IN THE MATTER OF:

MMG HOLDINGS LLC a/k/a HOLIDAY GROUP LLC, a/k/a MMG MARKETING GROUP, a/k/a MEMPHIS MARKETING GROUP, LLC,

JULIE A. ZANONE a/k/a JULIE A. JOHNSON

STEPHEN M. ZANONE,

ANDREW JOHNSON, and

JUSTIN A. JOHNSON

Respondents.

BEFORE THE MARYLAND
COMMISSIONER OF
FINANCIAL REGULATION

Case No.: CFR-FY2012-219

AMENDED FINAL ORDER TO CEASE AND DESIST

WHEREAS, the Office of the Commissioner of Financial Regulation, a unit in the Department of Labor, Licensing and Regulation, a principal department of the State of Maryland (the "Commissioner" or "OCFR") undertook an investigation into the business activities of MMG Holdings LLC a/k/a Holiday Group LLC a/k/a MMG Marketing Group a/k/a Memphis Marketing Group, LLC ("MMG"), Julie A. Zanone a/k/a Julie A. Johnson, Stephen M. Zanone, Andrew Johnson and Justin A. Johnson, (collectively, the "Respondents"); and

WHEREAS, as a result of that investigation, the Commissioner issued a Final Order to Cease and Desist, (the "Final Order") on December 3, 2013 after finding grounds to allege that Respondents violated various provisions of the Annotated Code of Maryland (the

"Code"), including Commercial Law Article ("CL"), Title 12, Subtitle 3 and Financial Institutions Article ("FI"), Title 11, Subtitle 2, (collectively the "Maryland Consumer Loan Law" or "MCLL"), and the Commissioner found that action under FI §§ 2-114 and 2-115 was appropriate; and

WHEREAS, the Final Order, ORDERED that the Summary Order to Cease and Desist issued by Maryland Department of Labor, Licensing and Regulation, Office of the Commissioner of Finance Regulation on June 3, 2013, is entered as a Final Order of the Commissioner, and Respondents shall permanently CEASE and DESIST from making unlicensed consumer, installment, or any other loans to Maryland consumers; and that Respondents shall permanently CEASE and DESIST from collecting or attempting to collect on any loans previously made to Maryland consumers; and that Respondents shall permanently CEASE and DESIST from referring any loan accounts involving Maryland consumers to third party collection agencies; and that Respondents shall permanently CEASE and DESIST from reporting any negative or adverse information to credit reporting agencies concerning any loan transaction which Respondents entered into with Maryland consumers; and that Respondents shall take affirmative action to prevent any third party collection agencies, to which Respondents previously referred loan accounts involving Maryland consumers, from reporting any negative or adverse information to credit reporting agencies.

ORDERED that within 30 days of the Final Order, Respondents shall take corrective actions, including notifying the effected Maryland consumers that Respondents or their agents had impermissibly and incorrectly reported to credit reporting agencies negative or adverse information concerning the loan transactions which Respondents had entered into

with the Maryland Consumers identified therein; and shall remove from the effected Maryland Consumers' credit reports all adverse or negative information which Respondents or third party collection agencies acting on Respondents' behalf had previously submitted to Credit Reporting Agencies;

ORDERED that, all loan agreements which Respondents entered into with Maryland consumers described therein, are void and unenforceable (CL §12-314(b)(1)); and it was further

ORDERED that Respondents shall pay to the Commissioner within 15 days of the date of the Final Order a total civil money penalty in the amount of \$15,000; and

WHEREAS, the Respondents have made restitution in the amounts and to those Consumers identified in the Final Order, the Commissioner has agreed to amend the Final Order to reflect a reduced civil money penalty. It is therefore, **ORDERED** that Respondents shall pay to the Commissioner a total civil money penalty in the amount of \$4,000, by cashier's or certified check made payable to the "Commissioner of Financial Regulation," within five days from the date of this Amended Final Order.

EXCEPT the amount of the civil money penalty which is amended by the Amended Order, the Amended Order does not, or is it intended to, amend, alter, negate, or novate the orders, conditions, requirements or obligations set forth in the Final Order dated December 3, 2013.

6/23/14 Date

Mark A. Kaufman

Commissioner of Financial Regulation