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COMMONWEALTH OF PENNSYLVANIA
DEPARTMENT OF BANKING AND SECURITIES

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BANKING AND SECURITIES

COMMONWEALTH OF PENNSYLVANIA
DEPARTMENT OF BANKING AND
SECURITIES
BUREAU OF COMPLIANCE AND
LICENSING,
PETITIONER

v.

Docket No.: 13 0009 (ENF-C&D)

CAREY VAUGHN BROWN, an individual; and
CREDIT PAYMENT SERVICES, INC.
all its affiliated companies, including
PAYDAYMAX.COM; MYCASHNOW.COM;
DISCOUNTADVANCES.COM; IGOTIT.COM;
CREDIT PROTECTION DEPOT, INC.;
SILVER SHIELD SERVICES, INC.;
TERENINE; AREA 203; SUPPORT SEVEN;
COMMUNICATIONS PROCESSING;
SERVICES a/k/a COMPRO and ACH
FEDERAL
RESPONDENTS

NOTICE OF RIGHT TO APPEAL AND HEARING

You have the right to appeal the attached Order within 10 days of the date of the Order as provided in 1 Pa. Code § 35.20. To appeal the Order, you must file a petition, in writing, with the Banking and Securities Commission ("Commission"). If the Docket Clerk does not receive your petition within 10 days, you will waive your right to a hearing and the Order will be deemed final.

The petition must be in writing, state clearly and concisely your grounds of interest in the subject matter, the facts you rely upon, the law you rely upon, and the relief you seek as required by 1 Pa. Code §35.17.

The petition and all other documents relating to this matter must be filed with:

Linnea Freeberg, Docket Clerk
Department of Banking and Securities
17 North Second Street, Suite 1300
Harrisburg, PA 17101

Further, you must serve a copy of the petition on the person who signed the attached Order by providing a copy to their counsel set forth below:

Linda Carroll
Deputy Chief Counsel
Department of Banking and Securities
17 North Second Street, Suite 1300
Harrisburg, PA 17101

Once you file your petition, you will be notified of pertinent information such as the name of the presiding officer designated by the Commission to hear this matter and, if a hearing is scheduled, the date, time and location of the hearing. You have the right to be represented by an attorney.

All procedural matters will be governed by the Pennsylvania Administrative Agency Law, 2 Pa. C.S. §§501-508, 701-704, and the General Rules of Administrative Practice and Procedure, 1 Pa. Code §§31.1.-35.251.

common ownership, which have operated by various names and at numerous locations, including, but not necessarily limited to those named herein; and

WHEREAS, the affiliated companies have been identified to include, but are not necessarily limited to the following: Credit Payment Services, Inc., paydaymax.com, mycashnow.com, discountadvances.com, Igotit.com, Credit Protection Depot, Inc., Silver Shield Services, Inc., Terenine, Area 203, Support Seven, ACH Federal, and Communications Processing Services, Inc. *a/k/a* Compro, (hereinafter "Affiliated Companies"); and

WHEREAS, the Affiliated Companies are so closely related that they operate as alter egos of one another and of Carey Vaughn Brown such that the actions of one are, in essence, the actions of the other; and

WHEREAS, Carey Vaughn Brown, together with some Affiliated Companies, engaged in making and collecting short-term loans of less than \$25,000 through the medium of the internet to Pennsylvania consumers; and

WHEREAS, Carey Vaughn Brown and the Affiliated Companies fail to meet the interest rate requirements of the LIPL, which limits interest to 6%, or the licensing requirements of the CDCA; and

WHEREAS, Carey Vaughn Brown and the Affiliated Companies are conducting, and have conducted, their operations from various locations within the United States, including Chattanooga and Rossville, Tennessee; and Carson City, Silver Springs, and Las Vegas, Nevada; and

WHEREAS, Carey Vaughn Brown and the Affiliated Companies have post office boxes, mailing addresses or contract service providers in Grenada; Bermuda; the British West Indies;

Calgary and West Vancouver, Canada; for purposes of benefiting the Affiliated Companies in matters involving regulation and taxation; and

WHEREAS, one of the Affiliated Companies, PayDayMax.com (“PayDayMax”), operates out of 207-1425 Marine Drive, West Vancouver, British Columbia, Canada V7T 1B9; and

WHEREAS, another one of the Affiliated Companies, DiscountAdvances.com (“DiscountAdvances”) operates out of the Hallmark Building, Suite 227, Old Airport Road, The Valley, Anguilla, British West Indies; and

WHEREAS, the Department requires persons who engage in the business of making, negotiating, and collecting non-mortgage loans, or who solicit, or hold themselves out as willing or able to arrange for non-mortgage loans in Pennsylvania of less than \$25,000, and charges fees, interest, or other considerations, in excess of 6% simple interest per annum¹ for the loans be licensed as a consumer discount company; and

BACKGROUND

WHEREAS, to the best of the Department’s information and belief, Carey Vaughn Brown and the Affiliated Companies, advertise, solicit and make payday loans to Pennsylvania residents through www.paydaymax.com; www.discountadvances.com; and other websites; and

WHEREAS, Carey Vaughn Brown, PayDayMax, DiscountAdvances, and the remaining Affiliated Companies, through their websites, make payday loans to persons in amounts of up to \$2,500 (A true and correct copy of relevant pages of the websites are attached as **Appendix A**); and

¹ Simple interest is defined as “interest paid or computed on the original principal only of a loan or on the amount of an account.” See WEBSTER’S NINTH NEW COLLEGIATE DICTIONARY 1099 (9th ed. 1989). Annum is defined as “Year.” See BLACK’S LAW DICTIONARY 91 (6th ed. 1990). Thus, a person cannot engage in the business of lending in Pennsylvania amounts less than \$25,000 when the fees for the loan exceed more than 6% of the principal loan amount per year without a consumer discount company license.

WHEREAS, the websites explain that a payday loan is a short-term loan typically paid off on your next payday and that such a cash advance can range anywhere from \$100- \$2500 and is meant to function as a quick financial boost in an emergency. (*See App. A, p.3*); and

WHEREAS, the websites disclose standard rates for loans, such as a 485.45% or 573.05% Annual Percentage Rates; and

WHEREAS, the websites provide a link for applicants that wish to obtain a payday loan to “Apply Online” (*See App. A, p.5*); and

WHEREAS, applicants can apply for a payday loan on the website from their home computer; and

WHEREAS, the website at www.paydaymax.com provides that loans are not provided to residents of Arkansas, Colorado, Georgia, Montana, New Hampshire, New Jersey, Ohio, Sacramento, CA, Virginia, and West Virginia (*See App. A, p.1*); and

WHEREAS, persons that reside in Pennsylvania can apply for and receive a payday loan from PayDayMax, DiscountAdvances, or the remaining Affiliated Companies through the various websites; and

WHEREAS, the PayDayMax website states, “The transactions related to loans will be deemed to have taken place in the offices of PayDayMax.com Ltd.[®] and according to the laws of Anguilla, B.W.I., regardless of where you may be viewing or accessing this site.”; and

WHEREAS, the remaining Affiliated Companies have similar disclaimers; and

WHEREAS, the Pennsylvania Supreme Court, affirming the Commonwealth Court in *Cash Am. Net of Nev., LLC v. Dep't of Banking*, 978 A.2d 1028 (Pa. Cmwlth. 2009), determined that the Department was correct in its interpretation of the CDCA in that any person, whether physically located within the Commonwealth or located outside the Commonwealth and

operating over the internet, must comply with the licensing requirements of the CDCA to lawfully make loans of \$25,000 or less to a Pennsylvania resident, *Cash America Net of Nevada, LLC v. Dep't of Banking*, 607 Pa. 432 (2010); and

WHEREAS, neither Carey Vaughn Brown, PayDayMax, nor any of the other Affiliated Companies are licensed by the Department as a consumer discount company; and

CONSUMER COMPLAINTS

WHEREAS, on or about December 8, 2009, the Department received a written complaint from an individual, _____ regarding PayDayMax; and

WHEREAS, _____ resides at _____ Pennsylvania, _____ and

WHEREAS, in his complaint, _____ in relevant part, expressed concern that he was being charged excessive interest on a loan he obtained from PayDayMax; and

WHEREAS, _____ received a payday loan from PayDayMax on or about October 16, 2009 (*See* a true and correct copy of the Department's documentation of complaint and Loan Agreement attached as **Appendix B**); and

WHEREAS, _____ loan amount was \$700 and the annual percentage rate² charged on the loan was 485.45% resulting in a finance charge of \$130.34 (*See* App. B); and

WHEREAS, the Loan Agreement completed by _____ provided that the lender for the transaction was PayDayMax.com Inc. (*See* App. B); and

WHEREAS, _____ is a Pennsylvania resident that obtained a loan from PayDayMax in an amount less than \$25,000 in which the fees on the loan exceeded 6% simple interest per annum; and

² Annual percentage rate expresses on an annualized basis the charges imposed on the borrower to obtain a loan including interest, discount and other costs. *See* 15 U.S.C.S. §1606; *see also* MORTGAGE BANKERS ASSOCIATION OF AMERICA, 9th ed. Mortgage Banking Terms, A Working Glossary, p.10 (2002).

WHEREAS, on or about August 13, 2010, the Department received a written complaint from an individual, _____ regarding PayDayMax; and

WHEREAS, _____ resides at _____ PA _____ and

WHEREAS, in his complaint, _____ in relevant part, expressed concern that he was being charged excessive interest on a loan he obtained from PayDayMax; and

WHEREAS, _____ received a payday loan from PayDayMax on or about June 4, 2010 (*See* a true and correct copy of the Department's documentation of complaint and Loan Agreement attached as **Appendix C**); and

WHEREAS, _____ loan amount was \$400 and the annual percentage rate³ charged on the loan was 485.45% resulting in a finance charge of \$148.96 (*See* App. C); and

WHEREAS, the Loan Agreement completed by _____ provided that the lender for the transaction was PayDayMax. (*See* App. C); and

WHEREAS, _____ is a Pennsylvania resident that obtained a loan from PayDayMax in an amount less than \$25,000 in which the fees on the loan exceeded 6% simple interest per annum; and

WHEREAS, on or about April 2, 2012, the Department received a complaint from an individual, _____, regarding DiscountAdvances (*See* a true and correct copy of the Department's documentation of Ms. Young's complaint attached as **Appendix D**); and

WHEREAS, _____ resides at _____ Pennsylvania

(*See* App. D) and

³ Annual percentage rate expresses on an annualized basis the charges imposed on the borrower to obtain a loan including interest, discount and other costs. *See* 15 U.S.C.S. §1606; *see also* MORTGAGE BANKERS ASSOCIATION OF AMERICA, 9th ed. Mortgage Banking Terms, A Working Glossary, p.10 (2002).

WHEREAS, _____ states that she obtained a loan two years ago from DiscountAdvances and was unable to re-pay the loan after which time the loan was sent to a collection agency that began to harass _____ (See App. D) and

WHEREAS, _____ alleges that the loan balance of \$870 dollars has grown to \$2,350; (See App. D) and

WHEREAS, _____ is a Pennsylvania resident that obtained a loan from DiscountAdvances in an amount less than \$25,000 in which the fees on the loan exceeded 6% simple interest per annum; and

WHEREAS, on or about August 3, 2012, the Department received a complaint from the Office of Consumer Protection within the Attorney General's office from _____ regarding DiscountAdvances (See a true and correct copy of the Department's documentation of complaint and Loan Renewal Agreement attached as **Appendix E**); and

WHEREAS, _____ resides at _____ Pennsylvania and

WHEREAS, in his complaint, _____ explained that while he was overseas in 2011, his wife borrowed money from DiscountAdvances; and

WHEREAS, _____ further complained that the loan was wrongfully put into his name without his knowledge or consent; and

WHEREAS, _____ further complained that the loan continues to be renewed in his name without regard to the fact that he advised the company that he did not take out the loan; and

WHEREAS, _____ alleges that DiscountAdvances is engaging in credit collection practices; and

WHEREAS, on May 7, 2012 a loan renewal occurred without his knowledge or consent in the amount of \$1470.00 at an interest rate of 400.444% (*See App. E*); and

WHEREAS, is a Pennsylvania resident that is being held responsible for a loan he did not take from DiscountAdvances in an amount less than \$25,000 in which the fees on the loan exceeded 6% simple interest per annum; and

WHEREAS, on or about October 1, 2012, the Department received a written complaint from an individual, regarding PayDayMax; and

WHEREAS, resides at Pennsylvania and

WHEREAS, in her complaint, in relevant part, expressed concern that she was being charged excessive interest on a loan she obtained from PayDayMax; and

WHEREAS, received two payday loans from PayDayMax on or about April 16, 2012 (payday loan 1) and on or about July 17, 2012 (payday loan 2); and (*See a true and correct copy of Loan Status Statements attached as App. F*); and

WHEREAS, the payday loan 1 amount was \$530.00 and the annual percentage rate charged on the loan was 485.45% resulting in a finance charge of \$1,001.05 (*See App. F*); and

WHEREAS, the payday loan 2 amount was \$680.00 and the annual percentage rate charged on the loan was 485.45% resulting in a finance charge of \$897.06 (*See App. F*); and

WHEREAS, the Loan Agreement completed by provided that the lender for the transaction was PayDayMax; and

WHEREAS, is a Pennsylvania resident that obtained a loan from PayDayMax in an amount less than \$25,000 in which the fees on the loan exceeded 6% simple interest per annum; and

WHEREAS, because Carey Vaughn Brown and the Affiliated companies do business over the Internet, through their websites, the Department has reason to believe that they have provided payday loans in amounts of less than \$25,000 and charged fees, interest charges and other considerations in excess of 6% on the principal loan amount per year to Pennsylvania residents not referenced in this Order; and

VIOLATIONS

WHEREAS, by soliciting and holding themselves out as willing or able to arrange for or negotiate loans of \$25,000 or less to Pennsylvania residents where the interest, fees, charges, or other considerations in the aggregate exceed 6% on the principal loan amount per year, without being licensed by the Department, Carey Vaughn Brown and the Affiliated companies violated Section 3.B of the CDCA, 7 P.S. § 6203.B, and Section 201(a) of the LIPL, 41 P.S. § 201(a); and

WHEREAS, by engaging in the business of negotiating and making loans of less than \$25,000 to Pennsylvania residents and by charging fees, interest, charges or other considerations in excess of 6% on the principal loan amount per year, without being licensed by the Department, Carey Vaughn Brown and the Affiliated Companies violated and continue to violate Section 3.A of the CDCA, 7 P.S. § 6203.A, and Section 201(a) of the LIPL, 41 P.S. § 201(a); and

WHEREAS, by engaging in the business of collecting on loans made to Pennsylvania residents that were less than \$25,000 and in which the fees, interest charges or other considerations exceeded 6% on the principal loan amount per year, without being licensed by the Department, Carey Vaughn Brown and the Affiliated Companies violated Section 3.A of the CDCA, 7 P.S. § 6203.A, and Section 201(a) of the LIPL, 41 P.S. § 201(a); and

DEPARTMENT'S AUTHORITY

WHEREAS, because Carey Vaughn Brown, Credit Payment Services, Inc., paydaymax.com, mycashnow.com, discountadvances.com, Igotit.com, Credit Protection Depot, Inc., Silver Shield Services, Inc., Terenine, Area 203, Support Seven, ACH Federal, and Communications Processing Services, Inc. *a/k/a* Compro, engage in unlicensed activity in violation of the CDCA and LIPL by soliciting and offering loans, the Department has the authority to, *inter alia*, order Carey Vaughn Brown and the Affiliated Companies, jointly and severally, to cease and desist the activity until licensed, make restitution for actual damages to Pennsylvania consumers, require Carey Vaughn Brown and the Affiliated Companies to pay the costs of the Department's enforcement action, prohibit or permanently remove Carey Vaughn Brown and the Affiliated Companies from continuing the activity, and to impose such other conditions as the Department deems appropriate, 41 P.S. §§ 506(c)(2)-(5); and

WHEREAS, because PayDayMax and DiscountAdvances engaged in unlicensed activity in violation of the CDCA and LIPL, the Department has the authority to levy a fine against PayDayMax in the amount of \$10,000 per offense, 41 P.S. § 505(b); and

WHEREAS, the Department may consider mitigating factors such as cooperation and acts of good faith when determining the sanctions to impose; and

WHEREAS, this Order shall not preclude the Department from commencing additional enforcement action against Carey Vaughn Brown, PayDayMax, DiscountAdvances, or any of the Affiliated Companies, or persons associated with any of the Affiliated Companies, as it deems necessary based on information unknown as of this date;

AND NOW THEREFORE, because Carey Vaughn Brown and the Affiliated Companies engaged in the business of lending money in an amount less than \$25,000 to

Pennsylvania residents and charging in excess of 6% simple interest per annum for the loan, without a license, and/or advertised and solicited such loans to Pennsylvania residents through their websites, and attempted to collect on such loans, the Bureau, under the authority cited above, hereby imposes the following order ("Order"). Upon the effective date of this Order:

1. Carey Vaughn Brown, Credit Payment Services, Inc., paydaymax.com, mycashnow.com, discountadvances.com, Igotit.com, Credit Protection Depot, Inc., Silver Shield Services, Inc., Terenine, Area 203, Support Seven, ACH Federal, and Communications Processing Services, Inc. *a/k/a* Compro, jointly and severally, shall immediately cease and desist from negotiating and making non-mortgage loans or advances of money on credit in an amount of \$25,000 or less to Pennsylvania residents and charging interest and fees in excess of 6% on the principal amount loaned per year until licensed by the Department to do such business.

2. Carey Vaughn Brown, Credit Payment Services, Inc., paydaymax.com, mycashnow.com, discountadvances.com, Igotit.com, Credit Protection Depot, Inc., Silver Shield Services, Inc., Terenine, Area 203, Support Seven, ACH Federal, and Communications Processing Services, Inc. *a/k/a* Compro, jointly and severally, shall immediately cease and desist from advertising, soliciting, and arranging non-mortgage loans for Pennsylvania residents in an amount less than \$25,000 and charging interest, fees and other considerations in excess of 6% on the principal loan amount per year until licensed by the Department to do such business.

3. Carey Vaughn Brown, Credit Payment Services, Inc., paydaymax.com, mycashnow.com, discountadvances.com, Igotit.com, Credit Protection Depot, Inc., Silver Shield Services, Inc., Terenine, Area 203, Support Seven, ACH Federal, and Communications Processing Services, Inc. *a/k/a* Compro, jointly and severally, shall immediately cease and desist from attempting to collect or collecting, directly or indirectly through third parties such as

collection agencies, interest or any other considerations that exceed 6% simple interest per annum on non-mortgage loans of less than \$25,000 that it made to Pennsylvania residents since February 1, 2009.

4. Carey Vaughn Brown, Credit Payment Services, Inc., paydaymax.com, mycashnow.com, discountadvances.com, Igotit.com, Credit Protection Depot, Inc., Silver Shield Services, Inc., Terenine, Area 203, Support Seven, ACH Federal, and Communications Processing Services, Inc. *a/k/a* Compro, jointly and severally, shall not transfer, assign or sell to any persons, companies or entities any non-mortgage loans of less than \$25,000 that it has made to Pennsylvania residents since February 1, 2009 where the interest, fees or other considerations on the loans exceed 6% simple interest per annum.

5. Carey Vaughn Brown, Credit Payment Services, Inc., paydaymax.com, mycashnow.com, discountadvances.com, Igotit.com, Credit Protection Depot, Inc., Silver Shield Services, Inc., Terenine, Area 203, Support Seven, ACH Federal, and Communications Processing Services, Inc. *a/k/a* Compro, jointly and severally, shall not purchase any non-mortgage loans of less than \$25,000 that it has made to Pennsylvania residents since February 1, 2009 where the interest, fees or other considerations on the loans exceed 6% simple interest per annum.

6. Carey Vaughn Brown, Credit Payment Services, Inc., paydaymax.com, mycashnow.com, discountadvances.com, Igotit.com, Credit Protection Depot, Inc., Silver Shield Services, Inc., Terenine, Area 203, Support Seven, ACH Federal, and Communications Processing Services, Inc. *a/k/a* Compro, jointly and severally, shall not directly or indirectly (through third parties or collection agencies) file a negative report with any credit agency regarding any Pennsylvania resident to which it has provided a non-mortgage loan of less than

\$25,000 since February 1, 2009 if the consumer has paid back the principal amount of the loan plus interest of up to (not in excess of) 6% simple interest per annum.

7. Carey Vaughn Brown, Credit Payment Services, Inc., paydaymax.com, mycashnow.com, discountadvances.com, Igotit.com, Credit Protection Depot, Inc., Silver Shield Services, Inc., Terenine, Area 203, Support Seven, ACH Federal, and Communications Processing Services, Inc. *a/k/a* Compro, jointly and severally, shall correct any such negative reports previously filed with any credit agency regarding any Pennsylvania resident to which it has provided a non-mortgage loan of less than \$25,000 since February 1, 2009 if the consumer has paid back an amount equal to the principal amount of the loan plus interest of up to (not in excess of) 6%.

8. Carey Vaughn Brown, Credit Payment Services, Inc., paydaymax.com, mycashnow.com, discountadvances.com, Igotit.com, Credit Protection Depot, Inc., Silver Shield Services, Inc., Terenine, Area 203, Support Seven, ACH Federal, and Communications Processing Services, Inc. *a/k/a* Compro, jointly and severally, shall refund to Pennsylvania residents (that have accepted a non-mortgage loan from PayDayMax of less than \$25,000 since February 1, 2009) the amount of monies that the residents paid on loans that exceeded 6% simple interest per annum.

9. Within 10 days of the effective date of this Order, Carey Vaughn Brown, Credit Payment Services, Inc., paydaymax.com, mycashnow.com, discountadvances.com, Igotit.com, Credit Protection Depot, Inc., Silver Shield Services, Inc., Terenine, Area 203, Support Seven, ACH Federal, and Communications Processing Services, Inc. *a/k/a* Compro, jointly and severally, shall provide to the Department a list of loans and cash advances made to Pennsylvania residents from February 1, 2009 to the present. The listing shall include:

- a. The name, address and phone number of each consumer; and
- b. The date of the loan; and
- c. The terms of the loan including the amount financed, any and all charges, interest, fees or other considerations including, but not limited to interest charges, finance charges, renewal fees, and the total amount of payments to be paid by the resident; and
- d. The status of the loans including total amounts still owed by the resident to Carey Vaughn Brown, Credit Payment Services, Inc., paydaymax.com, mycashnow.com, discountadvances.com, Igotit.com, Credit Protection Depot, Inc., Silver Shield Services, Inc., Terenine, Area 203, Support Seven, ACH Federal, or Communications Processing Services, Inc. *a/k/a* Compro, or if the loans have been transferred to a third party such as another lender or collection agency, when such transfer occurred and the contact information for the third party; and
- e. Any other additional information that the Department shall request relating to these loans as the Department deems necessary.

10. PayDayMax shall pay a fine to the Department in an amount of \$40,000 for the violations of the CDCA and LIPL referenced in this Order. See 41 P.S. § 505(b). The Department reserves the right to impose additional fines based on each specific short-term loan transaction unknown as of the date of this Order, but uncovered at a later date, in the absence of good faith on the part of PayDayMax.

11. DiscountAdvances shall pay a fine to the Department in an amount of \$20,000 for the violations of the CDCA and LIPL referenced in this Order. See 41 P.S. §505(b). The

Department reserves the right to impose additional fines based on each specific short-term loan transaction unknown as of the date of this Order, but uncovered at a later date, in the absence of good faith on the part of DiscountAdvances.

12. Carey Vaughn Brown, Credit Payment Services, Inc., paydaymax.com, mycashnow.com, discountadvances.com, Igotit.com, Credit Protection Depot, Inc., Silver Shield Services, Inc., Terenine, Area 203, Support Seven, ACH Federal, and Communications Processing Services, Inc. a/k/a Compro, jointly and severally, shall pay the reasonable costs and expenses incurred by the Department to commence and prosecute this enforcement action should they challenge this Order without success. To this end, the Department expressly requests a separate hearing to ascertain the amount of monies expended by the Department.

IT IS SO ORDERED.

Ryan Walsh, Chief
Department of Banking and Securities
Bureau of Compliance and Licensing

January 14, 2013

(Date)

COMMONWEALTH OF PENNSYLVANIA
DEPARTMENT OF BANKING AND SECURITIES

FILED

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DEPARTMENT OF BANKING AND	:			
SECURITIES	:			
BUREAU OF COMPLIANCE AND	:			
LICENSING,	:			
PETITIONER	:			
	:			
v.	:			
	:			
CAREY VAUGHN BROWN, an individual; and	:			
CREDIT PAYMENT SERVICES, INC.	:			
all its affiliated companies, including	:			
PAYDAYMAX.COM; MYCASHNOW.COM;	:			
DISCOUNTADVANCES.COM; IGOTIT.COM;	:			
CREDIT PROTECTION DEPOT, INC.;	:			
SILVER SHIELD SERVICES, INC.;	:			
TERENINE; AREA 203; SUPPORT SEVEN;	:			
COMMUNICATIONS PROCESSING;	:			
SERVICES a/k/a COMPRO and ACH	:			
FEDERAL	:			
RESPONDENTS	:			

CERTIFICATE OF SERVICE

I hereby certify that I have this day served a copy of the foregoing Cease and Desist Order upon the parties below, who constitute the only parties of record in this proceeding, in accordance with the requirements of 1 Pa. Code §§ 33.35 and 33.36:

BY REGISTERED MAIL, CERTIFIED MAIL
RETURN RECEIPT REQUESTED AND FIRST CLASS MAIL:

Carey Vaughn Brown and PayDayMax.com
c/o PayDayMax Ltd.
207-1425 Marine Drive
West Vancouver
British Columbia
Canada V7T 1B9

Joanne Temple, Esq.
Scenic City Legal Group, PC
3806 Amnicola Highway
Chattanooga, TN 37406

Carey Vaughn Brown and DiscountAdvances.com
The Hallmark Bldg. Suite 227
Old Airport Road
The Valley, Anguilla, BWI

Dated: January 14, 2013

Linda Carroll, Deputy Chief Counsel
Pennsylvania Department of Banking
and Securities
Bureau of Compliance and Licensing
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Harrisburg, PA 17101
(717) 787-1471