

IN THE MATTER OF:

MARYLAND COMMISSIONER OF
FINANCIAL REGULATION

v.

BANGLADESH CHRISTIAN
COOPERATIVE SOCIETY, LLC,

Respondent.

BEFORE THE MARYLAND

COMMISSIONER OF
FINANCIAL REGULATION

CASE NO.: CFR-FY2023-01

**SUMMARY ORDER TO CEASE AND DESIST
AND ORDER TO PRODUCE**

This Summary Order to Cease and Desist and Order to Produce (the “Order”) is issued this 29th day of August, 2022, by the Maryland Commissioner of Financial Regulation (the “Commissioner” or the “Agency”) against the Bangladesh Christian Cooperative Society, LLC, a Maryland limited liability company (the “Respondent”):

WHEREAS, the Agency is a part of the Maryland Department of Labor and undertook an investigation into the business activities of the Respondent.

WHEREAS, as a result of that investigation, the Commissioner finds grounds to allege that Respondent has conducted the business of a credit union and a consumer lender in violation of various provisions of the Annotated Code of Maryland, including but not limited to: (i) Financial Institutions Article (“FI”), §§ 6-101 *et seq.*; 11-201 *et seq.*; 11-301 *et seq.*; and (ii) Commercial Law Article (“CL”), §§ 12-101 *et seq.*; and 12-301 *et seq.* (collectively the “Maryland Consumer Lending Laws”); and the Commissioner finds that action under FI §§ 2-115(a) and 11-215(b) is appropriate.

NOW, THEREFORE, the Commissioner has determined, for the reasons set forth below, that Respondent's activities constitute the unauthorized operation of credit union in violation of Maryland law and unlicensed lending to Maryland consumers in violation of Maryland Consumer Lending Laws, and that it is in the public interest that Respondents immediately CEASE AND DESIST from continuing operation as a credit union and making loans to, or otherwise engaging in lending activities with, Maryland consumers:

1. FI §§ 2-114(a) and (b) sets forth the Commissioner's general authority to order the production of information, as well as documents and records, while investigating potential violations of laws, regulations, rules, and orders over which the Commissioner has jurisdiction (which is in addition to the Commissioner's specific investigatory authority set forth in various other Maryland statutes and regulations). Among other things, FI § 2-114(a)(2) provides that the Commissioner may "[r]equire ... a person to file a statement in writing, under oath or otherwise as the Commissioner determines, as to all the facts and circumstances concerning the matter to be investigated." Further, pursuant to FI § 2-114(b), "the Commissioner or an officer designated by the Commissioner may," among other things, "take evidence, and require the production of books, papers, correspondence, memoranda, agreements, or other documents or record members that the Commissioner considers relevant or material to the inquiry."

2. FI §§ 2-115(a) and (b) sets forth the Commissioner's authority to issue summary cease and desist orders, and to take additional actions for violations of laws, regulations, rules, and orders over which the Commissioner has jurisdiction (in addition to taking any other action permitted by law, and subject to a hearing or waiver of hearing), providing as follows:

(a) When the Commissioner determines that a person has engaged in an act or practice constituting a violation of a law, regulation, rule or order over which the Commissioner has jurisdiction, and that immediate action against the person is in the public interest, the Commissioner may in the Commissioner's

discretion issue, without a prior hearing, a summary order directing the person to cease and desist from engaging in the activity, provided that the summary cease and desist order gives the person:

- (1) Notice of the opportunity for a hearing before the Commissioner to determine whether the summary cease and desist order should be vacated; modified, or entered as final; and
- (2) Notice that the summary cease and desist order will be entered as final if the person does not request a hearing within 15 days of receipt of the summary cease and desist order.

(b) When the Commissioner determines after notice and a hearing, unless the right to notice and a hearing is waived, that a person has engaged in an act or practice constituting a violation of a law, regulation, rule, or order over which the Commissioner has jurisdiction, the Commissioner may in the Commissioner's discretion and in addition to taking any other action authorized by law:

- (1) Issue a final cease and desist order against the person;
- (2) Suspend or revoke the license of the person;
- (3) Issue a penalty order against the person imposing a civil penalty not exceeding:
 - (i) \$10,000 for a first violation; and
 - (ii) \$25,000 for each subsequent violation;
- (4) Issue an order against the person requiring the person to take affirmative action to correct the violation, including making restitution to any person aggrieved by the violation; or
- (5) Take any combination of the actions specified in this subsection.

3. FI Title 6 sets forth various provisions governing the management and activities of a credit union for the purposes of, among other things, assuring a credit union: operates in a safe and sound manner; remains properly accountable to its members; conducts its business honestly and efficiently; promotes public convenience; and otherwise complies with Maryland law.

4. FI §§ 6-202, stipulates that "credit unions are subject to the supervision of the Commissioner."

5. FI § 6-405 authorizes the Commissioner to require a credit union to obtain an Independent Audit if the Commissioner has reason to believe the Supervisory Committee of a credit union is not fulfilling its duties.

6. FI § 6-307 requires a proposed credit union to provide the Commissioner copies of its Articles of Incorporation and By-Laws for review, investigation, and approval.

7. FI § 6-309 requires incorporators of a credit union, at the time of submission of the Articles of Incorporation and By-Laws to the Commissioner under FI §6-307 to file an application with the Commissioner which includes: the proposed field of membership, mission statement, detailed business plan, and fingerprints for a criminal history background check of the incorporators and directors.

8. Pursuant to FI §6-308, a proposed credit union may not file its Articles of Incorporation with the Maryland State Department of Assessments and Taxation and become a corporation until the incorporators have complied with FI §§ 6-307 and 6-309 and the Commissioner has approved the Articles of Incorporation and By-Laws.

9. Pursuant to FI §6-313, a credit union may, among other things, receive shares and deposits of its members, loan money to its members, and invest funds as provided in FI Title 6.

10. Pursuant to FI §6-901(a)(iii), only a credit union authorized to do business in Maryland may conduct business as a credit union.

11. Pursuant to FI §§ 2-113, 2-114, 11-207, 11-214, 11-215, 11-302, 11-303 and 11-304, the Agency is responsible for licensing certain consumer lenders, investigating consumer lenders and their lending activities, instituting enforcement actions and taking other appropriate actions against a person violating Maryland's consumer lending laws.

12. Pursuant to CL 12-114.1(c) a person may not make a "covered loan" unless that person obtains a license from the Commissioner or qualifies for an exemption from licensing.

13. Pursuant to CL § 12-302, a "person may not engage in the business of making loans under this subtitle unless the person is licensed under or is exempt from the licensing requirements

of Title 11, Subtitle 2 of the Financial Institutions Article, Annotated Code of Maryland, known as the Maryland Consumer Loan Law – Licensing Provisions.”

14. Commercial Law Article Title 12, Subtitles 1 and 3 each broadly define “loan.”

15. The Agency has been made aware of the following facts leading it to conclude that the Respondent has engaged in multiple violations of Maryland law:

- a. Respondent registered as an LLC with the Maryland State Department of Assessments and Taxation on December 1, 2011, with the stated purpose of functioning as “an investment club” in its Articles of Organization.
- b. Respondent is not authorized to operate as a credit union in Maryland because, among other things, Respondent did not comply with FI §§ 6-307 and 6-309 before filing its Articles of Organization with the Maryland State Department of Assessments and Taxation nor has the Commissioner authorized Respondent to engage in the business of a credit union.¹
- c. Respondent is not authorized to operate as a credit union under the Federal Credit Union Act (12 USC §1751 et seq.).
- d. Shortly after formation, the Respondent began conducting business as a credit union, including engaging in the following acts and practices, among others further described below: (a) offering and accepting payment for share accounts from individuals that represent a capital interest in Respondent (“Share Accounts”), (b) offering and accepting savings deposits from individuals

¹ Title 6 of the Financial Institutions Article does not expressly permit the Commissioner to authorize a limited liability company to operate as a credit union.

("Savings Accounts"), (c) offering and extending loans to individuals, and (d) investing funds received from individuals.

- e. Respondent opened deposit accounts at Truist Bank, f/k/a BB&T ("Truist") and possibly other institutions for operational purposes (collectively, "Deposit Accounts"). Respondent requires every member to deposit \$20.00 a month into a single shared Deposit Account maintained at Truist which Respondent uses to make loans to members and to purchase investments ("Welfare Account").
- f. Respondent also allows its members to maintain Savings Accounts with Respondent and members may make deposits to, and withdrawals from, such Savings Accounts. The amounts deposited with Respondent into member Savings Account may be comingled in one or more Deposit Accounts at Truist.
- g. Upon information, the Respondent conformed its operating agreement to the template bylaws issued by the National Credit Union Administration, demonstrating Respondent's intent to operate in a manner functionally identical to a credit union.
- h. Upon information, the Respondent operates as a for-profit limited liability company but conducts business in a manner functionally identical to a credit union which, under Maryland law, are to operate as nonprofits.
- i. The Agency alleges that the Respondent, while conducting business as a credit union, has not complied with provisions applicable to credit unions contained in FI Title 6, and may therefore be operating in a manner that: is inconsistent with the safety and soundness standards required of credit unions; is not accountable to its members to the extent required of a credit union; is not conducting its

business honestly and efficiently as contemplated by Maryland law; and does not promote the public convenience. For example, the Agency alleges the Respondent has not insured the Savings Accounts of its members as required by FI §6-701.

- j. Complaints filed with the Agency by members of Respondent allege the Respondent has failed to hold elections for members of their Board of Directors as required under the Respondent's Operating Agreement and as required for credit unions by FI §6-317(c)(2).
- k. Complaints filed with the Agency by members of Respondent allege Respondent has resisted requests for an independent audit of Respondent's business, which the Commissioner could require of a properly authorized credit union.
- l. Complaints filed with the Agency by members of Respondent allege the Respondent's Board of Directors has failed to conduct appropriate supervisory activities imposed by FI §6-402 on credit unions by keeping appropriate documentation regarding the Share Accounts and Savings Accounts; failing to provide an audit that meets minimum requirements; and failing to provide members with regular account statements except upon demand.
- m. The Respondent's operating agreement requires Respondent's manager to provide members with an annual report no less than 30 days in advance of the annual meeting but complaints filed with the Agency by members of Respondent allege Respondent's manager has failed to do so.
- n. The Agency has determined that the Respondent has not obtained any license from the Agency authorizing Respondent to lend money to Maryland consumers.

- o. The Agency has determined that the Respondent does not qualify for any exemption from licensure in connection with consumer lending activities.
- p. Complaints filed with the Agency by members of Respondent allege Respondent began offering loans to its membership as early as 2011 and made many such loans to consumers for family and household purposes.
- q. Complaints filed with the Agency by members of Respondent further allege Respondent made loans anywhere from \$5,000-\$60,000.00.
- r. The Agency alleges that many loans Respondent made to Maryland consumers constitute either "covered loans" under CL 12-114.1 or loans subject to CL §12-301 et seq. and that the making of such loans violated the licensing provisions of either FI Title 11, subtitle 2 or subtitle 3.

16. Based on the foregoing it has been determined that, by operating as a credit union and making consumer loans, Respondent has violated the following provisions of Maryland law, among others: FI §§ 6-901(a)(iii); 11-203.1; and 11-302 and CL §§12-114.1 and 12-302. Because credit unions are authorized by Maryland law to solicit and obtain share capital and deposits from Maryland depositors, Maryland subjects credit unions to multiple statutory requirements regarding the safe, sound, and responsible operation of their business. As alleged above, Respondent has operated in a manner to avoid the applicability of those (and other) statutory protections for Maryland depositors but, all the while, using the benefits of a credit union model by soliciting and obtaining capital and deposits from Maryland depositors.

WHEREFORE, having determined that immediate action is in the public interest, and pursuant to the aforementioned provisions of the Annotated Code of Maryland, it is, by the Commissioner of Financial Regulation, HEREBY

ORDERED that Respondent shall immediately cease and desist from:

1. making loans or advances of money or credit of any nature whatsoever (hereafter, "Loans");
2. renewing any Loans;
3. modifying the terms of any Loans;
4. collecting payments on, or otherwise servicing, any Loans;
5. waiving any amounts owed under any Loans or otherwise compromising, discounting, forgiving, or discharging any amounts owed under any Loans;
6. selling, transferring, or assigning any Loans; and
7. taking possession of any collateral associated with any Loans; and it is further

ORDERED, that Respondents shall immediately cease and desist from reporting any derogatory, adverse, or otherwise unfavorable information relating in any way to any Loans to any credit reporting agency, including, without limitation, information concerning payments not made or received as a result of this Order; and it is further

ORDERED that Respondent shall immediately cease and desist from accepting Savings Account deposits or any other type of deposits; and it is further

ORDERED that Respondent shall immediately cease and desist from accepting new Share Account investments; and it is further

ORDERED that Respondent shall immediately cease and desist from making payments to the Welfare Fund; and it is further

ORDERED that Respondent shall immediately cease and desist from purchasing, selling, transferring, pledging, or otherwise conducting any transactions involving investments or other securities; and it is further

ORDERED that Respondent shall immediately cease and desist from purchasing, selling, entering into new leases, encumbering or otherwise transferring any real property, any personal property, or any interest in any real or personal property; and it is further

ORDERED that Respondent shall immediately cease and desist from making other investments of any nature whatsoever; and it is further

ORDERED that Respondent shall immediately cease and desist from providing any rent adjustments to tenants with respect to any properties owned by Respondent; and it is further

ORDERED that Respondent shall immediately cease and desist from filing or continuing any action for failure to pay rent or any other action for summary ejectment against any tenant; and it is further

ORDERED that Respondent shall immediately cease and desist from making any payments, including, but not limited to:

1. Payments to vendors and/or third parties;
2. Payments representing a withdrawal or return of funds deposited with, or invested in, Respondent by its members or any other third party;
3. Payment of salaries or other forms of employment compensation;
4. Payment of board or supervisory committee stipends, fees or any other form of compensation whether called executive honoraria or otherwise;
5. Disbursing payments from the Welfare Fund;
6. Paying dividends declared on Share Accounts;
7. Making patronage refunds; and
8. Making interest payments on Savings Accounts; and it is further

ORDERED that Respondent shall immediately cease and desist from permitting withdrawals, set-offs, debits or other disbursements from Savings Accounts or Share Accounts by members of Respondent; and it is further

ORDERED that Respondent shall immediately cease and desist from transacting, authorizing transactions, or otherwise permitting transactions on any Deposit Accounts, including, but not limited to:

1. making any withdrawals or authorizing any transactions on any Deposit Accounts, including, without limitation, any Deposit Accounts maintained at Truist Bank;
2. issuing checks or other payment instruments on any Deposit Account, including, without limitation, any Deposit Accounts maintained at Truist Bank;
3. authorizing any bank or financial institution at which Respondent maintains Deposit Accounts, including, without limitation, Truist Bank, from paying, certifying, negotiating, honoring, issuing, accepting, or executing:
 - a. any issued and outstanding check, draft or other instrument;
 - b. any pre-authorized debits or other withdrawals; and
 - c. any payment orders for which such bank or other financial institution has not yet incurred a payment obligation; and it is further

ORDERED that Respondent shall immediately cease and desist from dispensing, disbursing, or depleting any cash currently owned or held by the Respondent; and it is further

ORDERED that Respondent shall immediately cease and desist from authorizing any further transactions on any debit, credit, or ATM cards (collectively, "Cards") Respondent holds or has provided its officers, directors, agents, or employees and from authorizing the banks or financial institutions which issued such debit, credit, or ATM cards from processing any further transactions thereon; and it is further

ORDERED that Respondent immediately shall cease and desist from destroying, deleting, or altering any documents, electronic records, or other forms of records, provided however, that nothing herein shall prohibit Respondent from adding to such records to accurately reflect transactions in process as of the issuance of this Order; and it is further

ORDERED that Respondent shall immediately cease and desist from authorizing any owner, partner, member, officer, director, agent, employee, contactor, affiliated business or other third party from taking any action inconsistent with this order; and it is further

ORDERED that Respondent shall immediately cease and desist from canceling, modifying, altering, or otherwise authorizing or effecting any changes to any current or pending insurance policy or insurance coverages insuring to the benefit of Respondent; and it is further

ORDERED that Respondent shall immediately cease and desist from taking any other action not specifically listed herein that is consistent with either the operation of a credit union or engaging in consumer lending activity; and it is further

ORDERED that Respondent shall immediately CEASE AND DESIST from violating the aforementioned statutory provisions of Maryland law, and that Respondent may be assessed statutory monetary penalties and ordered to provide restitution for such violations, in addition to any other sanctions or actions against Respondents permitted by law; and it is further

ORDERED that, pursuant to the Commissioner's authority under FI §§ 2-114 and 11-214, Respondent shall provide to the Agency within 15 days of the receipt of this Summary Order to Cease and Desist and Order to Produce the following:

1. Information or documents setting forth the total number of Loans made by Respondents to Maryland consumers from January 1, 2015, to the present, broken down by calendar year.
2. Information or documents describing the following for each Loan made by Respondents to Maryland consumers from January 1, 2015, to the present:
 - a. the name of the consumer;
 - b. the consumer's phone number(s), home address, and e-mail address;
 - c. the date that the agreement with Respondents was formed;
 - d. the name of the lender if other than Respondent, and such lender's account number;

- e. the original principal amount of the Loan;
- f. all fees and other interest payments that the consumer was required to make on the Loan;
- g. the total annual interest rate on the Loan;
- h. the APR on the Loan;
- i. the date that the Loan funds were originally disbursed to the consumer;
- j. the date that initial payment was due on the Loan;
- k. the number of times that the Loan was renewed, refinanced, or extended;
- l. for each renewal, refinancing, or extension of the Loan, information or documents describing the following: each new Loan or account number, all fees and other interest payments that were required, and the dates those payments were due;
- m. the payment history for each Loan transaction, including the date and amount of each payment made by the consumer, and how that money was applied to the Loan balance (i.e. whether it was applied to interest, to principal, to late fees or other penalties, etc.);
- n. the total amount of money paid by the consumer on the Loan, including any principal, finance charges, interest, or any other fees that were paid;
- o. the purpose of the Loan;
- p. the status of the Loan, including the following for each transaction:
 - i. whether the Loan was paid in full, or if still open, whether it is current or allegedly in default,
 - ii. whether the account was referred to a third party collection agency (if so, provide the name of the collection agency);
 - iii. whether the transaction was ever the subject of any arbitration proceedings (if so, information or documents detailing the outcome of the arbitration proceeding);
 - iv. whether the transaction was ever the subject of any judicial action (if so, information or documents detailing the name of all third parties representing the Respondent in the action, the location the action was filed, the court in which it was filed, the current status of

the case, and if a final judgment has been entered, the amount of the judgment, any liens that were filed or obtained pursuant to that judgment, and the total amount of money paid by the consumer to date pursuant to the action);

- v. whether the Loan (*i.e.*, the "debt") was sold to another party (if so, information or documents detailing the name of the party to whom it was sold); and
 - vi. Loan delinquencies including aging information
3. Information or documents detailing whether Respondent or any third-party collection agency has ever submitted any negative or adverse information pertaining to any Loan to any consumer reporting agency.
 4. Information or documents setting forth the total number of Savings Accounts currently maintained at Respondent and the total aggregate balance of all such Savings Accounts.
 5. Information or documents describing the following for each Savings Account currently maintained at Respondent:
 - a. the name of the consumer;
 - b. the consumer's phone number(s), home address, and e-mail address;
 - c. the date that the Savings Account with the Respondent was established;
 - d. the amount the consumer deposited to the Savings Account; and
 - e. the current balance of the Savings Account.
 6. Information or documents setting forth the total number of Share Accounts currently maintained at Respondent and the total aggregate balance of all such Share Accounts.
 7. Information or documents describing the following for each Share Account currently maintained at Respondent by Maryland consumers:
 - a. the name of the consumer;
 - b. the consumer's phone number(s), home address, and e-mail address;
 - c. the date that the Share Account with the Respondent was established;
 - d. the amount the consumer contributed to the Share Account; and
 - e. the current value or balance of the Share Account.

8. Information or documents describing every security currently held by Respondent on behalf of any member or other consumer, including:
 - a. the name of the consumer;
 - b. the consumer's phone number(s), home address, and e-mail address;
 - c. the name and account or identifying number of each security held for each consumer;
 - d. the number of shares or units of each security held for each consumer;
 - e. the manner in which such securities are held;
 - f. the name in which the security is held;
 - g. the name, address and contact information of any broker, dealer, securities intermediary, agent, escrow agent or other person having possession or control of any such securities.
9. Information or documents describing every investment or other security currently held by Respondent in Respondent's own name or in the name of any third party other than a consumer, the asset balances for each type of asset held by the Respondent as carried on its books including copies of statements received from any bank, credit union, securities firm, escrow agent, custodian or other entity having custody of any asset of the Respondent including:
 - a. sufficient information to identify, value and locate such investment if not a security;
 - b. if a security, its name and account or other identifying number;
 - c. if a security, the number of shares or units of each security held for each consumer;
 - d. the manner in which such investments or securities are held;
 - e. the name in which each investment is held;
 - f. the name, address and contact information of any broker, dealer, securities intermediary, agent, escrow agent, or other person having possession or control of any such securities
10. Information or documents listing all assets of the Respondent not otherwise disclosed to the Agency by the Respondent pursuant to this Order, including:

- a. the asset balances for each type of asset held by the Respondent as carried on its books; and
 - b. copies of statements received from any bank, credit union, securities firm, escrow agent, custodian or other entity having custody of any asset of the Respondent.
11. Information or documents setting forth all liabilities of the Respondent not otherwise disclosed to the Agency by the Respondent pursuant to this Order, including:
- a. the balances owed by Respondent on each liability, as carried on its books;
 - b. copies of statements, accounts, or other information showing the terms of such liabilities and the amounts owed;
 - c. a listing of all accounts payable of the Respondent.
12. Information or documents concerning payments, and amounts currently owed, to any local, state, or national taxing authority.
13. Information or documents setting forth all real property currently owned by or on behalf of Respondent, including:
- a. the address of such property;
 - b. the year the Respondent acquired an interest to the property;
 - c. the consideration paid by Respondent for its interest in the property;
 - d. the current fair market value of the property;
 - e. any liens or encumbrances against the property;
 - f. the balance owed on any lien or encumbrance against the property;
 - g. copies of any leases affecting the property;
 - h. copies of the deed for the property; and
 - i. copies of any liens or encumbrances filed against the property.
14. Information or documents concerning every Deposit Account currently maintained by Respondent including:
- a. the name of the bank or financial institution at which such Deposit Account is held;
 - b. copies of month statements issued on such Deposit Account from August 1, 2019, to present;

- c. a list of all authorized signors on the Deposit Account; and
 - d. the current balance of the Deposit Account.
15. A listing of any affiliates or subsidiaries in which the Respondent directly or indirectly owns any interest.
 16. Information or documents providing following: the names of all current and former principals, owners, officers, directors, managing members, members, and partners of the Respondent; the contact information for each person identified, including their business address, mailing address (if different), phone number, and email address; all positions held with Respondent; and the dates in each position.
 17. All organizational and governing documents for the Respondent and any affiliates and subsidiaries in which the Respondent directly or indirectly owns any interest, including but not limited to the following: articles of organization; articles of incorporation; operating agreements; partnership agreements; bylaws; other governing documents; and other like documents pertaining to each company's overall structure, governance, and/or operations.
 18. Documents detailing financial asset information for Respondent for the period from January 1, 2015, through the present, including audited financial statements, unaudited financial statements, tax returns, general ledger systems reports, and like documents.
 19. If the Respondent, or if any of the principals, owners, officers, directors, managing members, members, or partners of the Respondent, has ever been named as a respondent, defendant, or party in any action by a federal, state, or local regulatory or law enforcement agency (hereinafter, "governmental agency"), information or documents which provide the following: the name of the governmental agency; the date the action was commenced; the status of the action; a copy of any complaint, charging letter, summary order, or like document; and a copy of any final order, judgment, or settlement agreement.
 20. Documents detailing any insurance policies and coverages held on the assets or other interests of the Respondent in any real, personal, tangible, or intangible property, including, without limitation, any insurance held to protect amounts deposited by consumers into the consumer's Share Account or Savings Account.

21. Documents detailing any directors and officers insurance policies and coverages held by Respondent on behalf of the managing member, officers, directors, and/or employees of the Respondent, including, without limitation, errors and omissions policies.
22. Documents detailing any insurance policies and coverages not otherwise disclosed to the Agency hereunder.

FURTHERMORE,

RESPONDENT is hereby notified that, pursuant to FI §§ 2-115(a) and 11-215(b), Respondent is entitled to a hearing before the Commissioner to determine whether this Order should be vacated, modified, or entered as a final Order of the Commissioner; and further,

RESPONDENT is hereby notified that, pursuant to FI §§ 2-115(a) and 11-215(b), this Order will be entered as a final Order of the Commissioner if Respondent does not request a hearing within 15 days of the receipt of this Order; and further,

RESPONDENT is hereby notified that, pursuant to SG §§ 9-1607.1 and 10-206.1, and in accordance with SG § 10-207(b)(4), Respondent is only permitted to request a hearing, and to appear at such hearing, through an attorney authorized to practice law in Maryland at the Respondent's own expense; and further,

RESPONDENT is hereby notified that any and all requests for a hearing in this matter must conform to the requirements stated above, must be made in the form of a signed, written request, and must be submitted to the following address:

Director of Enforcement
Office of the Commissioner of Financial Regulation
Maryland Department of Labor
1100 N. Eutaw Street, Suite 611
Baltimore, MD 21201

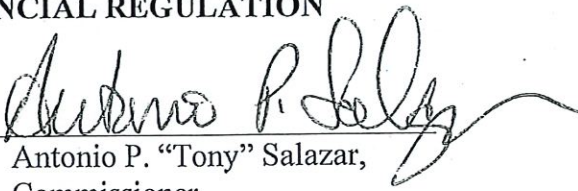
and further,

RESPONDENT is hereby notified that, pursuant to FI § 2-115(b), as a result of a hearing, or of Respondent's failure to timely request a hearing in the manner described above, the Commissioner may, in the Commissioner's discretion and in addition to taking any other action authorized by law, enter an Order making this Order final, issue a penalty order against Respondent for the violations cited above imposing a civil penalty up to \$10,000 for a first violation and up to \$25,000 for each subsequent violation, or may take any combination of the aforementioned actions against Respondents. Additionally, pursuant to CL §§2-114.1 and 12-314(b), the Commissioner may also enter a final order declaring the following: that all consumer loan agreements entered into by the Respondent with Maryland consumers are illegal and unenforceable; and that Respondent "may not receive or retain any principal, interest, or other compensation with respect to [these] loan[s] that [are] unenforceable." As such, the Commissioner may enter a final order requiring Respondent to provide restitution to Maryland consumers for any principal, interest or other amounts collected from Maryland consumers pursuant to those agreements subject to the applicable provisions of CL.

**MARYLAND COMMISSIONER OF
FINANCIAL REGULATION**

August 29, 2022

By:


Antonio P. "Tony" Salazar,
Commissioner

