

FILED

COMMONWEALTH OF PENNSYLVANIA
DEPARTMENT OF BANKING AND SECURITIES 2015 JUN 24 PM 2: 23

PA DEPARTMENT OF
BANKING AND SECURITIES

COMMONWEALTH OF PENNSYLVANIA :
DEPARTMENT OF BANKING AND :
SECURITIES, COMPLIANCE OFFICE, :

PETITIONER :

v. :

AUTOLOANS, LLC, :
CAR LOANS, LLC :
LOAN SERVICING SOLUTIONS :
MANAGEMENT SOLUTIONS, LLC :
WILLIAM MCKIBBIN III, INDIVIDUAL :
KEVIN CRONIN, INDIVIDUAL :
MARK EDWARD WIENER, INDIVIDUAL :
KELLY S. BONNER, INDIVIDUAL :
and other companies and :
corporations under their control, :
jointly and severally, :

Docket No. 15 6017 (BNK C&D)

RESPONDENTS :

NOTICE TO ANSWER AND PETITION FOR HEARING

You, Autoloans, LLC, Car Loans, LLC, Loan Servicing Solutions, Management Solutions, LLC, William McKibbin III, Kevin Cronin, Mark Edward Wiener, and Kelly S. Bonner must immediately cease and desist from making loans in Pennsylvania, from repossessing motor vehicles and from collecting interest over 6% as set forth in the attached *Order to Cease and Desist, Prohibit, Pay a Fine and Provide Restitution* ("Order"). However, you have the right to challenge the continuing nature of the Order and all of its remedies by filing an answer and petition for hearing, in writing, with the Docket Clerk **within 30 days** of the date of this Order in accordance with 1 Pa. Code § 35.20 and 1 Pa. Code § 35.37. **If you do not file an Answer and Petition for Hearing within 30 days, then you will waive your right to a hearing and this Order will be final and not subject to appeal.**

Your Answer and Petition for Hearing must be in writing. You must specifically admit or deny the allegations in the Order, set forth the facts you rely upon and state concisely the law you rely upon and the relief you seek as required by 1 Pa. Code §35.17. General denials of the allegations set forth in the Order are not sufficient; you must support your denials with specific facts. Failure to support your denials with specific facts may cause the Banking and Securities

Commission to deem the facts in the Order as admitted and to enter a final order against you, without a hearing.

Your Answer and Petition for Hearing and all other documents relating to this matter must be filed with the Docket Clerk:

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

Further, you must serve a copy of the Answer and Petition for Hearing and any other documents on the person who signed the Order by providing a copy to his or her counsel indicated below:

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

If you file your Answer and Petition for Hearing, you will be notified of pertinent information such as the name of the presiding officer designated by the Banking and Securities 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.

FILED

COMMONWEALTH OF PENNSYLVANIA
DEPARTMENT OF BANKING AND SECURITIES

2015 JUN 24 PM 2:24

PA DEPARTMENT OF
BANKING AND SECURITIES

COMMONWEALTH OF PENNSYLVANIA :
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and other companies and :
corporations under their control, :
jointly and severally, :

Docket No. 15 0017 (BNK C&D)

RESPONDENTS :

ORDER TO CEASE AND DESIST, PROHIBIT,
PAY A FINE, AND PROVIDE RESTITUTION

THIS 24th DAY OF JUNE, 2015, Autoloans, LLC, Car Loans, LLC, Loan Servicing Solutions, Management Solutions, LLC and William McKibbin III, Kevin Cronin, Mark Edward Wiener, and Kelly S. Bonner, individuals (collectively "Respondents") **ARE HEREBY ORDERED TO IMMEDIATELY CEASE AND DESIST** from engaging with Pennsylvania consumers, either as principal, employee, agent or broker, in the business of negotiating, or making secured or unsecured loans, or advances of money on credit, or soliciting, advertising, or arranging for such loans, or purchasing and taking assignment of those loans, in amounts less than \$25,000 and at rates of interest in excess of 6% in violation of the Act of 1937, P.L. 262, No. 66, as

amended, known as the Consumer Discount Company Act (hereinafter "CDCA"), (7 P.S. § 6201-6221), the Act of 1974 P.L. 13, No. 6, as amended, known as the Loan Interest Protection Law (hereinafter "LIPL"), (41 P.S. § 101-605) and the Act of 1937, P.L. 200 No. 51, as amended, known as the Pawnbrokers License Act, (hereinafter "PLA").

Respondents **ARE FURTHER ORDERED TO IMMEDIATELY CEASE AND DESIST** from charging, collecting, or receiving interest and fees in excess of 6% per annum in violation of the LIPL, and to suffer fines, penalties, prohibition and restitution as further set forth herein.

FACTS

In support of its Order, the Bureau of Compliance and Licensing states the following:

Parties

1. The Department of Banking and Securities ("Department") is the Commonwealth of Pennsylvania's administrative agency authorized and empowered to administer and enforce the CDCA, LIPL and the PLA.
2. The Compliance Office has the responsibility to administer and enforce the CDCA, LIPL, and PLA on behalf of the Department.
3. The Compliance Office operates from its offices at 17 North Second Street, Suite 1300, Harrisburg, Pennsylvania 17101.
4. Respondents are companies and individuals that operate from numerous addresses, among which the following have been identified to date: 6170 W. Lake Mead Blvd, Las Vegas, Nevada 89108-2661 and with virtual offices located at 433 Plaza Real Suite 275, Boca Raton, Florida 33432 and P.O. Box 11, Rarotonga, Cook Islands.

5. William McKibbin, residence address of 7705 Solimar Circle, Boca Raton, Florida 33433, is an owner, officer or control person for Autoloans, LLC.

6. Kevin Cronin, residence address of 3645 Dorrit Avenue, Boynton Beach, Florida 33436, is an owner, officer or control person for Autoloans, LLC.

7. Mark Edward Weiner, residence address of 5405 Sunrise Blvd., Delray Beach, Florida 33484-1119, is an owner, officer or control person for Autoloans, LLC.

8. Kelly S. Bonner, who has a residence address of 2050 Polo Gardens Drive, Apt. #208, Wellington, Florida 33414-2003, is an employee of, or control person for, Autoloans, LLC.

9. Respondents are not registered with the Department of State, Bureau of Corporations, to engage in business in the Commonwealth of Pennsylvania, and the Compliance Office has been unable to identify a state where the Respondents are incorporated, or registered as corporate entities.

10. Respondents are not and have never been licensed by the Department as a consumer discount company or as a pawnbroker.

Authority of the Department

11. The Department, in accordance with the CDCA, requires persons that engage, either as principal, employee, agent or broker, in the business of negotiating or making loans in amounts of \$25,000 or less and charge, collect, contract for or receive interest which aggregate in excess of 6% per annum, to maintain a consumer discount company license. 7 P.S. § 6203.A; 41 P.S. § 201.

12. The Department, in accordance with the CDCA, deems any person that "shall hold himself out as willing or able to arrange for or negotiate" loans in amounts of \$25,000 or less where the interest to be charged on the loans exceed 6% interest per annum or "who solicits

prospective borrowers” of such loans to be engaged in the business of consumer lending; persons such engaged are required by law to maintain a consumer discount company license. 7 P.S. § 6203.B; 41 P.S. § 201.

13. The LIPL establishes the maximum lawful rate of interest for a secured loan or use of money in an amount of \$50,000 or less in all cases where no express contract shall have been made for a less rate shall be six per cent per annum. 41 P.S. §§ 201(a), 201(b)(2).

14. The Department may levy a fine against any person violating the LIPL up to \$10,000 for each offense. *See* 41 P.S. §§ 505(b), 506(c)(5).

15. The Department may order any person in violation of the LIPL to cease and desist from any further violation and order that person to make restitution or actual damages to any aggrieved person. 41 P.S. §506(c)(3)

16. The Department may prohibit or permanently remove an individual responsible for a violation of the LIPL from working in his or her present capacity or in any other capacity related to activities regulated by the department. 41 P.S. §506(c)(2).

17. The Department may require any person that violated the LIPL to pay costs associated with any department enforcement action initiated under the provisions of the LIPL. 41 P.S. § 506(c)(4).

18. The PLA provides that any pawnbroker who charges, contracts for or receives interest or charges greater than permitted under this act shall forfeit both principal and interest and shall return the pledge upon demand of the pledger and shall surrender the pawn ticket without tender or payment of principal or interest. 63 P.S. § 281-12(E).

19. The Department, in accordance with the PLA, requires any person that 1) engages in the business of lending money on the deposit or pledge of personal property, other than choses

in action, securities, or written evidences of indebtedness; or 2) purchases personal property with an expressed or implied agreement or understanding to sell it back at a subsequent time at a stipulated price; or 3) lends money upon goods, wares or merchandise pledged, stored or deposited as collateral security to have a pawnbroker's license. 63 P.S. §§ 281-2, 281-3.

20. No person may engage or continue to engage in business as a pawnbroker in this Commonwealth except as authorized by the Pawnbrokers License Act and without first obtaining a license from the Secretary of Banking and Securities. 63 P.S. § 281-3.

Respondent's Unlicensed and Usurious Activities

21. Beginning in and around 2013, Respondents engaged in the business of making loans to Pennsylvania residents, secured by motor vehicles titled and registered in the Commonwealth of Pennsylvania.

22. Interest rates on the loans exceed 200%, far exceeding the legal rate of interest of 6% allowed by the LIPL for persons not otherwise authorized by law, by license or charter, to charge.

23. Respondents have also purchased similar usurious loans, made in the name of other companies, in which they played a significant management role and possibly an ownership role.

24. Respondents utilized several subterfuges to enable their usurious activity including, but not limited to: holding back contract terms and conditions from consumers until after the loan is made; the use of a Cook Island, New Zealand post office address; the use of New Zealand Arbitration as the sole remedy for complaints; utilizing a virtual office in Boca Raton, Florida where the management asked the virtual office personnel not to accept certified mail; and, changing e-mail addresses for employees to exclude any relation to the business name.

25. To date, the Compliance Office has identified 163 Pennsylvania residents that have entered into loan agreements with Respondents as evidenced by 163 liens against motor vehicle titles on record at the Pennsylvania Department of Transportation in favor of the Respondents.

26. Additional loans have been identified by lawsuits filed against one or more Respondents in the civil courts by Pennsylvania residents, or by complaints filed with a government agency.

27. Respondents hold themselves out as pawnbrokers inasmuch as the agreement with the consumer is called a "Pawn Ticket and Agreement."

28. Further, the agreement provides that title to the vehicle will remain in possession of the Respondent. The vehicle itself remains in the use and possession of the borrower, but that use and possession is limited by the installation of a Global Positioning System ("GPS") device in the "pawned" vehicle. The GPS device is intended to allow Respondent to easily repossess the vehicle in the event of default on the loan, and to enforce other terms of the agreement such as the restricted out of state use of the vehicle and maintenance of the GPS device.

29. Respondents have either repossessed, or are presently attempting to repossess, vehicles in Pennsylvania when payments on the usurious loans have defaulted.

VIOLATIONS

30. Autoloans, LLC, Car Loans, LLC, Loan Servicing Solutions, Management Solution, LLC, William McKibbin III, Kevin Cronin, Mark Edward Wiener, and Kelly S. Bonner, jointly and severally, violated the CDCA by engaging in Pennsylvania, as principal, employee, agent or broker, in the business of negotiating or making loans or advances of money on credit, or soliciting, advertising, or arranging for such loans, or purchasing and taking assignment of those

loans, in amounts less than \$25,000 without a license as required by the CDCA. 7 P.S. §§ 6203; 6211.

31. Autoloans, LLC, Car Loans, LLC, Loan Servicing Solutions, Management Solution, LLC, William McKibbin III, Kevin Cronin, Mark Edward Wiener, and Kelly S. Bonner, jointly and severally, violated the CDCA and the LIPL by charging, collecting or contracting for interest and fees in excess of 6% per annum without a license under the CDCA, or otherwise authorized by any other provision of law. 7 P.S. §§ 6203; 6211; 41 P.S. § 202.

32. Alternatively, Autoloans, LLC, Car Loans, LLC, Loan Servicing Solutions, Management Solution, LLC, William McKibbin III, Kevin Cronin, Mark Edward Wiener, and Kelly S. Bonner, jointly and severally, violated the PLA by charging, contracting for and receiving interest in excess of six per cent per year on loans and other excessive charges. 63 P.S. § 281-12.

33. Autoloans, LLC, Car Loans, LLC, Loan Servicing Solutions, Management Solution, LLC, William McKibbin III, Kevin Cronin, Mark Edward Wiener, and Kelly S. Bonner, jointly and severally, alternatively violated the PLA by providing for a loan repayable in installments. 63 P.S. § 281-19.

34. Autoloans, LLC, Car Loans, LLC, Loan Servicing Solutions, Management Solution, LLC, William McKibbin III, Kevin Cronin, Mark Edward Wiener, and Kelly S. Bonner, jointly and severally, alternatively violated the PLA by selling pledged vehicles without a thirty-day notice to the borrower. 63 P.S. § 281-24.

35. Autoloans, LLC, Car Loans, LLC, Loan Servicing Solutions, Management Solution, LLC, William McKibbin III, Kevin Cronin, Mark Edward Wiener, and Kelly S. Bonner, jointly and severally, demonstrated a lack of financial responsibility, experience, character and general fitness of the person such that they do not command the confidence of the community that

any business owned or directed by them will be operated honestly, fairly, and within the intent and purpose of the CDCA and LIPL, and in accordance with the general laws of this Commonwealth. 7 P.S. § 6212; 41 P.S. § 506(c)(2); 63 P.S. § 281-8.

WHEREFORE, pursuant to its authority under the Department of Banking and Securities Code, the CDCA, the LIPL, and the PLA, the Department hereby requires the following sanctions:

1. Autoloans, LLC, Car Loans, LLC, Loan Servicing Solutions, Management Solution, LLC, William McKibbin III, Kevin Cronin, Mark Edward Wiener, and Kelly S. Bonner, jointly and severally, **shall immediately cease and desist, without regard to whether a Petition for Hearing is filed**, from engaging, as principal, employee, agent or broker, in the business of negotiating or making loans or advances of money on credit, or soliciting, advertising, over radio, television, print, through the internet and or mails, or by any other means whatsoever, or arranging for such loans, or purchasing and taking assignment of those loans, in amounts less than \$50,000, directly, or in association with any third party, to any Pennsylvania resident. *See* 41 P.S. § 506(c)(3); 71 P.S. § 202.D.

2. Autoloans, LLC, Car Loans, LLC, Loan Servicing Solutions, Management Solution, LLC, William McKibbin III, Kevin Cronin, Mark Edward Wiener, and Kelly S. Bonner, jointly and severally, **shall immediately cease and desist, without regard to whether a Petition for Hearing is filed**, from making loans on the deposit or pledge of personal property, particularly motor vehicles, as collateral security to any Pennsylvania resident using any vehicle titled and registered in Pennsylvania. 63 P.S. § 281-8.

3. Autoloans, LLC, Car Loans, LLC, Loan Servicing Solutions, Management Solution, LLC, William McKibbin III, Kevin Cronin, Mark Edward Wiener, and Kelly S. Bonner, jointly and severally, **shall immediately cease and desist, without regard to whether a Petition**

for **Hearing is filed**, from charging, collecting or contracting for interest in excess of 6% per annum, directly or through any third-party, from any consumers in Pennsylvania. *See* 41 P.S. §§ 202 and 506(c)(3); 71 P.S. § 733-202.D; 63 P.S. § 281-12.

4. Autoloans, LLC, Car Loans, LLC, Loan Servicing Solutions, Management Solution, LLC, William McKibbin III, Kevin Cronin, Mark Edward Wiener, and Kelly S. Bonner, jointly and severally, shall **immediately cease and desist, without regard to whether a Petition for Hearing is filed**, from collecting any further payments of principal or interest on any existing loan where the borrower is a Pennsylvania resident or the collateral is a motor vehicle titled and registered in Pennsylvania. 41 P.S. §§ 202 and 506(c)(3); 71 P.S. § 733-202.D; 63 P.S. § 281-12.

5. Autoloans, LLC, Car Loans, LLC, Loan Servicing Solutions, Management Solution, LLC, William McKibbin III, Kevin Cronin, Mark Edward Wiener, and Kelly S. Bonner, jointly and severally, shall **immediately cease and desist, without regard to whether a Petition for Hearing is filed**, from taking any action to repossess any collateral for loans of \$50,000 or less which it made to Pennsylvania residents. 41 P.S. § 506(c)(5); 63 P.S. § 281-23, 281-24.

6. Autoloans, LLC, Car Loans, LLC, Loan Servicing Solutions, Management Solution, LLC, William McKibbin III, Kevin Cronin, Mark Edward Wiener, and Kelly S. Bonner, jointly and severally, shall **immediately cease and desist, without regard to whether a Petition for Hearing is filed**, from assigning or taking assignment of any loan in the principal amount of \$50,000 or less at interest in excess of 6% per annum. *See* 41 P.S. § 506(c)(5); 71 P.S. § 733-202.D.

7. Autoloans, LLC, Car Loans, LLC, Loan Servicing Solutions, Management Solution, LLC, William McKibbin III, Kevin Cronin, Mark Edward Wiener, and Kelly S. Bonner,

jointly and severally, shall immediately cease and desist, without regard to whether a Petition for Hearing is filed, from filing negative credit reports with any credit bureau.

8. Autoloans, LLC, Car Loans, LLC, Loan Servicing Solutions, Management Solution, LLC William McKibbin III, Kevin Cronin, Mark Edward Wiener, and Kelly S. Bonner, jointly and severally, shall provide, within ten days without regard to whether a Petition for Hearing is filed, to the Compliance Office in electronic format on compact disk, thumb drive or the equivalent, the following information:

- a. The name, address and phone number of each borrower that resided in Pennsylvania;
- b. The date of the loan or pledge;
- c. The amount of the loan;
- d. The amount of 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;
- e. The status or balance of the loans;
- f. 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
- g. The status of any motor vehicle offered as collateral (or any other personal property offered as collateral for a loan) e.g. under contract for repossession, redeemed by consumer, repossessed, sold, in storage, etc.
- h. The name, address, e-mail and phone number of each borrower whose collateralized motor vehicle has been repossessed;
- i. For each motor vehicle repossessed, the date of the repossession;
- j. For each motor vehicle repossessed, the company's name and address that repossessed the vehicle;
- k. For each motor vehicle repossessed, the make, model and year and color of the vehicle; and
- l. Any additional information requested as the Department deems necessary.

See 41 P.S. § 506(c)(5); 71 P.S. § 733-202.D.

9. Autoloans, LLC, Car Loans, LLC, Loan Servicing Solutions, Management Solution, LLC, William McKibbin III, Kevin Cronin, Mark Edward Wiener, and Kelly S. Bonner, jointly and severally, shall, within thirty days of this Order unless a Petition for Hearing is timely filed, remove all credit reports previously made, whether positive or negative, in regard to

any loan brokered, made, funded, purchased or assigned to Autoloans, LLC, Car Loans, LLC, Loan Servicing Solutions, in amounts less than \$50,000, with interest charged, collected, or contracted for more than 6% interest per annum. See 41 P.S. §§ 506(c)(3); 506(c)(5); 71 P.S. § 733-202.D.

10. Autoloans, LLC, Car Loans, LLC, Loan Servicing Solutions, Management Solution, LLC, William McKibbin III, Kevin Cronin, Mark Edward Wiener, and Kelly S. Bonner, jointly and severally, shall refund, within 30 days of this Order unless a Petition for Hearing is timely filed, all interest paid in excess of 6% by Pennsylvania residents. However, nothing in this Order shall negate the right of a consumer pursuant to the PLA to recover by action at law any and all interest and charges paid in excess of those permitted under this act, plus penalty of \$50.00. Nor shall anything in this Order negate the right of a borrower to sue for triple the amount of interest over 6% under the LIPL. 41 P.S. §§ 506(c)(3), 506(c)(5); 63 P.S. § 281-12(E).

11. Autoloans, LLC, Car Loans, LLC, Loan Servicing Solutions, Management Solution, LLC, William McKibbin III, Kevin Cronin, Mark Edward Wiener, and Kelly S. Bonner, jointly and severally, shall, within 30 days of this Order unless a Petition for Hearing is timely filed, provide the Department with a listing of the refunds made in accordance with the previous paragraph. The listing shall include:

- a. The name, address and phone number of each consumer;
- b. The dollar amount of the refund to each consumer;
- c. The date of the refund to each consumer; and
- d. The sum total of all refunds to all of the consumers.
- e. The manner in which the refund was made, i.e., by check, ACH, etc.

12. Autoloans, LLC, Car Loans, LLC, Loan Servicing Solutions, Management Solution, LLC, William McKibbin III, Kevin Cronin, Mark Edward Wiener, and Kelly S. Bonner,

jointly and severally shall, in the event a **Petition for Hearing is filed**, bear the cost of the Department's enforcement action if the Compliance Office prevails as to unlicensed activity.

13. Autoloans, LLC, Car Loans, LLC, Loan Servicing Solutions, Management Solution, LLC, William McKibbin III, Kevin Cronin, Mark Edward Wiener, and Kelly S. Bonner, jointly and severally, henceforth shall be prohibited from lending money to Pennsylvania consumers, either secured or unsecured, as a pawnbroker or as a consumer discount company, or in any other capacity. 41 P.S. § 506(c)(2).

14. Autoloans, LLC, Car Loans, LLC, Loan Servicing Solutions, Management Solution, LLC, William McKibbin III, Kevin Cronin, Mark Edward Wiener, and Kelly S. Bonner, jointly and severally, shall pay, within 30 days of this Order unless a **Petition for Hearing is timely filed**, a fine of \$412,500 representing \$2,500 for each known Pennsylvania resident. 41 P.S. §§ 505, 505(b).

15. Autoloans, LLC, Car Loans, LLC, Loan Servicing Solutions, Management Solution, LLC, William McKibbin III, Kevin Cronin, Mark Edward Wiener, and Kelly S. Bonner, jointly and severally, shall, within thirty days of this Order unless a **Petition for Hearing is timely filed**, provide the Commonwealth of Pennsylvania's Department Transportation with anything necessary to have all liens against all Pennsylvania residents marked satisfied and released.

16. Nothing in this Order shall preclude the Department from commencing additional enforcement action against Autoloans, LLC, Car Loans, LLC, Loan Servicing Solutions, Management Solution, LLC, William McKibbin III, Kevin Cronin, Mark Edward Wiener, and

Kelly S. Bonner, or persons associated therewith, as the Department, through its Compliance Office, deems necessary based on information unknown as of the date of this Order.

IT IS SO ORDERED.

Redacted

James Keiser, Administrator
Department of Banking and Securities
Compliance Office

FILED

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DEPARTMENT OF BANKING AND SECURITIES

JUN 24 PM 2:24

PA DEPARTMENT OF
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and other companies and :
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Docket No. 15 0017 (BNK C&D)

RESPONDENTS :

CERTIFICATE OF SERVICE

I hereby certify that I have this day served a copy of the foregoing **Order to Cease and Desist, Prohibit, Pay a Fine, and Provide Restitution** 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:

Autoloans, LLC
433 Plaza Real
Suite 275
Boca Raton, FL 33432

Autoloans, LLC
6170 W. Lake Mead Blvd.
Las Vegas, NV 89108-2661

William McKibbin
7705 Solimar Circle
Boca Raton, FL 33433

Autoloans, LLC
P.O. Box 11
Rarotonga, Cook Islands
NAC: IND-N CFK-0

Kevin Cronin
3645 Dorrit Avenue
Boynton Beach, FL 33484-1119

Mark Edward Weiner
5405 Sunrise Blvd.
Delray Beach, FL 33484-1119

Kelly S. Bonner
2050 Polo Gardens Drive, Apt. #208
Wellington, FL 33414-2003

Dated: June 24, 2015

Redacted

Linda Carroll
Deputy Chief Counsel
Department of Banking and Securities
17 North Second Street, Suite 1300
Harrisburg, PA 17101
(717) 787-1471