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**IN THE MATTER OF:**

**PARKING REVENUE RECOVERY  
SERVICE, INC.  
a/k/a PARKING REVENUE  
RECOVERY SERVICES, INC.  
NMLS # 2503672**

**(“Respondent”)**

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**TEMPORARY ORDER TO  
CEASE AND DESIST**

**ORDER TO MAKE RESTITUTION**

**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, the Commissioner, through the Consumer Credit Division of the Department of Banking (“Department”), has investigated the activities of Respondent to determine if it has violated, is violating or is about to violate the provisions of the Connecticut General Statutes or the Regulations within the jurisdiction of the Commissioner (“Investigation”).

3. As a result of the Investigation, the Commissioner has reason to believe that Respondent has violated Sections 36a-801(a) and 36a-805(a)(12) of the Connecticut General Statutes.

4. As a result of the Investigation, the Commissioner finds that the public welfare requires immediate action to issue a temporary order to cease and desist against Respondent from violating

Sections 36a-801(a) and 36a-805(a)(12) of the Connecticut General Statutes, pursuant to Section 36a-52(b) of the Connecticut General Statutes.

5. As a result of the Investigation, the violations alleged by the Commissioner form the basis to issue an order to make restitution against Respondent pursuant to Sections 36a-804(b) and 36a-50(c) of the Connecticut General Statutes.

6. As a result of the Investigation, the violations alleged by the Commissioner form the basis to issue an order to cease and desist against Respondent pursuant to Sections 36a-804(b) and 36a-52(a) of the Connecticut General Statutes.

7. As a result of the Investigation, the violations alleged by the Commissioner form the basis to impose a civil penalty upon Respondent pursuant to Sections 36a-804(b) and 36a-50(a) of the Connecticut General Statutes.

## **II. MATTERS ASSERTED**

8. Respondent is a Colorado corporation with an office at 12381 E Cornell Avenue, Aurora, Colorado. Respondent has never been licensed to act as a consumer collection agency in Connecticut, nor is Respondent exempt from licensure requirements.

9. On August 14, 2023, a complaint was filed by a Connecticut resident (“Complainant”) stating that the Complainant and his wife received two (2) parking notices, both dated July 26, 2023, from Respondent concerning unpaid parking fees incurred by their daughter. The Complainant’s daughter (“Connecticut consumer debtor”) parked the Complainant’s vehicle in a privately owned lot in Connecticut on June 11 and June 18, 2023 for a combined total of three (3) hours. The parking rate was \$6 per hour on both occasions, which was due before the vehicle exited the property. However, the Connecticut consumer debtor mistakenly believed that parking was free on Sundays and did not pay the \$12 and \$6 base parking fees owed to the parking facility at the time of the transactions. Each parking notice stated “no payment received” as a parking violation resulting from the Connecticut consumer debtor’s failure to pay the amount owed to the parking facility at the time of the transactions. Each

parking notice demanded a fee of \$89.50 which was significantly higher than the balance owed for each transaction. Each parking notice warned that failure to make the payment within 30 days of the date of the notice may result in towing or booting of the Complainant's vehicle, and that the owner may be liable for additional costs and fees. Respondent is neither the owner nor the operator of the parking lot where the Complainant's vehicle was parked.

10. The Complainant requested clarification from the Department on Respondent's authority to charge the violation fees, the unreasonable high amount charged for the violation fees, which were significantly higher than the original amount owed, and for Respondent to remove any negative reports it may have placed with the credit bureaus against the owner of the vehicle as a result of the unpaid parking violation fees.

11. On December 5, 2023, the Department sent an email to Respondent requesting additional information about Respondent's business activities. On January 2, 2024, Respondent provided an email response explaining that it has a contract with a Connecticut parking lot owner/operator, Express Parking, LLC ("Operator") to provide parking enforcement services. Respondent stated that its authority to issue parking notices is based on the contract with the Operator to collect fees when a consumer violates the Operator's posted rules, terms or conditions. The Operator offers parking spaces for vehicles to park in its lot in exchange for a base parking fee at a rate set by the Operator. Consumers receive instructions for making payments, to the Operator, due at the time of the transaction. In its response, Respondent explained that if a consumer parks their vehicle in the lot and does not comply with the parking lot rules, the consumer is in violation, and Respondent issues a parking notice to the consumer, demanding fees because of that violation. One type of violation for which Respondent issues a parking notice occurs when a consumer parks their vehicle in the Operator's lot and creates an obligation to pay the Operator an hourly parking rate. If the consumer subsequently fails to pay the Operator the amount due by the specified deadline, the consumer defaults on their payment obligation and Respondent is prompted to issue a parking notice to collect fees stemming from that transaction.

12. Respondent included in its response a copy of the contract dated March 17, 2022, between Respondent and the Operator for the parking facility where the Complainant's vehicle was parked. According to the contract, Respondent is responsible for issuing, managing and collecting parking notices from consumers who violate the terms and conditions of the parking lot rules. The contract specifies that the Operator is responsible for providing and posting signage at all parking locations where Respondent provides parking enforcement services. Respondent provided a sample of a posted sign outside one of the lots serviced by Respondent. The signage informs consumers that they are entering a contract with the facility and must comply with the facility's rules. The sign states that consumers must be authorized to park or pay a base parking fee within ten minutes of entering the lot, the facility is monitored and enforced by Respondent, and that failure to comply with the facility's rules will be subject to additional fees.

13. According to the contract between Respondent and the Operator, Respondent offers parking lot monitoring, frictionless parking software, dispute processing of violation fees, management of violation records, and payment processing for violation fees in addition to the issuance and collection of parking notices and associated fees. Respondent does not receive or process base parking fees on current accounts. Respondent is required to provide the Operator with a detailed accounting of all parking notices issued. Additionally, all collection services conducted by Respondent are directed and approved by the Operator.

14. As payment for services rendered, the contract between Respondent and the Operator provides for a contingency-based structure where Respondent retains a percentage of the violation fees collected, while the remaining funds are owed to and sent to the Operator.

15. On February 21, 2024, the Department sent an email to Respondent, informing it that after reviewing the contract between Respondent and the Operator, parking notices and responses provided by Respondent, the Department determined that it meets the definition of a consumer collection agency as defined under Section 36a-800(3) of the Connecticut General Statutes and has engaged in unlicensed consumer collection activity. The email explained that Respondent's authority to collect violation fees is

derived from the contractual agreement with the Operator, who is the original creditor, and Respondent initiates the collection of violation fees only when a consumer's base parking fee is already in default. Therefore, the Department instructed Respondent to cease its collection activities in Connecticut until a consumer collection agency license is obtained. To date, Respondent has not confirmed that it has ceased collection activities in Connecticut, nor has it applied to become licensed as a consumer collection agency in Connecticut. Additionally, the Department requested a list of all Connecticut collection transactions conducted by Respondent within the past twenty-four months.

16. On April 1, 2024, the Department received a response from Respondent asserting that it does not consider itself a consumer collection agency. Included in its response, Respondent provided a list of its collection activities in Connecticut, indicating that it collected approximately \$184,163 from 2,265 Connecticut consumers between March 1, 2022 and March 15, 2024. For at least one Connecticut account, Respondent charged the consumer \$89.50, for a parking violation fee which originated from a \$6 parking obligation, and another \$89.50 for a \$12 parking obligation. This resulted in fees amounting to approximately 1,491% and 745%, respectively, of the original amounts.

17. Respondent is a licensed consumer collection agency in the state of Colorado. On August 29, 2023, Respondent entered into a Stipulation and Final Agency Order ("Order") with the Administrator of the Colorado Fair Debt Collection Practices Act ("CFDCPA") and Colorado Attorney General to settle alleged violations of the CFDCPA and the Colorado Consumer Protection Act. The Order alleged that Respondent collected or attempted to collect from consumers an amount not due, a violation of the CFDCPA. Notably, the allegation was based, in part, on the determination that Respondent acted as a consumer collection agency after its consumer collection agency license expired and imposed fees on the parking notices it issued to consumers ranging from \$80 to \$88 dollars because of the consumers' non-compliance with parking lot rules. Consumers did not owe the fees imposed by Respondent at the time of the original parking transactions.

### **III. STATUTORY BASIS FOR ORDER TO CEASE AND DESIST AND IMPOSITION OF CIVIL PENALTY**

18. Respondent's acting within this state as a consumer collection agency without a consumer collection agency license, as more fully described in paragraphs 8 through 17, inclusive, constitutes at least one violation of Section 36a-801(a) of the Connecticut General Statutes. Such violation forms the basis to issue an order to make restitution pursuant to Sections 36a-804(b) and 36a-50(c) of the Connecticut General Statutes, issue an order to cease and desist against Respondent pursuant to Sections 36a-804(b) and 36a-52(a) of the Connecticut General Statutes, and to impose a civil penalty upon Respondent pursuant to Sections 36a-804(b) and 36a-50(a) of the Connecticut General Statutes. Section 36a-50(a) of the Connecticut General Statutes authorizes the Commissioner to impose a civil penalty upon Respondent in an amount not to exceed One Hundred Thousand Dollars (\$100,000) per violation.

19. Respondent charged at least one Connecticut debtor a collection fee in excess of 15% of the amount collected, as more fully described in paragraphs 8 through 17, inclusive, in violation of Section 36a-805(a)(12) of the Connecticut General Statutes. Such violation forms the basis to issue an order to make restitution pursuant to Sections 36a-804(b) and 36a-50(c) of the Connecticut General Statutes, issue an order to cease and desist against Respondent pursuant to Sections 36a-804(b) and 36a-52(a) of the Connecticut General Statutes, and to impose a civil penalty upon Respondent pursuant to Sections 36a-804(b) and 36a-50(a) of the Connecticut General Statutes. Section 36a-50(a) of the Connecticut General Statutes authorizes the Commissioner to impose a civil penalty upon Respondent 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 Respondent to cease and desist from violating Sections 36a-801(a) and 36a-805(a)(12) of the Connecticut General Statutes, and requiring Respondent to take such action as set forth herein to effectuate the purposes of Section 36a-52(b) of the Connecticut General Statutes, in that the interests of

Connecticut consumer debtors are being prejudiced by Respondent's collecting and attempting to collect debts of Connecticut consumer debtors without a consumer collection agency license in Connecticut.

**V. TEMPORARY ORDER TO CEASE AND DESIST, 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 Respondent has engaged in acts or conduct which forms a basis to issue an order to make restitution against Respondent pursuant to Sections 36a-804(b) and 36a-50(c) of the Connecticut General Statutes, an order to cease and desist against Respondent pursuant to Sections 36a-804(b) and 36a-52(a) of the Connecticut General Statutes, and to impose a civil penalty upon Respondent pursuant to Sections 36a-804(b) and 36a-50(a) of the Connecticut General Statutes;

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

**THE COMMISSIONER THEREFORE ORDERS**, pursuant to the authority granted in Section 36a-52(b) of the Connecticut General Statutes, that Parking Revenue Recovery Service, Inc. a/k/a Parking Revenue Recovery Services, Inc. immediately **CEASE AND DESIST** from engaging in the business of a consumer collection agency in this state without obtaining the required license in violation of Sections 36a-801(a) and 36a-805(a)(12) of the Connecticut General Statutes. This Temporary Order to Cease and Desist shall become effective upon receipt by Parking Revenue Recovery Service, Inc. a/k/a Parking Revenue Recovery Services, Inc. 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 to Cease and Desist.

**THE COMMISSIONER FURTHER ORDERS**, pursuant to the authority granted in Sections 36a-17 and 36a-52(b) of the Connecticut General Statutes, that: Not later than fourteen (14) days from receipt of this Temporary Order to Cease and Desist, Order to Make Restitution, Notice of Intent to Issue Order to Cease and Desist, Notice of Intent to Impose Civil Penalty and Notice of Right to Hearing,

Parking Revenue Recovery Service, Inc. a/k/a Parking Revenue Recovery Services, Inc. shall provide to Swarupa Madhavan, Paralegal, Consumer Credit Division, Department of Banking, 260 Constitution Plaza, Hartford, Connecticut 06103-1800, or swarupa.madhavan@ct.gov,

- (a) An itemized list of all Connecticut consumer collection activity, including any fees or debt it collected, attempted to collect on, or received monies for, since March 1, 2022, including: (a) the name, address and telephone number of each consumer debtor, (b) the date that parking notices were issued by Parking Revenue Recovery Service, Inc. a/k/a Parking Revenue Recovery Services, Inc., and (c) full itemization of each consumer debtor's payments made since March 1, 2022, specifying the dates, amounts and to whom such payments were made, including any fees paid to Parking Revenue Recovery Service, Inc. a/k/a Parking Revenue Recovery Services, Inc.
- (b) Any derogatory credit reporting Parking Revenue Recovery Service, Inc. a/k/a Parking Revenue Recovery Services, Inc. placed on Connecticut consumer debtor accounts since March 1, 2022.

**THE COMMISSIONER FURTHER ORDERS**, pursuant to Section 36a-50(c) of the Connecticut General Statutes that Parking Revenue Recovery Service, Inc. a/k/a Parking Revenue Recovery Services, Inc. **MAKE RESTITUTION** of any sums obtained as a result of Parking Revenue Recovery Service, Inc. a/k/a Parking Revenue Recovery Services, Inc. violating Sections 36a-801(a) and 36a-805(a)(12) of the Connecticut General Statutes, plus interest at the legal rate set forth in Section 37-1 of the Connecticut General Statutes since March 1, 2022. Specifically, the Commissioner **ORDERS** that: Not later than thirty (30) days from the date this Order to Make Restitution becomes permanent, Parking Revenue Recovery Service, Inc. a/k/a Parking Revenue Recovery Services, Inc. shall promptly refund all payments made by Connecticut consumers that were collected by Parking Revenue Recovery Service, Inc. a/k/a Parking Revenue Recovery Services, Inc. since March 1, 2022, and provide evidence of such refund to Swarupa Madhavan, Paralegal, Consumer Credit Division, Department of Banking, 260 Constitution Plaza, Hartford, Connecticut 06103-1800, or swarupa.madhavan@ct.gov.

**NOW THEREFORE**, notice is hereby given to Respondent that the Commissioner intends to issue an order requiring Respondent to **CEASE AND DESIST** from violating Sections 36a-801(a) and

36a-805(a)(12) of the Connecticut General Statutes, and to impose a **CIVIL PENALTY** upon Respondent as set forth herein, subject to Respondent's right to a hearing on the allegation set forth above.

A hearing will be granted to 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](mailto:DOB.hearingsupport@ct.gov) within fourteen (14) days following Respondent's receipt of this Temporary Order to Cease and Desist, Order to Make Restitution, Notice of Intent to Issue Order to Cease and Desist, Notice of Intent to Impose Civil Penalty and Notice of Right to Hearing as set forth in Sections 36-50(c), 36a-52(a) and 36a-50(a) of the Connecticut General Statutes. This Temporary Order to Cease and Desist, Order to Make Restitution, Notice of Intent to 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 Respondent will not be represented by an attorney at the hearing, please complete the Appearance and Request for Hearing Form as "pro se".

If a hearing is requested, it will be held in person at the Department's offices. Once a written request for a 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. At the discretion of the Hearing Officer, for good cause shown, the Hearing Officer may approve requests for remote participation in the hearing by a Respondent, witness, or attorney. If such requests are approved by the Hearing Officer, such remote participation will be conducted via videoconference. If a hearing is requested, the hearing will be held on August 27, 2025, at 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 Respondent fails to appear at the requested hearing. At such

hearing, Respondent 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. Remote participation in a hearing will be held in accordance with Section 1-225a of the Connecticut General Statutes, and the Remote Hearing Guidelines available on the Department's website at <https://portal.ct.gov/dob>.

If Respondent does not request a hearing within the time prescribed or fails to appear at any such hearing, the allegations herein will be deemed admitted. Accordingly, the Order to Make Restitution shall remain in effect and become permanent, and the Commissioner will issue an order that Respondent cease and desist from violating Sections 36a-801(a) and 36a-805(a)(12) of the Connecticut General Statutes, may order a civil penalty in an amount not to exceed One Hundred Thousand Dollars (\$100,000) per violation be imposed upon Respondent.

Dated at Hartford, Connecticut,  
This 1st day of July 2025.

/s/  
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Jorge L. Perez  
Banking Commissioner

## CERTIFICATION

I hereby certify that on this 2nd day of July 2025, the foregoing Temporary Order to Cease and Desist, Order to Make Restitution, Notice of Intent to Issue Order to Cease and Desist, Notice of Intent to Impose Civil Penalty and Notice of Right to Hearing was sent by certified mail, return receipt requested, to Parking Revenue Recovery Service, Inc. a/k/a Parking Revenue Recovery Services, Inc., at 12381 E Cornell Avenue, Aurora, Colorado 80014, Certified Mail No. 70222410000095982838, and 6025 S. Quebec St., Suite 350, Greenwood Village, Colorado 80111, Certified Mail No. 70222410000095982845

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/s/  
Swarupa Madhavan  
Paralegal