

OCCC CASE NO. L25-013

|                                |   |                     |
|--------------------------------|---|---------------------|
| IN THE MATTER OF:              | § | BEFORE THE          |
|                                | § |                     |
| MASTER FILE NO.: 15162         | § | OFFICE OF CONSUMER  |
| SOUTH TEXAS PAWN LLC           | § |                     |
| d/b/a CULLEN PAWN              | § | CREDIT COMMISSIONER |
| 4001 SAM HOUSTON PKWY E., STE. | § |                     |
| 112                            | § | STATE OF TEXAS      |
| HOUSTON, TEXAS 77047           | § |                     |

**ORDER IMPOSING ADMINISTRATIVE PENALTY**

The Office of Consumer Credit Commissioner (“OCCC”) issues this Order Imposing Administrative Penalty against South Texas Pawn LLC d/b/a Cullen Pawn (“Cullen Pawn”).<sup>1</sup>

**Statement of Facts and Law**

Cullen Pawn is a pawnshop licensed by the OCCC under Chapter 371 of the Texas Finance Code. Cullen Pawn operates under master file number 15162 at one licensed location, under license number 56954. Cullen Pawn’s compliance officer is David Ulsh, and its designated contact address is 4001 Sam Houston Pkwy E., Ste. 112, Houston, Texas 77047.

A pawnshop must file annual reports with the OCCC.<sup>2</sup> A pawnshop must comply with all instructions from the OCCC relating to submitting the report, and must file a report for each licensed location.<sup>3</sup> The report is due by July 31 of each year for the prior calendar year’s activity.<sup>4</sup>

On October 21, 2019, the OCCC issued an Order to File Timely and Accurate Annual Reports (the “Order”) against Cullen Pawn for failing to timely file its 2018 annual report. The Order required Cullen Pawn to timely file complete and accurate future reports.

<sup>1</sup> Tex. Fin. Code § 14.208.

<sup>2</sup> Tex. Fin. Code § 371.201; 7 Tex. Admin. Code § 85.502.

<sup>3</sup> 7 Tex. Admin. Code § 85.502.

<sup>4</sup> 7 Tex. Admin. Code § 85.502; <https://occc.texas.gov/industry/pawnshops-and-pawn-employees/annual-reports>

On October 7, 2022, the OCCC issued an Order Imposing Administrative Penalty against Cullen Pawn for failing to timely file its 2021 annual report. The Order required Cullen Pawn to file its 2021 annual report and pay an administrative penalty of \$500.00 (calculated as \$500.00 each for Cullen Pawn's one licensed location). Cullen Pawn ultimately filed its 2021 annual report and paid the \$500.00 administrative penalty.

Cullen Pawn did not file its 2023 annual report by the deadline of July 31, 2024.

The Consumer Credit Commissioner ("Commissioner") may issue an injunction ordering a pawnshop to file one or more complete, accurate, and timely annual reports if the Commissioner has reasonable cause to believe that the pawnshop is violating Chapter 371 of the Texas Finance Code.<sup>5</sup> The Commissioner may impose an administrative penalty on a pawnshop that violates an injunction.<sup>6</sup>

By failing to timely file its 2023 annual report, Cullen Pawn has violated Chapter 371 of the Texas Finance Code and the OCCC's Order to File Timely and Accurate Annual Reports.

## **Order**

IT IS ORDERED that South Texas Pawn LLC d/b/a Cullen Pawn:

1. pay an administrative penalty in the amount of \$1,000.00 (calculated as \$1,000.00 each for Cullen Pawn's one licensed location) within 30 days after the date of this Order; and
2. file its 2023 annual report within 30 days of after the date of this Order, if it has not already done so.

Pawnshop annual reports must be submitted through the OCCC's Application Licensing Examination and Compliance System (ALECS): [alecs.occc.texas.gov](http://alecs.occc.texas.gov). Instructions are available by clicking the "File Annual Report" button on the OCCC's home page, [occc.texas.gov](http://occc.texas.gov).

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<sup>5</sup> Tex. Fin. Code §§ 14.208, 371.302(a).

<sup>6</sup> Tex. Fin. Code §§ 14.208(c), 371.303; 7 Tex. Admin. Code § 85.604(b).

## Right to Request Hearing

You have the right to request a hearing regarding this Order.<sup>7</sup> To request a hearing, you must send a written hearing request to the OCCC no later than 30 days after the date of this Order.<sup>8</sup> You must send your request to Vivek Vedanarayanan, Assistant General Counsel, by mail to 2601 N. Lamar Blvd., Austin, Texas 78705, or by email to [vivek.vedanarayanan@occc.texas.gov](mailto:vivek.vedanarayanan@occc.texas.gov).

If you request a hearing, a hearing on this matter will be set and conducted in accordance with Chapter 2001 of the Texas Government Code.<sup>9</sup> If you fail to request a hearing by the deadline, this Order will be considered final and enforceable.<sup>10</sup>

All communications with the OCCC concerning this matter must be through Vivek Vedanarayanan, Assistant General Counsel, who may be contacted by mail at 2601 N. Lamar Blvd., Austin, Texas 78705, by telephone at 512-936-7623, or by email at [vivek.vedanarayanan@occc.texas.gov](mailto:vivek.vedanarayanan@occc.texas.gov)

Signed this 10th day of October, 2024.

/s/ Leslie Pettijohn  
Leslie L. Pettijohn  
Consumer Credit Commissioner  
State of Texas

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<sup>7</sup> Tex. Fin. Code § 14.208(b).

<sup>8</sup> Tex. Fin. Code § 14.208(b).

<sup>9</sup> Tex. Fin. Code § 14.208(b).

<sup>10</sup> Tex. Fin. Code § 14.208(c).

## CERTIFICATE OF SERVICE

I certify that on October 10, 2024, a true and correct copy of this Order Imposing Administrative Penalty has been sent to South Texas Pawn LLC d/b/a Cullen Pawn by regular mail and certified mail, return receipt requested, at:

CMRRR# 9214 8901 9403 8300 0078 3770 41  
South Texas Pawn LLC  
Attn: David Ulsh, Compliance Officer  
4001 Sam Houston Pkwy E., Ste. 112  
Houston, TX 77047

CMRRR# 9214 8901 9403 8300 0078 3770 58  
South Texas Pawn LLC  
Attn: David Ulsh, Registered Agent  
2826 Rippling Springs Ct.  
Manuel, TX 77578

/s/ Vivek V. Vedanarayanan  
Vivek V. Vedanarayanan  
Assistant General Counsel  
Office of Consumer Credit Commissioner  
State Bar No. 24127068  
2601 North Lamar Blvd.  
Austin, Texas 78705  
512-936-7623 (phone)  
vivek.vedanarayanan@occc.texas.gov