
*
IN THE MATTER OF: *
*
BUYERS HOLDINGS, LLC *
NMLS # 1706706 *
(“Respondent”) *

ORDER TO CEASE AND DESIST
AND
ORDER IMPOSING CIVIL PENALTY

I. PRELIMINARY STATEMENT

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 (“Regulations”);

WHEREAS, pursuant to the authority granted by Section 36a-17 of the Connecticut General Statutes, the Commissioner, through the Consumer Credit Division (“Division”) of the Department of Banking (“Department”), has investigated the activities of Respondent to determine if it has violated, was violating or was about to violate the provisions of the Connecticut General Statutes or the Regulations within the jurisdiction of the Commissioner;

WHEREAS, on February 26, 2026, the Commissioner issued a 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 (collectively, “Order and Notice”) against Respondent, which Order and Notice is incorporated herein by reference;

WHEREAS, on February 26, 2026, the Order and Notice was caused to be mailed by certified mail, return receipt requested, to Respondent (Certified Mail Nos. 7014 3490 0002 3525 8940 and 7014 3490 0002 3525 8957);

WHEREAS, the Order and Notice mailed to Respondent via Certified Mail No. 7014 3490 0002 3525 8957 was returned to the Department marked “Return to Sender – Unclaimed – Unable to Forward” on March 20, 2024;

WHEREAS, the Order and Notice mailed via Certified Mail No. 7014 3490 0002 3525 8940 was returned to the Department marked “Return to Sender – Not Deliverable as Addressed – Unable to Forward” on March 16, 2025;

WHEREAS, the Order and Notice issued against Respondent was deemed received on the earlier of the date of actual receipt, or seven days after mailing or sending, pursuant to Sections 36a-52(a), 36a-50(a) and 36a-50(c) of the Connecticut General Statutes;

WHEREAS, the Order and Notice provided Respondent with the opportunity for a hearing, and stated that if a hearing was not requested by Respondent within 14 days of its receipt or if Respondent failed to appear at any such hearing, the allegations against Respondent contained in the Order and Notice would be deemed admitted, the Order to Make Restitution shall remain in effect and become permanent, and the Commissioner would issue an order that Respondent cease and desist from violating Sections 36a-53a and 36a-801(a) of the Connecticut 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 Respondent;

WHEREAS, Respondent failed to request a hearing within the prescribed time period;

WHEREAS, the Commissioner alleged in the Order and Notice, with respect to the activity described therein, that: (1) Respondent’s acting within this state as a consumer collection agency without a consumer collection agency license constitutes at least 12 violations of Section 36a-801(a) of the Connecticut General Statutes; and (2) Respondent’s statement that it did not engage in unlicensed consumer collection activity in Connecticut constitutes a statement which is, at the time and in the light of the circumstances under which it is made, false or misleading in a material respect, in violation of Section 36a-53a of the Connecticut General Statutes. Such violations form 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;

WHEREAS, also in the Order and Notice, the Commissioner ordered, pursuant to Section 36a-50(c) of the Connecticut General Statutes, that not later than thirty (30) days from the date the Order to Make Restitution becomes permanent, that Respondent promptly refund all payments made by Connecticut consumers that were collected by Respondent, plus interest at the legal rate set forth in Section 37-1 of the Connecticut General Statutes, since January 1, 2016, and provide to the Division evidence of such refunds;

WHEREAS, Section 36a-52(a) of the Connecticut General Statutes provides, in pertinent part, that “[i]f the person does not request a hearing within the time specified in the notice . . . , the commissioner shall issue an order to cease and desist against the person. No such order shall be issued except in accordance with the provisions of chapter 54”;

WHEREAS, Section 36a-50(a)(2) of the Connecticut General Statutes provides, in pertinent part, that “[i]f such person does not request a hearing within the time specified in the notice . . . , the commissioner may, as the facts require, order that a civil penalty not exceeding one hundred thousand dollars per violation be imposed upon such person”;

WHEREAS, Section 36a-50(a)(3) of the Connecticut General Statutes provides that “[e]ach action undertaken by the commissioner under this subsection shall be in accordance with the provisions of chapter 54”;

AND WHEREAS, Section 36a-1-31(a) of the Regulations provides, in pertinent part, that “[w]hen a party fails to request a hearing within the time specified in the notice, the allegations against the party may be deemed admitted. Without further proceedings or notice to the party, the commissioner shall issue a final decision in accordance with Section 4-180 of the Connecticut General Statutes and Section 36a-1-52 of the Regulations of Connecticut State Agencies”.

II. FINDINGS OF FACT AND CONCLUSIONS OF LAW

1. The Commissioner finds that the matters asserted, as set forth in paragraphs 6 through 14, inclusive, of Section II of the Order and Notice, shall constitute findings of fact within the meaning of Section 4-180(c) of the Connecticut General Statutes, and that the conclusions, as set forth in paragraphs 15 and 16, inclusive, of Section III of the Order and Notice, shall constitute conclusions of law within the meaning of Section 4-180(c) of the Connecticut General Statutes and Section 36a-1-52 of the Regulations.

2. The Commissioner finds that Respondent has engaged in acts or conduct which forms the basis to issue an order to cease and desist pursuant to Section 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.

3. The Commissioner finds that the Order and Notice was given in compliance with Sections 36a-52(a), 36a-50(a), 36a-50(c) and 4-177 of the Connecticut General Statutes.

III. ORDER

Having read the record, **I HEREBY ORDER**, pursuant to Sections 36a-804(b), 36a-52(a), 36a-50(a) and 36a-50(c) of the Connecticut General Statutes, that:

1. Buyers Holdings, LLC **CEASE AND DESIST** from violating Sections 36a-53a and 36a-801(a) of the Connecticut General Statutes;
2. A **CIVIL PENALTY** of Two Hundred Thousand Dollars (\$200,000) be imposed upon Buyers Holdings, LLC, to be remitted to the Department of Banking by electronic funds transfer, cashier's check, certified check or money order made payable to "Treasurer, State of Connecticut", no later than forty-five (45) days from the date this Order is mailed;
3. The **ORDER TO MAKE RESTITUTION** issued on February 26, 2026, remains in effect and became permanent against Buyers Holdings, LLC on March 19, 2026; and
4. This Order shall become effective when mailed.

Dated at Hartford, Connecticut,
This 9th day of April 2026.

/s/

Jorge L. Perez
Banking Commissioner

This Order was sent by certified mail, return receipt requested, to Respondent on April 10, 2026.

Buyers Holdings, LLC
Attention: David Mizrahi, President
3030 N. Rocky Point Dr., Ste. 150A
Tampa, Florida 33607
Certified Mail No. 7015 1730 0002 2411 3755

Buyers Holdings, LLC
11601 Biscayne Blvd, Ste. 306
North Miami, Florida 33181
Certified Mail No. 7015 1730 0002 2411 3762