



Massachusetts Division of Banks

Administrative Enforcement Actions

3rd Quarter 2020

Depository & Non-Depository Entities

Released: November 2020

Enforcement Actions

For a complete list of all public orders by year, use the following link: [Massachusetts DOB Enforcement Actions](#).

Additional information can be found at The Division of Banks [website](#).

Institution's/Individual's Name	License Type	Date of Order	Order Type	Link to Order
Hashi Money Wiring, LLC	FTA	9/17/2020	Consent Order	Link
Fair Collections & Outsourcing of New England, LLC	DC	9/16/2020	Consent Order	Link
Ralph Cerundolo d/b/a Recreations Finance Company	MVSFC and RISFC	9/02/2020	Consent Order	Link
Source One Financial Corporation	MVSFC	8/26/2020	Consent Order	Link
Freedom Mortgage Corporation	ML and MB	7/30/2020	Consent Order	Link
Affirm, Inc.	LS	7/02/2020	Agreement	Link

License Types – FTA – Foreign Transmittal Agency; DC – Debt Collector; MVSFC – Motor Vehicle Sales Finance Company; RISFC – Retail Installment Sales Finance Company; ML – Mortgage Lender; MB – Mortgage Broker; LS – Loan Servicer

Hashi Money Wiring, LLC entered into a Consent Order to resolve allegations of substantial non-compliance with applicable state laws and regulations governing the conduct of those engaged in the business of a foreign transmittal agency.

Fair Collections & Outsourcing of New England, LLC entered into a Consent Order to resolve allegations of substantial non-compliance with applicable state laws and regulations governing the conduct of those engaged in the business of a debt collector.

Ralph Cerundolo d/b/a Recreations Finance Company entered into a Consent Order to resolve allegations of substantial non-compliance with applicable state laws and regulations governing the conduct of those engaged in the business of a motor vehicle sales finance company and a retail installment sales finance company.

Source One Financial Corporation entered into a Consent Order to resolve allegations of substantial non-compliance with applicable state laws and regulations governing the conduct of those engaged in the business of a motor vehicle sales finance company.

Freedom Mortgage Corporation entered into a Consent Order to resolve allegations that the company violated the Home Mortgage Disclosure Act (HMDA).

Affirm, Inc. entered into an Agreement to resolve allegations of operating as a third party loan servicer without the appropriate license.

The Division terminated the following Consent Orders:

Home Point Financial Corporation: Consent Order was terminated on September 8, 2020.

Ralph Cerundolo dba Recreational Finance Company: Consent Order of October 9, 2014 was superseded and replaced by Consent Order of September 2, 2020.

Source One Financial Corporation: Consent Order of December 5, 2013 was terminated and replaced by Consent Order of August 26, 2020.

Freedom Mortgage Corporation: Consent Order of August 21, 2016 was superseded and replaced by Consent Order of July 30, 2020.

Penalties & Reimbursements

Administrative Penalties

The Division collected a total of **\$2,329,700.00** in administrative penalties.

Consumer Reimbursements

The Division reimbursed **\$33,489.40** to **42** affected consumers.

Responding to the Coronavirus Pandemic (COVID-19)

- On July 18, the Baker-Polito Administration extended until October 17 Chapter 65 of the Acts of 2020, An Act Providing for a Moratorium on Evictions and Foreclosures during the COVID-19 Emergency which was set to expire on August 18. In response, the Division updated its frequently asked questions (FAQs) which can be found [here](#).
- In July, the FBI reported a spike in fraudulent unemployment insurance claims related to the ongoing COVID-19 pandemic involving the use of stolen personally identifiable information (PII). The Division posted information about the methods used in this fraud and how to combat them. Read the information [here](#).
- The Division hosted another webcast in the *DOB connects: Compliance Strong* series, [Fair Lending Risk and COVID 19: Strategies for Maintaining Fair Lending Compliance](#). This webcast series is dedicated to issues related to COVID-19 for the financial services industry. These webcasts and the presentation slides can be found [here](#).

Other News and Updates

- In July, the Division announced \$1,500,000 in grants to support foreclosure prevention education and first-time homebuyer counseling programs throughout the Commonwealth. Twenty awards in total were made to ten consumer counseling organizations and ten foreclosure prevention regional centers. This is the thirteenth-consecutive year the Division has awarded financial education and foreclosure prevention funds to support Massachusetts residents pursuing homeownership opportunities as well as those families working to stay in their homes. Read more about these grants [here](#).
- In September, the Massachusetts Division of Banks, along with the Federal Trade Commission and more than 50 federal and state law enforcement partners, announced a nationwide law enforcement and outreach initiative to protect consumers from phantom debt collection and abusive and threatening debt collection practices. Information about the initiative, called Operation Corrupt Collector, can be found [here](#). In addition, the Division posted [Steps to Take When Called by a Debt Collector](#) and a [Know Your Rights](#) video to assist consumers when they are faced with these abusive practices.
- The Division launched a *DOB connects* series focusing on diversity, equity, and inclusion. Two webcasts in the series have been broadcast, [How to Be a Successful Leader and Catalyst for Diversity](#) and [Diversity, Equity, and Inclusion: A Priority for the Financial Industry and for Regulators](#).