; and
- 2. No later than the date this Consent Order is executed by NCR, 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 Ten Thousand Dollars (\$10,000) as a civil penalty.

## **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 NCR based upon the allegation contained herein; provided that issuance of this Consent Order is without prejudice to

the right of the Commissioner to take enforcement action against NCR 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 NCR and reflected herein is subsequently discovered to be untrue;

- 3. NCR 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, NCR 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 NCR's (i) testimonial obligations, or (ii) right to take legal or factual positions 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 NCR and its control persons on NMLS, as applicable, nothing in the issuance of this Consent Order shall adversely affect the ability of NCR to apply for or obtain an initial license or renewal licenses under Part XII of Chapter 669, Sections 36a-800 *et seq.*, of the Connecticut General Statutes, provided that all applicable legal requirements for any such license are satisfied and the terms of this Consent Order are being followed;
- 5. This Consent Order shall be binding upon NCR and its successors and assigns; and
- 6. This Consent Order shall become final when issued.

		<u>/s/</u>
Issued at Hartford, Connecticut		Jorge L. Perez
this <u>9th</u> day of <u>December</u>	2025.	Banking Commissioner

Ι,	Sharleen Collins	_, state on behalf o	f Nations Client Resol	lution, LLC, that I have read the	
foregoing Consent Order; that I know and fully understand its contents; that I am authorized to execute					
this Conse	ent Order on behalf of I	Nations Client Reso	olution, LLC; that Nati	ions Client Resolution, LLC	
agrees fre	ely and without threat	or coercion of any l	kind to comply with th	e sanctions entered and terms	
and condi	tions ordered herein; as	nd Nations Client R	Resolution, LLC volum	tarily agrees to enter into this	
Consent C	Order, expressly waivin	g the procedural rig	ghts set forth herein as	to the matters described herein.	
		Ву	r: <u>/s/</u> Name: Sharleen Col Title: CEO Nations Client Resol		
State of:	Georgia	_			
County of	: <u>Gwinnett</u>				
On t	his the <u>3</u> day of _	December	, 2025, before me, _	<u>Chelsea Kopeikin</u> , the	
undersigned officer, personally appearedSharleen Collins, who acknowledged					
himself/he	himself/herself to be the of Nations Client Resolution, LLC, a member				
managed/1	manager managed limi	ted liability compa	ny, and that he/she as	such	
	<u>IS</u> , being authorized so to do, executed the foregoing instrument for the				
purposes t	therein contained, by si	gning the name of	the corporation by hin	nself/herself as	
	<u>CEO</u>				
In w	itness whereof I hereur	nto set my hand.			
			<u>/s/</u> Notary Public: Date Commission Ex	xpires: April 12, 2026	

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