



Massachusetts Division of Banks

Administrative Enforcement Actions

3rd Quarter 2016

Depository & Non-Depository Entities

Released: November 2016

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
Liberty Home Equity Solutions, Inc.	MC	July 6, 2016	Consent Order	Link
PoaPay, LLC.	FT	July 13, 2016	Consent Order	Link
Stephen A. Becker	MLO	August 16, 2016	Consent Order	Link
Freedom Mortgage Corporation	MC	September 21, 2016	Consent Order	Link
License Types – FT: Foreign Transmittal Agency; MC: Mortgage Company (Lender/Broker); MLO: Mortgage Loan Originator				

The Division of Banks entered into **four** Consent Orders during the third quarter of 2016:

Liberty Home Equity Solutions, Inc. entered into a **Consent Order** related to the failure to properly fund loans in a timely basis, inadequate oversight of third-party providers, and insufficient policies and procedures.

PoaPay, LLC entered into a **Consent Order** to cease business, surrender its license, and be subject to a 10-year prohibition period for re-application. The Order resolved the outstanding April 28, 2016 Order to Show Cause for unlicensed activity, failure to maintain or follow policies and procedures related to Bank Secrecy Act/Anti-Money Laundering Compliance Program, improper recordkeeping, and other violations of Massachusetts regulations.

Stephen A. Becker entered into a **Consent Order** resolving the outstanding September 17, 2015 Temporary Order to Cease and Desist and Notice of Civil Assessment for misleading and deceptive advertising practices concerning reverse mortgage products.

Freedom Mortgage Corporation entered into a **Consent Order** related to violations of Massachusetts and federal laws, and regulations. The Order required the payment of an administrative penalty of \$2 million.

Penalties & Reimbursements

Administrative Penalties

The Division collected a total of **\$2,049,500.00** in administrative penalties.

Consumer Reimbursements

The Division reimbursed **\$104,196.85** to affected consumers.

Other News & Updates

The Division and Massachusetts Office of the Attorney General held an informational session on debt collection on September 22, 2016. The session was organized to solicit input from all interested stakeholders to inform potential rulemaking concerning the industry. Comments were requested in response to several inquiries including changes in the debt collection industry, developments in the debt buying industry, passive v. active debt buyers, scope of attorney licensing exemption, and should prohibited practices be expanded. The public comment period closed on October 21, 2016. Comments received are in process of being reviewed.