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**IN THE MATTER OF:**  
  
**ALLIANCE**  
  
**(“Respondent”)**  
  
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**TEMPORARY ORDER TO  
CEASE AND DESIST**  
  
**ORDER TO MAKE RESTITUTION**  
  
**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”, 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 investigated 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 (“Investigation”).

3. As a result of the Investigation, the Commissioner has reason to believe that Respondent has violated Sections 36a-801(a) and 36a-812 of the Connecticut General Statutes, and subdivisions (2)(A), (5) and (10) of Section 36a-809-11 of the Regulations.

4. As a result of the Investigation, the Commissioner finds that the public welfare requires immediate action to issue a temporary order to cease and desist against Respondent from violating Sections 36a-801(a) and 36a-812 of the Connecticut General Statutes, and subdivisions (2)(A), (5) and (10) of Section 36a-809-11 of the Regulations.

5. As a result of the Investigation, the violations alleged by the Commissioner form the basis to issue an order to make restitution against Respondent pursuant to Sections 36a-804(b) and 36a-50(c) of the Connecticut General Statutes.

6. As a result of the Investigation, 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 Investigation, 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 allegedly a company with an office at 3014 Delaware Ave, Suite 685, Kenmore, New York, however an internet search indicates that the address is for a United States Post Office branch. Respondent has never been licensed to act as a consumer collection agency in Connecticut. A search of the Nationwide Multistate Licensing System and Registry fails to indicate a Connecticut licensed consumer collection agency with a trade name of “Alliance”.

9. On February 26, 2024, a Connecticut consumer debtor filed a complaint with the Department (“Connecticut Consumer”) stating that Respondent had left him a voicemail on February 15, 2024, attempting to collect a debt. In such voicemail, Respondent stated that it would be attempting to contact the Connecticut Consumer’s employer to deliver “paperwork” and urged him to call the phone number 855-249-7035 before all options were forfeited. When the Connecticut Consumer called the phone number on February 15, 2024, Respondent placed the Connecticut Consumer on hold and purportedly

contacted the creditor, Zoca Loans, to determine which terms would be acceptable for settlement of the debt, then demanded payment from the Connecticut Consumer within 24 hours to avoid commencement of legal action.

10. During such phone call, the Connecticut Consumer requested “verification of debt” and assurance that no legal action would be taken upon payment of the proposed settlement amount. In response, Respondent e-mailed the Connecticut Consumer a letter on its letterhead from info@alliancemedi.com later that same day. The letter provided a toll-free number 1-855-249-7035, and stated that the account was in pre-legal, the creditor was “Zoca Loans”, the current balance of the debt was \$2,191.03, the amount of the settlement offer was \$876.41, and that payment could be made by credit card or online at <https://payments.alliancemedi.com/>. There was no address for Respondent on the letter.

11. Since receiving the letter on February 15, 2024, the Connecticut Consumer received four additional voicemails from Respondent concerning the debt, including repeated threats to take legal action. To date, Respondent has not taken legal action against the Connecticut Consumer. Respondent also suggested it could take the Connecticut Consumer’s income tax refund if the Connecticut Consumer failed to pay the debt.

12. The Department subsequently contacted Rosebud Lending LZO d/b/a Zoca Loans, and by letter dated March 18, 2024, Rosebud Lending LZO d/b/a Zoca Loans represented to the Department that they had ceased collection efforts on the Connecticut Consumer’s loan and any remaining balance had been forgiven.

13. On February 29, 2024, the Department sent a certified letter, return receipt requested, to Respondent at 3014 Delaware Ave, Suite 685, Kenmore, New York, notifying Respondent of its alleged violation of Section 36a-801(a) of the Connecticut General Statutes and providing Respondent an opportunity to respond. The letter was never delivered to Respondent and on March 20, 2024, the letter was returned to the Department.

14. On April 12, 2024, the Department again sent a letter via certified mail, return receipt requested, to Respondent at 3014 Delaware Ave, Suite 685, Kenmore, New York, notifying Respondent

of its potential unlicensed consumer collection activity in Connecticut and providing Respondent an opportunity to respond. On April 25, 2024, the letter was returned to the Department marked “Return to Sender, Vacant, Unable to Forward”.

15. On April 12, 2024, the Department also sent a copy of the letter referenced in Paragraph 14 to Respondent via the electronic address provided on its website: [info@alliancemedi.com](mailto:info@alliancemedi.com). The Department received delivery confirmation of such e-mail, but to date, has not received any response.

### **III. STATUTORY BASIS FOR ORDER TO MAKE RESTITUTION, ORDER TO CEASE AND DESIST AND IMPOSITION OF CIVIL PENALTY**

16. Respondent’s acting within this state as a consumer collection agency without a consumer collection agency license, as more fully described in paragraphs 8 through 12, inclusive, constitutes at least one violation of Section 36a-801(a) of the Connecticut General Statutes. Such violation forms the basis to issue an order to make restitution pursuant to Sections 36a-804(b) and 36a-50(c) of the Connecticut General Statutes, 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 to 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.

17. Respondent’s using false, deceptive or misleading representations in connection with the collection of a debt, including falsely representing that the debt was owing and being collected on behalf of Zoca Loans and that a lawsuit would be filed against the Connecticut Consumer should the debt remain unpaid, as more fully described in paragraphs 8 through 12, inclusive, constitutes violations of subdivisions (2)(A), (5) and (10) of Section 36a-809-11 of the Regulations. Such violations 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 to 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.

18. Respondent's using false, deceptive or misleading representation or means in connection with the collection of any debt, including falsely representing that the debt was owing and being collected on behalf of Zoca Loans and that a lawsuit would be filed against the Connecticut Consumer should the debt remain unpaid, as more fully described in paragraphs 8 through 12, inclusive, constitutes falsely representing the character, amount or legal status of a debt, in violation of 12 CFR Section 1006.18(b)(2)(i) of Regulation F, threatening to take action that cannot legally be taken or that is not intended to be taken, in violation of 12 CFR Section 1006.18(c)(1) of Regulation F, and using any false representation or deceptive means to collect or attempt to collect any debt, in violation of 12 CFR Section 1006.18(d) of Regulation F, which constitute at least three violations of Section 36a-812 of the Connecticut General Statutes. Such violations 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 to 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.

#### **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) and 36a-812 of the Connecticut General Statutes and subdivisions (2)(A), (5) and (10) of Section 36a-809-11 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 consumer debtors are being prejudiced by Respondent's collecting and attempting to collect debts of Connecticut

consumer debtors while not duly licensed and using false and deceptive representations to attempt to collect the debt.

**V. TEMPORARY ORDER TO CEASE AND DESIST, ORDER TO MAKE  
RESTITUTION, NOTICE OF INTENT TO ISSUE ORDER TO CEASE  
AND DESIST, 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 forms a basis to issue an order to make restitution against Respondent pursuant to Sections 36a-804(b) and 36a-50(c) of the Connecticut General Statutes, an order to cease and desist against Respondent pursuant to Sections 36a-804(b) and 36a-52(a) of the Connecticut General Statutes, and to 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 Alliance immediately **CEASE AND DESIST** from engaging in the business of a consumer collection agency in this state without obtaining the required license in violation of Section 36a-801(a) of the Connecticut General Statutes; from using false, deceptive or misleading representations in connection with the collection of a debt, including, but not limited to, the threat to take an action that cannot legally be taken or that is not intended to be taken and the use of false representations or deceptive means to collect or attempt to collect a debt or obtain information concerning a debtor, in violation of subdivisions (2)(A), (5) and (10) of Section 36a-809-11 of the Regulations; and from failing to comply with the applicable provisions of Regulation F, in violation of Section 36a-812 of the Connecticut General Statutes. This Temporary Order to Cease and Desist shall become effective upon receipt by Alliance 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: Not later than fourteen (14) days from receipt of this Temporary Order to Cease and Desist, Alliance shall provide to Swarupa Madhavan, Paralegal, Consumer Credit Division, Department of Banking, 260 Constitution Plaza, Hartford, Connecticut 06103-1800, or swarupa.madhavan@ct.gov, an itemized list of all Connecticut consumer collection activity, including any debt it collected, attempted to collect on, or received monies for, since February 15, 2019, including: (a) the name, address and telephone number of each consumer debtor, (b) the date of placement with Alliance, the creditor name and last attempt of contact, and (c) full itemization of each consumer debtor's payments made since February 15, 2019, specifying the dates, amounts and to whom such payments were made, including any fees paid to Alliance.

**THE COMMISSIONER FURTHER ORDERS**, pursuant to Section 36a-50(c) of the Connecticut General Statutes that Alliance **MAKE RESTITUTION** of any sums obtained as a result of Alliance violating Section 36a-801(a) of the Connecticut General Statutes, plus interest at the legal rate set forth in Section 37-1 of the Connecticut General Statutes since February 15, 2019. Specifically, the Commissioner **ORDERS** that: Not later than thirty (30) days from the date this Order to Make Restitution becomes permanent, Alliance shall:

Promptly refund all payments made by Connecticut consumers that were collected by Alliance since February 15, 2019, and provide evidence of such refund to Swarupa Madhavan, Paralegal, Consumer Credit Division, Department of Banking, 260 Constitution Plaza, Hartford, Connecticut 06103-1800, or swarupa.madhavan@ct.gov

**NOW THEREFORE**, notice is hereby given to Respondent that the Commissioner intends to issue an order requiring Respondent to **CEASE AND DESIST** from violating Sections 36a-801(a) and 36a-812 of the Connecticut General Statutes and subdivisions (2)(A), (5) and (10) of Section 36a-809-11 of the Regulations and to 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, 260 Constitution Plaza, Hartford, Connecticut

06103-1800 or submitted by e-mail to [DOB.hearingsupport@ct.gov](mailto:DOB.hearingsupport@ct.gov) within fourteen (14) days following Respondent's receipt of this Temporary Order to Cease and Desist, Order to Make Restitution, 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 Sections 36-50(c), 36a-52(a) and 36a-50(a) of the Connecticut General Statutes. This Temporary Order to Cease and Desist, Order to Make Restitution, 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 November 20, 2024, 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 Order to Make Restitution shall remain in effect and become permanent, and the Commissioner will issue an order that Respondent cease and desist from violating Sections 36a-801(a) and 36a-812 of the Connecticut General Statutes and subdivisions (2)(A), (5) and (10) of Section 36a-809-11 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 23rd day of September 2024.

/s/  
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Jorge L. Perez  
Banking Commissioner

## CERTIFICATION

I hereby certify that on this 24th day of September 2024, the foregoing Temporary Order to Cease and Desist, Order to Make Restitution, 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 by certified mail, return receipt requested, to Alliance, 3014 Delaware Ave, Suite 685, Kenmore, New York 14217, Certified Mail No. 9589 0710 5270 1542 9230 90; and was sent by electronic mail to Alliance at the electronic address provided on its website.

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/s/  
Swarupa Madhavan  
Paralegal