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COMMONWEALTH OF PENNSYLVANIA 2019 JUL 26 AM 9: 33
DEPARTMENT OF BANKING AND SECURITIES

COMMONWEALTH OF PENNSYLVANIA :	PA DEPARTMENT OF
DEPARTMENT OF BANKING AND :	BANKING AND SECURITIES
SECURITIES, COMPLIANCE OFFICE :	
v. :	DOCKET NO. 18 0094 (BNK-CAO)
FULL SUPPORT SERVICES, INC :	

CONSENT AGREEMENT AND ORDER

The Commonwealth of Pennsylvania, acting through the Department of Banking and Securities (“Department”), Compliance Office (“Office”), has reviewed the business practices of Full Support Services, Inc. (“FSS”). Based on the results of its review, together with certain disclosures FSS has made to the Department, the Office believes that FSS operated in violation of the Debt Settlement Services Act, (“DSSA”), 63 P.S. § 2501 *et seq.* The parties to the above captioned matter, in lieu of litigation, hereby stipulate that the following statements are true and correct in the settlement of the above-captioned matter, and intending to be legally bound, hereby agree to the terms of this Consent Agreement and Order (“Order”).

BACKGROUND

1. The Department is the Commonwealth of Pennsylvania’s administrative agency authorized and empowered to administer and enforce the DSSA.
2. The Office is primarily responsible for administering and enforcing the DSSA for the Department.
3. FSS’s principal place of business is 2522 Chambers Road, Suite 184, Tustin CA 92780.

Unlicensed Period

4. The DSSA became effective on January 1, 2015.

5. The DSSA requires anyone marketing, soliciting, offering to provide or providing debt settlement services for a fee or other consideration to an individual residing in Pennsylvania at the time of the agreement to be licensed 63 P.S. § 2521.

6. FSS is not, and never has been, licensed under the DSSA.

7. FSS has been providing debt settlement services to Pennsylvania consumers for a fee while not licensed to do so.

Authority of the Department

8. The DSSA grants the Department the authority to issue orders as may be necessary for enforcement. 63 P.S. § 2571(4).

9. The Department may “impose a civil penalty of up to \$10,000 for each violation of this act.” 63 P.S. § 2574(a).

10. The Department has the authority to “[o]rder a person...to make restitution for actual damages to consumers caused by a violation of this act or to refund fees collected in violation of this act.” 63 P.S. § 2571(6).

VIOLATION

11. FSS violated the DSSA when they engaged in the business of a debt settlement services company in Pennsylvania while unlicensed. 63 P.S. § 2521.

RELIEF

12. Civil Penalty. FSS agrees to pay a civil penalty of \$61,250 due within thirty (30) days of the Effective Date of the Order. The payment shall be made by ACH or wire transfer, or if ACH or wire transfer is unavailable, by certified check, cashier’s check, teller’s check or money order made payable to the “Department of Banking and Securities” which shall be mailed, or delivered in person to the attention of: Department of Banking and Securities, Compliance Office, 17 N. Second Street, Suite 1300, Harrisburg, PA 17101-2290.

13. Corrective Action Upon the Effective Date of this Order, FSS shall not perform debt settlement services for a fee in Pennsylvania unless licensed to do so.

14. FSS may continue to service Pennsylvania clients under a debt settlement program if the company does not charge any fees for doing so.

15. Restitution FSS shall refund all fees and considerations in the amount of \$95,727.18 to all Pennsylvania clients within 30 days of the Effective Date of this Order. This applies to all Pennsylvania debt settlement agreements entered into by FSS with Pennsylvania clients on or after January 1, 2015. The refunds may be accomplished by crediting the refunds to the clients' settlement accounts or FSS shall provide to the Department confirmation that all fees have been refunded to Pennsylvania clients.

FURTHER PROVISIONS

16. Consent. FSS hereby knowingly, willingly, voluntarily and irrevocably consents to the entry of this Order pursuant to the Department's order authority under the DSSA and agrees that FSS understands all of the terms and conditions contained herein. FSS, by voluntarily entering into this Order, waives any right to a hearing or appeal concerning the terms, conditions and/or penalties set forth in this Order.

17. Consumer Rights. The Order shall not limit or impair a consumer's rights under the DSSA.

18. Publication. The Department will publish this Order pursuant to its authority in Section 302.A.(5) of the Department of Banking and Securities Code, 71 P.S. § 733-302.A (5).

19. Entire Agreement. This Order contains the whole agreement between the parties. There are no other terms, obligations, covenants, representations, statements, conditions, or otherwise, of any kinds whatsoever concerning this Order. This Order may be amended in writing by mutual agreement by the Office and FSS.

20. Binding Nature. The Department and FSS, and all officers, owners, directors, employees, heirs and assigns of FSS intend to be and are legally bound by the terms of this Order.

21. Counsel. This Order is subject to review by the Department's Legal Division. This Order is entered into by the parties upon full opportunity for legal advice from legal counsel.

22. Effectiveness. FSS hereby stipulates and agrees that the Order shall become effective on the date that the Department's Legal Division docket this Order ("Effective Date").

23. Other Enforcement Action.

a. The Department reserves all of its rights, duties, and authority to enforce all statutes, rules and regulations under its jurisdiction against FSS in the future regarding all matters not resolved by this Order.

b. FSS acknowledges and agrees that this Order is only binding upon the Department and not any other local, state or federal agency, department or office regarding matters within this Order.

24. Authorization. The parties below are authorized to execute this Order and legally bind their respective parties

25. Counterparts. This Order may be executed in separate counterparts and by facsimile or electronic mail in portable document format "PDF."

26. Titles. The titles used to identify the paragraphs of this document are for the convenience of reference only and do not control the interpretation of this document.

WHEREFORE, in consideration of the foregoing, including the recital paragraphs, the Department of Banking and Securities, Compliance Office and Full Support Services, intending to be legally bound do hereby execute this Consent Agreement and Order.

FOR THE COMMONWEALTH OF
PENNSYLVANIA, DEPARTMENT OF
BANKING AND SECURITIES,
COMPLIANCE OFFICE

Redacted

James Keiser, Chief
Compliance Office
Department of Banking and Securities

Date: July 26, 2019

FOR FULL SUPPORT SERVICES, INC

Redacted

(Officer Signature)

JOSHUA P. BLANDI
(Print Officer Name)

PRESIDENT
(Title)

Date: 07/25/2019

