IN THE MATTER OF:		
CLARITY DEBT RESOLUTION, INC **NMLS # 2332349**		**CONSENT ORDER**
("Clarity" or "Respondent")		

WHEREAS, the Banking Commissioner ("Commissioner") is charged with the administration of Part II of Chapter 669, Sections 36a-671 to 36a-671f, inclusive, of the Connecticut General Statutes, "Debt Adjusters and Debt Negotiation", as amended;

WHEREAS, Respondent is a California corporation with an office located at 17875 Von Karman Ave, Suite 150-250, Irvine, California;

WHEREAS, Respondent has never been licensed to engage in or offer to engage in debt negotiation in Connecticut;

WHEREAS, as a result of information obtained during an examination of a consumer collection agency licensee, the Commissioner, through the Consumer Credit Division of the Department of Banking, conducted an investigation into the activities of Respondent, pursuant to the authority granted by 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 within the jurisdiction of the Commissioner ("Investigation");

WHEREAS, as a result of such Investigation, the Commissioner alleges that from at least June 2023 to the present, Respondent has violated Section 36a-671(b) of the Connecticut General Statutes;

WHEREAS, the Commissioner believes that such allegation would support initiation of enforcement proceedings against Respondent, including, without limitation, proceedings to issue an order to make restitution against Respondent pursuant to Sections 36a-671a(b) and 36a-50(c) of the Connecticut General Statutes, to cease and desist against Respondent pursuant to Sections 36a-671a(b) and 36a-52(a) of the Connecticut General Statutes, and to impose a civil penalty upon Respondent pursuant to Sections 36a-671a(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 Respondent acknowledge the possible consequences of formal administrative proceedings, and Respondent 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 contained herein;

WHEREAS, the Commissioner and Respondent now desire to fully resolve the matter alleged herein;

WHEREAS, Respondent represents that based on its records and reasonable investigation, it has only engaged in activity, which the Commissioner alleges to be in violation of Section 36a-671(b) of the Connecticut General Statutes, on behalf of fourteen (14) Connecticut residents and that such Connecticut residents were erroneously enrolled by third-party entities against Respondent's contractual provisions with such entities disallowing any enrollment of Connecticut residents;

WHEREAS, Respondent represents that it has conducted a reasonable review of fees paid by Connecticut residents to Respondent for debt negotiation services, provided refunds of all fees identified from the review and has ceased all conduct alleged by the Commissioner to be in violation of Section 36a-671(b) of the Connecticut General Statutes;

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

WHEREAS, Respondent has updated its website to prominently disclose that Respondent does not perform debt negotiation in Connecticut;

WHEREAS, Respondent 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, Respondent 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, Respondent herein represents to the Commissioner that it has reviewed and updated its internal policies, procedures and controls for purposes of ensuring compliance with Section 36a-671(b) of the Connecticut General Statutes;

WHEREAS, Respondent represents that such policies and procedures reasonably ensure that absent a debt negotiation license by Respondent in Connecticut, no Connecticut resident will be enrolled with Respondent for debt negotiation services, either directly or indirectly, except that Respondent may continue to support Connecticut licensed attorneys in the provision of debt negotiation services to Connecticut debtors in accordance with *Persels & Associates, LLC v. Banking Commissioner,* 318 Conn. 652 (2015) and *Commonwealth Servicing Group, LLC v. Dept. of Banking,* 351 Conn. 701 (2025);

WHEREAS, Respondent represents that, based on the address information provided by the consumer to Respondent, it does not offer, solicit, broker, directly or indirectly arrange, place or find small loans for a prospective Connecticut borrower, or engage in any other activity intended to assist a prospective Connecticut borrower in obtaining a small loan, including, but not limited to, generating leads;

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

1. Respondent shall not violate Section 36a-671(b) of the 2026 Supplement to the General Statutes, including offering debt negotiation services in Connecticut without obtaining the required license;

2. No later than the date this Consent Order is executed by Respondent, 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 Seven Thousand Six Hundred Dollars ($7,600) as a civil penalty; and

3. No later than the date this Consent Order is executed by Respondent, 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 Two Thousand Four Hundred Dollars ($2,400) 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 Respondent based upon the allegation set forth herein; provided that issuance of this Consent Order is without prejudice to the right of the Commissioner to take enforcement action against Respondent based upon a violation of this Consent Order or the allegations underlying its entry, if the Commissioner determines that compliance with the terms herein is not being observed or if any material representation made by Respondent and reflected herein is subsequently discovered to be untrue;

3. Subject to the foregoing, and so long as this Consent Order is disclosed within the time as required by NMLS and applicable law by Respondent and its control persons on NMLS, as applicable, nothing in the issuance of this Consent Order shall adversely affect the ability of Respondent to apply for or obtain initial license or renewal licenses under Part II of Chapter 669, Sections 36a-671 *et seq.*, of the Connecticut General Statutes, as amended, provided that all applicable legal requirements for any such licenses are satisfied and the terms of this Consent Order are being followed;

4. This Consent Order shall be binding upon Respondent and its successors and assigns;

5. This Consent Order shall become final when issued; and

6. This Consent Order is entered without admission of liability or violation by Respondent and shall not constitute a finding of fact or law, except for purposes of enforcing this Consent Order.

Issued at Hartford, Connecticut
this 14 day of August 2026.

_/s/______________________________________
Jorge L. Perez
Banking Commissioner

I, Ghulam Hashimi, state on behalf of Clarity Debt Resolution, Inc 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 Clarity Debt Resolution, Inc; that Clarity Debt Resolution, Inc agrees freely and without threat or coercion of any kind to comply with the sanctions entered and terms and conditions ordered herein; and that Clarity Debt Resolution, Inc 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: Ghulam Hashimi
Title: General Counsel
Clarity Debt Resolution, Inc

State of: ______________________

County of: _______________________

On this the ____________ day of ________________2026, before me, ____________________, the undersigned officer, personally appeared ________________, who acknowledged himself/herself to be the ____________ of Clarity Debt Resolution, Inc a corporation, and that he/she as such ________, being authorized so to do, executed the foregoing instrument for the purposes therein contained, by signing the name of the corporation by himself/herself as ________________.

In witness whereof I hereunto set my hand.

_/s/____________________________________
Notary Public Jon Fotopoulos
Date Commission Expires: July 13, 2027