* *	**TEMPORARY ORDER TO CEASE AND DESIST**
IN THE MATTER OF:	
SPIRE RECOVERY SOLUTIONS LLC **d/b/a SPIRE** **d/b/a SPIRE RECOVERY SOLUTIONS** **NMLS # 1374673**	**NOTICE OF INTENT TO REVOKE CONSUMER COLLECTION AGENCY LICENSE**
("Respondent")	**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", as amended, 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 examined 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 ("Examination").

3. As a result of the Examination, the Commissioner has reason to believe that Respondent has violated Section 36a-17(e) of the Connecticut General Statutes and Sections 36a-801(a) and 36a-801(c)(2) of the Connecticut General Statutes in effect at such time.

4. As a result of the Examination, the Commissioner finds that the public welfare requires immediate action to issue a temporary order to cease and desist against Respondent from violating Section 36a-17(e) of the Connecticut General Statutes and Section 36a-801(c)(2) of the 2026 Supplement to the General Statutes, pursuant to Section 36a-52(b) of the Connecticut General Statutes.

5. As a result of the Examination, the Commissioner finds that sufficient grounds exist to revoke Respondent's license to act as a consumer collection agency in Connecticut pursuant to Section 36a-804(a) of the Connecticut General Statutes and subsections (a) and (b) of Section 36a-51 of the 2026 Supplement to the General Statutes.

6. As a result of the Examination, 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 Examination, 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 New York limited liability company with a main office at 57 Canal Street, Suite 302, Lockport, New York.

9. Respondent has been licensed to act as a consumer collection agency in Connecticut since August 24, 2021, until its license expired on January 1, 2026.

10. On December 20, 2024, the Department commenced the Examination of Respondent for the review period September 1, 2022, through September 30, 2024.

11. The Department informed Meghann Helsdon, Respondent's primary contact on the Nationwide Multistate Licensing System and Registry ("NMLS") by e-mail dated December 5, 2024, of the upcoming Examination. The e-mail was unanswered. Subsequently, the Department informed Mr. Rodney Giove, Legal Counsel/Compliance Officer, through e-mail on December 16, 2024, of the upcoming Examination.

12. Pursuant to the authority granted by Sections 36a-17(a) and 36a-801of the Connecticut General Statutes, on February 27, 2025, the Department sent Respondent a Compliance Letter via email to Rodney Giove and the primary contact person listed on NMLS, Megann Helsdon, Office Manager, providing Respondent with the opportunity to show compliance with all lawful requirements as requested in the Examination requests;

13. During the Examination, the Department discovered in Respondent's account notes, calls associated with a Dallas, Texas area code. Respondent's company profile on the Better Business Bureau's website reported a Dallas, Texas address not reflected in Connecticut's licensing records on NMLS and, that, on at least one (1) occasion, Respondent's representative stated they were located in Dallas, Texas. Based upon this information, the Department requested further information and documentation regarding collection calls originating from Dallas, Texas on February 4, 2025, Respondent's management and employee chart indicating where specified employees worked on February 7, 2025, documentation evidencing consent given by Connecticut consumers for e-mail communications on February 11, 2025, through the State Examination System ("SES"). On February 8, 11, 12, 18, 21 and 22, 2025, the Department sent reminders to Respondent through SES.

14. Respondent failed to respond to any of the SES notifications.

15. On February 20, 2025, the Department sent a reminder e-mail to Respondent with a due date of February 24, 2025, notifying Respondent that the information and document responses were incomplete and past due. On February 27, 2025, the Department notified Respondent regarding its failure to provide the requested information and documentation.

16. Respondent consistently submitted incomplete responses to the Department's requests for information and specifically submitted only partial responses to the general requests by the Department on January 14, 2025, February 28, 2025, March 4, 2025, March 14, 2025, and March 27, 2025. On May 23, 2025, the Department sent to Respondent the Report of Examination ("ROE") through SES and required Respondent to provide a response for the findings in the ROE by June 22, 2025.

17. On June 15, 2025, and June 20, 2025, the Department, via SES sent automatic reminders of the June 22, 2025, response due date to Respondent. Since Respondent failed to respond, the Department sent an e-mail on July 2, 2025, to Meghann Helsdon and Rodney Giove informing Respondent's failure to cooperate and extension of the deadline until July 11, 2025.

18. Respondent partially responded to the ROE on September 23, 2025, December 3, 2025, December 31, 2025, March 3, 2026, and March 11, 2026.

19. Respondent failed to produce sufficient information regarding its failure to obtain consent for e-mail communication with consumers and failed to produce sufficient information in connection with unlicensed collection activities originating from its unlicensed branch office location in Texas.

20. The Department requested Respondent to identify each remote office location several times during the course of and following the Examination, which Respondent failed to provide and remains outstanding as of the date of this Notice.

21. On January 6, 2025, Respondent provided a response to the Department's information request that all consumer collection activities occurred from the office and that no remote work was permitted. On February 5, 2025, telephone call Respondent represented that some consumer collection activities occur remotely and it did not have an office in Texas.

22. Respondent provided conflicting responses and information throughout the Examination regarding a branch office in Texas.

23. On March 4, 2025, Respondent provided a collector list indicating individuals engaged in collection activities from remote locations, however Respondent failed to provide location information for each collector as requested.

24. In a review of a telephone recording of a Connecticut consumer provided on January 6, 2025, the Department heard a collector state to a debtor that Respondent was "SRS" and that "we are a corporate office located in Dallas, Texas". The collector in the telephone call reviewed was not identified as a remote employee on the list Respondent provided on March 4, 2025.

25. The Department reviewed information from the Better Business Bureau ("BBB"), which identified an address at Richardson, Texas to Respondent. Finally, on March 27, 2025, Respondent acknowledged that Respondent has a branch office in Texas and shall require branch license for the Texas location. On October 22, 2025, Respondent submitted a consumer collection agency branch license application on NMLS for the Texas location.

26. Respondent failed to provide the policies and procedures implemented to ensure reasonable supervision over its remote office activities.

27. Respondent failed to provide records including the safeguards and controls established concerning personal information and data security at the remote office location consistent with existing requirements at licensed locations and applicable state and federal law, including, but not limited to, utilizing a virtual private network (VPN) or comparable system that ensures secure connectivity and requires passwords or other forms of authentication to access records, and ensuring that appropriate security updates, patches or other alterations to the security of all devices used at remote office locations are installed and maintained.

28. During the Examination, Respondent produced to the Department eleven (11) letter templates, including, but not limited to, a collection letter, verified fraud letter, settlement offer letter, settled in full letter and various dispute letters. None of the letter templates were identified by number or title on the letters themselves as required by Section 36a-809-9(a) of the Regulations.

29. Respondent's Credit Reporting Policy states that "[i]t is the policy of [Respondent] to not credit report the accounts it acquires". Respondent also indicated in its response to the Department's information request pursuant to the Examination that it does not credit report.

30. The Account Paid-In-Full letter template produced by Respondent states that an account paid in full will be reported to the major credit bureaus and the Department reviewed at least two (2) actual consumer letters that included that statement.

31. Based on the Department's review, the statements in Respondent's reporting policy and the paid-in-full letter are in direct contradiction to each other and are therefore misleading.

32. Respondent provided templates of text messages used which failed to contain a clear conspicuous opt-out notice as required pursuant to 12 CFR Part 1006.6(e) of Regulation F of Fair Debt Collection Practices Act ("FDCPA"). During the Examination, Respondent indicated that the opt-out notice is auto populated when a text is sent, which could not be verified by the Department because actual text messages were not retained as required by Section 36a-811(a) of the Connecticut General Statutes.

33. One of the banking accounts provided by Respondent, which was used to deposit Connecticut consumer payments and the remittance of those funds to the respective clients, was not titled as a trust account as required.

34. Respondent reported that it utilized two (2) separate entities as trust accounts for the collection of debt from Connecticut consumers and failed to identify those entities on NMLS.

35. The Department reviewed telephone recordings provided by Respondent and identified twenty-eight (28) telephone calls in which Respondent failed to state Respondent's legal name or an authorized fictitious name during the call instead used term such as "SRS" to identify itself to Connecticut consumers and "SRS" is not a fictitious name approved by the Commissioner.

36. Any payments deducted from a consumer's banking account, whether by check or debit card, must receive a post-dated letter notice and Respondent failed to send the post-dated payment notice on at least two (2) Connecticut accounts as required pursuant to Section 36a-809-12(2) of Regulations.

37. During a telephone call involving a Connecticut debtor on July 10, 2024, Respondent failed to disclose that Respondent is attempting to collect a debt and that any information obtained will be used for that purpose as required by Section 36a-809-11(11) of the Regulations.

38. Respondent's Emailing Consumers Policy states that: "[b]efore the debt collector used the email address to communicate with the consumer about the debt, the creditor sent the consumer a written or electronic notice, to an address the creditor obtained from the consumer and used to communicate with the consumer about the account, which clearly and conspicuously disclosed".

39. The Department discovered that, on at least eleven (11) occasions, Respondent's first attempt to communicate with consumers was by e-mail, without any consumer consent to e-mail communication

in the account. Respondent represents that consumer consent was obtained from the original creditor pursuant to Regulation F, Respondent is provided with the e-mail of the consumer upon placement of the account that was provided to the original creditor and if no e-mail address is attached to the account, it signifies that no e-mail consent was provided to the original consumer, or it was revoked at some point.

40. On May 8, 2024, Respondent received a telephone call from a Connecticut consumer debtor that disputed the amount of the debt and debt held by Respondent. Respondent failed to mark the account as in dispute, failed to provide the consumer with documentation validating the debt and continued collection activities after the debt being in dispute in violation of Respondent's own Verbal Dispute Documenting Policy.

41. Respondent engaged in collection activities on behalf of at least six (6) debt buyers who were not licensed to engage in consumer collection activities in this state, despite being required to be licensed.

42. On several instances, Respondent was unable to provide e-mails requested because Respondent failed to retain e-mails for two (2) years from their transmission as required by Section 36a-811(a) of the Connecticut General Statutes.

III. STATUTORY BASIS TO REVOKE CONSUMER COLLECTION AGENCY LICENSE, ORDER TO CEASE AND DESIST AND IMPOSITION OF CIVIL PENALTY

43. Respondent's acting as a consumer collection agency in this state from at least September 1, 2022, to October 22, 2025, through an unlicensed branch in Texas, as more fully described in paragraphs 20 through 25, inclusive, constitutes violations of Section 36a-801(a) of the Connecticut General Statutes in effect at such time. Such violations constitute sufficient grounds for the Commissioner to revoke Respondent's license to act as a consumer collection agency in Connecticut pursuant to Section 36a-804(a) of the Connecticut General Statutes and subsections (a) and (b) of Section 36a-51 of the 2026 Supplement to the General Statutes, and 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 and 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.

44. Respondent's failure to respond to the ROE, failure to timely cooperate with the Department and failure to timely produce requested records during the Examination, as more fully described in paragraphs 10 through 28, inclusive, constitutes multiple violations of Section 36a-17(e) of the Connecticut General Statutes. Such violation constitutes sufficient grounds for the Commissioner to revoke Respondent's license to act as a consumer collection agency in Connecticut pursuant to Section 36a-804(a) of the Connecticut General Statutes and subsections (a) and (b) of Section 36a-51 of the 2026 Supplement to the General Statutes, and forms 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 and 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.

44. Respondent's failure to provide a number or title on consumer collection letters in violation of Section 36a-809-9(a) of the Regulations as more fully described in paragraph 28 constitutes sufficient grounds for the Commissioner to revoke Respondent's license to act as a consumer collection agency in Connecticut pursuant to Section 36a-804(a) of the Connecticut General Statutes and subsections (a) and (b) of Section 36a-51 of the 2026 Supplement to the General Statutes, and forms 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 and 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.

45. Respondent's making false, deceptive or misleading representations in consumer communications in violation of Section 36a-809-11 of the Regulations as more fully described in paragraphs 29-31, inclusive and 40 constitutes sufficient grounds for the Commissioner to revoke Respondent's license to act as a consumer collection agency in Connecticut pursuant to Section 36a-804(a) of the Connecticut General Statutes and subsections (a) and (b) of Section 36a-51 of the 2026 Supplement to the General Statutes, and forms 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 and 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.

46. Respondent's failure to provide opt-out notice on text messages in violation of 12 CFR Part 1006.6(e) of Regulation F of FDCPA and Section 36a-812 of the Connecticut General Statutes as more fully described in paragraph 32 constitutes sufficient grounds for the Commissioner to revoke Respondent's license to act as a consumer collection agency in Connecticut pursuant to Section 36a-804(a) of the Connecticut General Statutes and subsections (a) and (b) of Section 36a-51 of the 2026 Supplement to the General Statutes, and forms 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 and 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.

47. Respondent's failure to identify banking account as "Client Funds or Trust" in violation of Section 36a-811(b) of the Connecticut General Statutes as more fully described in paragraph 33 constitutes sufficient grounds for the Commissioner to revoke Respondent's license to act as a consumer

collection agency in Connecticut pursuant to Section 36a-804(a) of the Connecticut General Statutes and subsections (a) and (b) of Section 36a-51 of the 2026 Supplement to the General Statutes, and forms 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 and 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.

48. Respondent's failure to update NMLS with all trust accounts in violation of Section 36a-801(f)(2) of the Connecticut General Statutes in effect at such time as more fully described in paragraph 34 constitutes sufficient grounds for the Commissioner to revoke Respondent's license to act as a consumer collection agency in Connecticut pursuant to Section 36a-804(a) of the Connecticut General Statutes and subsections (a) and (b) of Section 36a-51 of the 2026 Supplement to the General Statutes, and forms 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 and 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.

49. Respondent's failure to use legal name or fictitious name approved by Commissioner in collection communications in violation of Section 36a-801(i) of the Connecticut General Statutes in effect at such time as more fully described in paragraph 35 constitutes sufficient grounds for the Commissioner to revoke Respondent's license to act as a consumer collection agency in Connecticut pursuant to Section 36a-804(a) of the Connecticut General Statutes and subsections (a) and (b) of Section 36a-51 of the 2026 Supplement to the General Statutes, and forms 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 and 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.

50. Respondent's failure to send post-dated payment notice as required in violation of Section 36a-809-12(2) of the Regulations as more fully described in paragraph 36 constitutes sufficient grounds for the Commissioner to revoke Respondent's license to act as a consumer collection agency in Connecticut pursuant to Section 36a-804(a) of the Connecticut General Statutes and subsections (a) and (b) of Section 36a-51 of the 2026 Supplement to the General Statutes, and forms 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 and 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.

51. Respondent's failure to provide required consumer collection disclosures in violation of Section 36a-809-11(11) of the Regulations as more fully described in paragraph 37 constitutes sufficient grounds for the Commissioner to revoke Respondent's license to act as a consumer collection agency in Connecticut pursuant to Section 36a-804(a) of the Connecticut General Statutes and subsections (a) and (b) of Section 36a-51 of the 2026 Supplement to the General Statutes, and forms 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 and 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.

51. Respondent's failure to obtain required consent to communicate through e-mail in violation of 12 CFR 1006.6(d)(4)(ii) of Regulation F of FDCPA and Section 36a-812 of the Connecticut General

Statutes as more fully described in paragraphs 38 and 39 constitutes sufficient grounds for the Commissioner to revoke Respondent's license to act as a consumer collection agency in Connecticut pursuant to Section 36a-804(a) of the Connecticut General Statutes and subsections (a) and (b) of Section 36a-51 of the 2026 Supplement to the General Statutes, and forms 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 and 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.

52. Respondent's failure to enforce policies and procedures for supervising employees, agents and office operations that are reasonably designed to achieve compliance with applicable consumer collection laws and regulations in violation of Section 36a-805(a)(16) of the Connecticut General Statutes in effect at such time as more fully described in paragraphs 13 through 42, inclusive, constitutes sufficient grounds for the Commissioner to revoke Respondent's license to act as a consumer collection agency in Connecticut pursuant to Section 36a-804(a) of the Connecticut General Statutes and subsections (a) and (b) of Section 36a-51 of the 2026 Supplement to the General Statutes, and forms 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 and 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.

53. Respondent's engaging in collection activities on behalf of unlicensed third-party debt buyers caused by a failure to establish, enforce and maintain policies and procedures in violation of Section 36a-805(a)(16) of the Connecticut General Statutes in effect at such time as more fully described in paragraph 41 constitutes sufficient grounds for the Commissioner to revoke Respondent's license to act as a

consumer collection agency in Connecticut pursuant to Section 36a-804(a) of the Connecticut General Statutes and subsections (a) and (b) of Section 36a-51 of the 2026 Supplement to the General Statutes, and forms 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 and 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.

54. Respondent's failure to maintain consumer debtor and creditor records in violation of Section 36a-811(a) of the Connecticut General Statutes, as more fully described in paragraph 42 constitutes sufficient grounds for the Commissioner to revoke Respondent's license to act as a consumer collection agency in Connecticut pursuant to Section 36a-804(a) of the Connecticut General Statutes and subsections (a) and (b) of Section 36a-51 of the 2026 Supplement to the General Statutes, and forms 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 and 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.

55. The totality of the circumstances as stated in Paragraphs 43-54, inclusive, fails to warrant belief that the business will be operated soundly and efficiently, in the public interest and consistent with the purposes of sections 36a-800 to 36a-814, inclusive, and constitutes a violation of Section 36a-801(c)(2) of the Connecticut General Statutes in effect at such time. Such violations constitute sufficient grounds for the Commissioner to revoke Respondent's license to act as a consumer collection agency in Connecticut pursuant to Section 36a-804(a) of the Connecticut General Statutes and subsections (a) and (b) of Section 36a-51 of the 2026 Supplement to the General Statutes.

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), 36a-812, 36a-811(b), 36a-801(f)(2), 36a-801(i), 36a-805(a)(16), 36a-805(a)(16), 36a-811(a) and 36a-17(e) of the Connecticut General Statutes, 12 CFR Part 1006.6(e) of Regulation F of the FDCPA and Sections 36a-809-9(a), 36a-809-11, 36a-809-12(2) and 36a-809-11(11) of the Regulations, 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 debtors are being prejudiced by Respondent's failure to respond to the Department, failure to timely cooperate with the Department and failure to timely produce requested records and Respondent's failure to establish, enforce and maintain policies and procedures to comply with the statutory requirements in this state, which all fails to warrant belief that the business will be operated soundly and efficiently, in the public interest and consistent with the purposes of sections 36a-800 to 36a-814.

V. TEMPORARY ORDER TO CEASE AND DESIST, NOTICE OF INTENT TO REVOKE CONSUMER COLLECTION AGENCY LICENSE, NOTICE OF INTENT TO ISSUE ORDER TO CEASE AND DESIST, AND 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 constitutes sufficient grounds for the Commissioner to issue an order to revoke Respondent's license to act as a consumer collection agency in Connecticut pursuant to Section 36a-804(a) of the Connecticut General Statutes and subsections (a) and (b) of Section 36a-51 of the 2026 Supplement to the General Statutes, and forms a 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 and 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 Spire Recovery Solutions LLC d/b/a Spire d/b/a Spire Recovery Solutions immediately **CEASE AND DESIST** from any further violation of Sections 36a-801(a), 36a-812, 36a-811(b), 36a-801(f)(2), 36a-801(i), 36a-805(a)(16), 36a-805(a)(16), 36a-811(a) and 36a-17(e) of the Connecticut General Statutes, 12 CFR Part 1006.6(e) of Regulation F of the FDCPA and Sections 36a-809-9(a), 36a-809-11, 36a-809-12(2) and 36a-809-11(11) of the Regulations. This Temporary Order to Cease and Desist shall become effective upon receipt by Spire Recovery Solutions LLC d/b/a Spire d/b/a Spire Recovery Solutions, 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 Spire Recovery Solutions LLC d/b/a Spire d/b/a Spire Recovery Solutions shall:

> No later than fourteen (14) days after receipt of this Temporary Order to Cease and Desist, Spire Recovery Solutions LLC d/b/a Spire d/b/a Spire Recovery Solutions shall provide to Jeffrey Schuyler, Attorney, Consumer Credit Division, Department of Banking, 280 Trumbull Street, 16th Floor, Hartford, Connecticut 06103, or Jeffrey.Schuyler@ct.gov, the following: Evidence of Respondent's compliance with Regulation F in connection with validation notices sent via e-mail and the proof of consent to do so, evidence of Respondent's updated policy designed to comply with Regulation F, evidence that allows Respondent to e-mail the validation notice and evidence of an updated "Emailing Consumers" policy.

NOW THEREFORE, notice is hereby given to Respondent that the Commissioner intends to **REVOKE** Respondent's license to act as a consumer collection agency in Connecticut and to issue an order and to issue an order requiring Respondent to **CEASE AND DESIST** from violating Sections 36a-801(a), 36a-812, 36a-811(b), 36a-801(f)(2), 36a-801(i), 36a-805(a)(16), 36a-805(a)(16), 36a-811(a) and 36a-17(e) of the Connecticut General Statutes, 12 CFR Part 1006.6(e) of Regulation F of the FDCPA and Sections 36a-809-9(a), 36a-809-11, 36a-809-12(2) and 36a-809-11(11) of the Regulations and impose a **CIVIL PENALTY** upon Respondent as set forth herein, subject to Respondent's right to a hearing on the allegations 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, 280 Trumbull Street, 16th Floor, Hartford, Connecticut 06103 or submitted by e-mail to DOB.hearingsupport@ct.gov within fourteen (14) days following Respondent's receipt of this Temporary Order to Cease and Desist, Notice of Intent to Revoke Consumer Collection Agency License, 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 subsections (a) and (b) of Section 36a-51 of the 2026 Supplement to the General Statutes and Sections 36a-52(a) and 36a-50(a) of the Connecticut General Statutes. This Temporary Order to Cease and Desist, Notice of Intent to Revoke Consumer Collection Agency License, 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 January 5, 2027, 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 Commissioner will issue an order revoking Respondent's license to act as a consumer collection agency in Connecticut from 57 Canal Street, Suite 302, Lockport, New York and 1057 S. Sherman Street, Suite 200, Richardson, Texas, issue an order that Respondent cease and desist from violating Sections 36a-801(a), 36a-812, 36a-811(b), 36a-801(f)(2), 36a-801(i), 36a-805(a)(16), 36a-805(a)(16), 36a-811(a) and 36a-17(e) of the Connecticut General Statutes, 12 CFR Part 1006.6(e) of Regulation F of the FDCPA and Sections 36a-809-9(a), 36a-809-11, 36a-809-12(2) and 36a-809-11(11) of the Regulations, and 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 26th day of October 2026.

___/s/_____
Jorge L. Perez
Banking Commissioner

CERTIFICATION

I hereby certify that on this 26th day of October, 2026, the foregoing Temporary Order to Cease and Desist, Notice of Intent to Revoke Consumer Collection Agency License, 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 via electronic mail to Spire Recovery Solutions LLC d/b/a Spire d/b/a Spire Recovery Solutions, Attention: Meghann Helsdon, Office Manager, who is designated as the primary contact in the contact employee fields on the Nationwide Multistate Licensing System and Registry, at the electronic address provided therein, and by certified mail, return receipt requested, to Spire Recovery Solutions LLC d/b/a Spire d/b/a Spire Recovery Solutions, Attention: Meghann Helsdon, 57 Canal Street, Suite 302, Lockport, New York 14094, Certified Mail No. # 9589 0710 5270 3770 9875 23.

__/s/_____
Isaac Graham
Staff Attorney