

COMMONWEALTH OF PENNSYLVANIA
DEPARTMENT OF BANKING AND SECURITIES

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

v. :

RAM AUTO SOLUTIONS LLC :

Docket No.: 23 0003 (BNK-C&D)

NOTICE OF RIGHT TO HEARING AND APPEAL

You, RAM Auto Solutions LLC, have the right to a hearing to challenge the attached Suspension Order. *See* 12 Pa.C.S. § 6218(b) and 2 Pa.C.S. § 504. To request a hearing, you must submit the request in writing to the Docket Clerk within 30 days of the date of this Order. **If the Docket Clerk does not receive your written request, then you will waive your right to a hearing and the Order will be deemed final. Final orders of the Department may be appealed to the Pennsylvania Commonwealth Court. *See* 12 Pa.C.S. § 6205, 2 Pa.C.S. § 702 and 42 Pa.C.S. § 763.**

The hearing request and all other documents relating to this matter must be filed via first-class mail and electronic mail with the Docket Clerk:

Eileen Smith, Docket Clerk
Department of Banking and Securities
17 N. Second Street, Suite 1300
Harrisburg, PA 17101
Email: RA-BNDOCKETCLERK@pa.gov

Further, you must serve a copy of the hearing request on the person who signed the attached Order by providing a copy to their counsel indicated below:

Charles D. Vance, Jr., Esquire
Assistant Counsel
Department of Banking and Securities
17 N. Second Street, Suite 1300
Harrisburg, PA 17101
chvance@pa.gov

Once you file your hearing request, 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.

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v.	:	
	:	
RAM AUTO SOLUTIONS LLC	:	Docket No. : 23_0003_(BNK-ORD)
	:	

SUSPENSION ORDER

Through this Order, the Department of Banking and Securities (“Department”), Compliance Office (“Office”), hereby notifies RAM Auto Solutions LLC (“RAM”) that its Installment Seller license will be suspended within 30 days and this Order will become final. In support of its Order, the Office states the following:

PARTIES

1. The Department is the Commonwealth of Pennsylvania’s administrative agency authorized and empowered to administer and enforce the Consumer Credit Code (“CCC”) as related to motor vehicle sales finance, 12 Pa. C.S. § 6201 *et seq.*
2. The Office is primarily responsible for administering and enforcing the CCC for the Department.
3. RAM is currently licensed as an Installment Seller, license no. 66400.
4. RAM was, at all times material herein, a Pennsylvania Limited Liability Company with a principal place of business at 4915 A. Street Philadelphia, PA 19120.

BACKGROUND

5. Section 6203 of the CCC states in pertinent part, “Authority of department. (a) Powers.--The department has the authority to do any of the following: (1) Investigate the business activities of a licensee and person engaged in a business contemplated by this chapter by the following means: (i) Examining the records of the licensee and person ... (2) Examine the records, safes and vaults of a person described under subsection (b)(2) for the purpose of discovering violations of this chapter.” 12 Pa. C.S. § 6203(a).

6. Section 6204(d) of the CCC states in pertinent part, “Records (d) Preservation. -- Records of a licensee shall be preserved and available for examination by the department for at least two years after making the final entry therein.” 12 Pa. C.S. § 6204(d).

7. The Department setup an examination to be conducted of RAM on April 08, 2022. Required and requested examination material was due to the Department from RAM on April 7, 2022.

8. On April 19, 2022; May 19, 2022; and June 16, 2022, Examiner Ferrari attempted to call Manley Pack, Examination contact for RAM, at (215) 324-8125 and left a voicemail for Mr. Pack to return his call to advise on the status of the examination materials that were due on April 7, 2022. Examiner Ferrari also mentioned in his voicemail that the Pennsylvania Department of Banking and Securities has made numerous attempts to contact Mr. Pack via phone and email to facilitate a routine compliance examination of RAM and failure to allow for an examination could result in punitive actions including fines, license suspension, and/or license revocation. The aforementioned telephone number was registered, by RAM, with the Department.

9. On June 29, 2022, Examiner Ferrari attempted to call Manley Pack at (215) 324-8125 and left a voicemail for Mr. Pack regarding the multiple voicemails and contact attempts

relating to an examination of RAM. As a result of the lack of attention to this matter, the Department referred the matter to the Department's Eastern Regional Manager to begin the revocation process absent a response from RAM by the close of business on June 9, 2022.

10. Examiner Ferrari did not receive a response from RAM or Mr. Pack by June 29, 2022.

11. On July 22, 2022, Eastern Regional Manager Patrick Hall attempted to call Ronald Williams, Manager of RAM, at (215) 324-8125 and left a voicemail for Mr. Williams to return his call. Eastern Regional Manager Patrick Hall attempted to call a secondary number for RAM of (215) 966-9669, which telephone number had been registered, by RAM, with the Department and was advised by an unidentified male that this number is no longer for RAM.

12. On August 01, 2022; September 14, 2022; and September 26, 2022, Eastern Regional Manager Patrick Hall attempted to call Ronald Williams at (215) 324-8125 and left a voicemail for Mr. Williams to return his call.

13. On September 8, 2022 RAM renewed the Installment Seller license.

14. On September 26, 2022 Eastern Regional Manager Patrick Hall attempted to call Ronald Williams at (215) 324-8125 and reached a business in the Name of "Cash Solutions" which could not provide any information regarding RAM or Ronald Williams. Accordingly, Eastern Regional Manager Patrick Hall attempted to call Ronald Williams at (215) 669-1952, which telephone number was registered, by RAM, with the Department. Hall was able to speak to Mr. Williams. Mr. Williams stated he is in the process of removing Manley Pack from all operations and wishes to keep RAM's Installment Seller license. All contact information relating to RAM was updated to Ronald Williams.

15. Thereafter, on October 4, 2022, Examiner Ferrari sent an “invite” to Ronald Williams to become an authorized user for RAM in the Department’s Portal. Examiner Ferrari also sent a list of all requested examination materials to Ronald Williams at ramsautosolutions@hotmail.com. Examiner Ferrari attempted to call Ronald Williams at (215) 669-1952 and was unable to leave a message as the voicemail box was full. This e-mail address was registered, by RAM, with the Department.

16. On November 1, 2022 Examiner Ferrari attempted to call Ronald Williams at (215) 669-1952 and was unable to leave a message as the voicemail box was full. Examiner Ferrari sent an email to Mr. Williams at ramautosolutions@hotmail.com for Mr. Williams to contact him immediately.

17. Examiner Ferrari did not receive any response from RAM or Ronald Williams.

18. On November 7, 2022, Examiner McCoy sent an email to Ronald Williams at ramautosolutions@hotmail.com to contact her immediately regarding an examination for RAM. Examiner McCoy attempted to call Ronald Williams at (215) 239-7187, (215) 324-8125, and (215) 669-1952 but was unsuccessful in leaving a voicemail message as all three mailboxes were full. The third telephone number listed above, i.e., (215) 239-7187, was registered, by RAM, with the Department.

19. On November 8, 2022, Examiner McCoy received an email from Ronald Williams stating he would call her that morning. Examiner McCoy responded to Mr. Williams email advising him to call Eastern Regional Manager, Patrick Hall, at (717) 425-5460 regarding the requested examination materials.

20. On November 14, 2022 Examiner McCoy sent an email to Ronald Williams at ramautosolutions@hotmail.com to contact her immediately regarding an examination for RAM.

21. On November 18, 2022, Examiner McCoy attempted to call Ronald Williams at (215) 239-7187 but was unable to leave a message as the mailbox was full. Examiner McCoy attempted to call Mr. Williams at (215) 324-8125 and the number was out of service. Examiner McCoy attempted to call Mr. Williams at (215) 669-1952 and left a voicemail message for Mr. Williams to return her call.

22. On November 21, 2022, Examiner McCoy sent an email to Ronald Williams at ramautosolutions@hotmail.com to contact her immediately regarding an examination for RAM. Examiner McCoy attempted to call Ronald Williams at (215) 239-7187 but was unable to leave a message as the mailbox was full. Examiner McCoy attempted to call Mr. Williams at (215) 324-8125 and the number was out of service. Examiner McCoy attempted to call Mr. Williams at (215) 669-1952 but was unable to leave a message as the mailbox was full. Examiner McCoy received an email from Ronald Williams stating he would call Examiner McCoy the following morning.

23. On November 22, 2022, Examiner McCoy sent Ronald Williams an email advising him to call Eastern Regional Manager, Patrick Hall, at (717) 425-5460 regarding the requested examination materials.

24. On November 28, 2022, Examiner McCoy sent an email to Ronald Williams at ramautosolutions@hotmail.com to contact her immediately regarding an examination for RAM. Examiner McCoy attempted to call Ronald Williams at (215) 239-7187 and spoke to Mr. Williams. Mr. Williams stated he had been having difficulties getting into the Department's Portal. Examiner McCoy asked Mr. Williams for an accurate email address for him to be able to give him access as an authorized user for RAM in the Department's Portal. Mr. Williams provided the email address of ramautosolutions@hotmail.com. Examiner McCoy told Mr. Williams she would provide him access as an authorized user for RAM with the email address he provided as well as provide him

an email with instructions on how to get into the Department's Portal with Examiner McCoy's contact information. Mr. Williams stated he would get into the Portal later that afternoon. Examiner McCoy added Ronald Williams as an authorized user with the email address of ramautosolutions@hotmail.com. Examiner McCoy sent Ronald Williams an email at ramautosolutions@hotmail.com with step-by-step instructions to gain access to the Department's Portal.

25. On December 5, 2022, Examiner McCoy attempted to call Ronald Williams at (215) 239-7187 and was unsuccessful as the call could not be completed. Examiner McCoy attempted to call Ronald Williams again at (215) 239-7187 and was unsuccessful as the call could not be completed. Examiner McCoy sent Ronald Williams an email at ramautosolutions@hotmail.com following up on obtaining access to the Department's Portal.

26. On December 12, 2022 Examiner McCoy attempted to call Ronald Williams at (215) 239-7187 and was unable to leave a voicemail as the mailbox was full. Examiner McCoy attempted to contact Ronald Williams at (215) 669-1952 and was advised by an unidentified man that Ronald would be in later that morning. Examiner McCoy attempted to call Ronald Williams at (215) 669-1952 and was unable to leave a voicemail as the mailbox was full. Examiner McCoy sent Ronald Williams an email at ramautosolutions@hotmail.com following up on obtaining access to the Department's Portal.

27. On December 19, 2022, Examiner McCoy attempted to call Ronald Williams at (215) 239-7187 and was unable to leave a voicemail as the mailbox was full. Examiner McCoy attempted to call Ronald Williams at (215) 669-1952 and was unable to leave a voicemail as the mailbox was full. Examiner McCoy sent Ronald Williams an email at ramautosolutions@hotmail.com following up on obtaining access to the Department's Portal.

28. Examiner McCoy received no response from either RAM or Ronald Williams.

29. As of the date of this Order, the Department has not received all requested examination materials.

AUTHORITY

30. “The department has the authority to do any of the following: (1) Investigate the business activities of a licensee and person engaged in a business contemplated by this chapter by the following means: (i) Examining the records of the licensee and person. (ii) Accessing the offices and places of business of the licensee and person and the records of the licensee and person. (2) Examine the records, safes and vaults of a person described under subsection (b) (2) for the purpose of discovering violations of this chapter. ... (4) Prescribe the minimum information to be shown in the records of a licensee so as to enable the department to determine compliance with the provisions of this chapter. (5) Promulgate regulations and issue orders, statements of policy and written interpretations as necessary or appropriate for the interpretation or enforcement of this chapter.” 12 Pa. C.S. § 6203(a).

31. Section 6218(a) of the CCC authorizes the Department “upon notice under subsection (b),... to revoke or suspend a license if it discovers a fact or condition that, had it existed or been discovered at the time of filing of any license application, would have warranted disapproval of the application or if it finds that the licensee has engaged in any of the following:... (2) Violated a provision of [the CCC]. (3) Violated an order or regulation issued by the department under and within the authority of [the CCC]. (4) Failed to comply with a demand, order or regulation of the department lawfully made by the Department under and within the authority of [the CCC]. (5) Refused or refuses to permit the department to make examinations

authorized by [the CCC]. (7) Failed to maintain satisfactory records required by [the CCC] or prescribed by the department.” 12 Pa. C.S. § 6218(a)(2,3,4,5, and 7).

32. The Department has the authority to issue enforcement orders including the authority to suspend any license issued pursuant to the CCC if a license has failed to comply with or violated any provision of the CCC. 12 Pa. C.S. § § 6203, 6218.

VIOLATIONS

33. By failing to provide Department requested records relating to RAM’s business activities for purposes of a lawful examination, RAM is in violation of 12 Pa. C.S. § § 6203(a), 6204(d), and 6218(a)(5). Further, in failing to comply with repeated demands by the Department lawfully made, RAM is in violation of 12 Pa. C.S. § 6218 (a)(4).

RELIEF

AND NOW THEREFORE, since RAM has failed to provide Department requested records relating to RAM’s business activities and has failed to comply with a demand by the Department, the Office, pursuant to the authority referenced above, hereby issues the following Order:

34. No later than the effective date of this Order, RAM’s Installment Seller license shall be **SUSPENDED**, meaning that RAM and its owners, officers, directors and/or employees, shall not engage in the Installment Seller business in Pennsylvania as defined in Section 6202 of the CCC, until such time that the Office lifts the suspension.

35. The suspension will not be lifted until RAM provides the requested records necessary for the Department to conduct an examination, an examination has been conducted, any and all violations from the examination have been rectified, and the expenses incurred and assessed in connection with the examination pursuant to Section 6203(d) of the CCC have been paid. The

requested records shall be remitted through the Department's Portal at <https://www.portal.dobs.pa.gov>.

36. Nothing in this Order shall prevent the Office from taking any further administrative action as deemed necessary.

37. The effective date of this Order shall be 30 days after the date this Order is signed below.

IT IS SO ORDERED.

Redacted

John Talalai, Director
Compliance Office
Department of Banking and Securities



01/12/2023

(Date)

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DEPARTMENT OF BANKING AND SECURITIES**

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RAM AUTO SOLUTIONS LLC

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Docket No.: 23 0003 (BNK-ORD)

CERTIFICATE OF SERVICE

I hereby certify that I have this day served a copy of the foregoing Suspension 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, 33.36 and 33.37:

BY CERTIFIED AND FIRST CLASS MAIL

RAM Auto Solutions LLC
4915 A. Street
Philadelphia, PA 19120

Dated this 19th day of January 2023.

Redacted

Eileen Smith, Legal Assistant _____
Office of Chief Counsel
FOR: Commonwealth of Pennsylvania
Department of Banking and Securities
17 North Second Street, Suite 1300
Harrisburg, PA 17101
(717) 787-1471