
*
IN THE MATTER OF: *
*
COMPLETE CREDIT *
SOLUTIONS, INC. *
*
(“CCS”) *
*

CONSENT ORDER

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, CCS is a Texas corporation with an office located at 1011 Surrey Ln Bldg. 200, Flower Mound, Texas;

WHEREAS, CCS has never been licensed to act as a consumer collection agency 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, pursuant to Section 36a-17 of the Connecticut General Statutes, into the activities of CCS 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 from at least September 2023 to December 2024, CCS acted as a consumer collection agency in Connecticut without a

license by engaging in the business of debt buying, 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 CCS, including, without limitation, proceedings to issue an order to cease and desist against CCS 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 CCS 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 CCS acknowledge the possible consequences of formal administrative proceedings, and CCS 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, CCS 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 CCS now desire to resolve the matter set forth herein;

WHEREAS, CCS specifically assures the Commissioner that it has ceased all consumer collection activity in Connecticut, including writing off or otherwise selling all Connecticut accounts to consumer collection agencies, including debt buyers, licensed in Connecticut as of the date of the sale, and that the violations alleged herein shall not occur in the future;

WHEREAS, CCS 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, CCS herein represents that it has reviewed and updated its internal policies, procedures and controls to ensure that the violations alleged herein do not occur in the future, including to ensure that upon learning that a consumer debtor resides in Connecticut, CCS and any consumer collection agency hired by CCS to collect or receive payment on CCS's behalf will immediately cease all further collection activity;

WHEREAS, CCS herein represents that it has updated its website to prominently display that it is not licensed to act as a consumer collection agency in Connecticut, and has disabled the website's payment processing feature for Connecticut consumers;

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

1. CCS shall cease and desist from acting as a consumer collection agency in Connecticut without the required license, including by engaging in the business of debt buying, in violation of Section 36a-801(a) of 2026 Supplement to the General Statutes; and
2. Based on financial statements submitted to the Division, the imposition of any civil penalty that otherwise would have been imposed against CCS pursuant to Sections 36a-804(b) and 36a-50(a) of the Connecticut General Statutes shall be temporarily stayed for three years from the date this Consent Order is issued by the Commissioner, provided that such stay shall no longer be in force and effect, and CCS shall pay a civil penalty of Ten Thousand Dollars (\$10,000), if the Commissioner ascertains at any time that: (a) the payment of such civil penalty would no longer result in demonstrable financial hardship to CCS; (b) CCS failed to disclose any material asset, materially misstated the value of any asset or made any other material misstatement or omission in its financial statements; or (c) fails to submit the annual financial statements required by this paragraph. CCS, through its execution of this Consent Order, knowingly, wilfully and voluntarily waives its right to notice and an administrative hearing in conjunction with the implementation of this paragraph; provided, however, that, prior to the lifting of the stay pursuant to this paragraph, the Commissioner shall provide CCS with notice of the required payment of the civil penalty and an informal opportunity to demonstrate its inability to pay. Any such civil penalty shall be in addition to any other remedies that the Commissioner may seek for a violation of this Consent Order by CCS. CCS

shall provide updates to the Division by submitting annual financial statements no later than October 1, 2027, October 1, 2028 and October 1, 2029. Absent any action by the Commissioner to lift the stay, CCS's obligation to pay the stayed civil penalty shall be vacated three years from the date this Consent Order is issued by the Commissioner without any further action or notice by the Commissioner.

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 CCS 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 CCS 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 CCS and reflected herein is subsequently discovered to be untrue;
3. Subject to the foregoing, and so long as this Consent Order is promptly disclosed by CCS and its control persons on NMLS, as applicable, nothing in the issuance of this Consent Order shall adversely affect the ability of CCS to apply for or obtain 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 licenses are satisfied and the terms of this Consent Order are being followed;
4. This Consent Order shall be binding upon CCS and its successors and assigns; and
5. This Consent Order shall become final when issued.

Issued at Hartford, Connecticut
this 28th day of September, 2026.

/s/
Jorge L. Perez
Banking Commissioner

I, Bil Edwards, state on behalf of Complete Credit Solutions, 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 Complete Credit Solutions, Inc.; that Complete Credit Solutions, 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 Complete Credit Solutions, 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:
Title: President
Complete Credit Solutions, Inc.

State of: Texas

County of: Denton

On this the 25th day of September 2026, before me, Mariam D. Ortega, the undersigned officer, personally appeared Bil Edwards, who acknowledged himself/herself to be the President, of Complete Credit Solutions, Inc., a corporation, and that he/she as such President, 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 President.

In witness whereof I hereunto set my hand.

/s/
Notary Public
Date Commission Expires: 2/6/2029