

OCCC CASE NO. L21-00107

IN THE MATTER OF:	§	BEFORE THE
	§	
MASTER FILE NO.:1900063334	§	OFFICE OF CONSUMER
FIRST MONEY IN, LLC d/b/a	§	
LIBERTY LOANS	§	CREDIT COMMISSIONER
500 GRAPEVINE HWY., STE. 345	§	
HURST, TEXAS 76054	§	STATE OF TEXAS

**ORDER IMPOSING ADMINISTRATIVE PENALTY**

The Office of Consumer Credit Commissioner (“OCCC”) issues this Order Assessing Administrative Penalty for Violation of Injunctive Order against First Money In, LLC d/b/a Liberty Loans (“Liberty Loans”).<sup>1</sup>

**Statement of Facts and Law**

Liberty Loans is a credit services organization licensed to act as a credit access business under Chapter 393 of the Texas Finance Code. Liberty Loans operates under master file number 1900063334 at five licensed locations, under license number 162838, 162871, 163351, 163352, and 163353. Liberty Loans’s compliance officer is John Turner-Bloss, and its designated contact address is 500 Grapevine Hwy., Ste. 345, Hurst, Texas 76054.

A credit access business must file quarterly and annual reports with the Consumer Credit Commissioner (“Commissioner”).<sup>2</sup> A credit access business must submit its quarterly and annual reports on or before the following dates:

- 1st quarter report - April 30;
- 2nd quarter report - July 31;
- 3rd quarter report - October 31; and
- 4th quarter and annual report - January 31.<sup>3</sup>

If a credit access business violates the quarterly or annual reporting requirements for a second time within four quarters of a first reporting violation,

<sup>1</sup> Tex. Fin. Code § 14.208(c).

<sup>2</sup> Tex. Fin. Code §§ 393.622, 393.627; 7 Tex. Admin. Code § 83.5001(a).

<sup>3</sup> 7 Tex. Admin. Code § 83.5001(b).

the OCCC may impose an administrative penalty against the credit access business of \$500.00 for each of its licensed locations.<sup>4</sup> If a credit access business fails to file a quarterly or annual report again within four quarters of a second reporting violation, the OCCC may impose an administrative penalty of \$1,000.00 against the credit access business for each of its licensed locations.<sup>5</sup> The OCCC may seek revocation for any subsequent violation of the reporting requirements within four quarters of a third reporting violation.<sup>6</sup>

On March 3, 2020 the OCCC issued an Order to File Timely and Accurate Annual Reports against Liberty Loans for failing to file its Q4 and annual 2019 report.

Liberty Loans did not file its 2020 3rd quarter reports with the Commissioner on or before October 31, 2020. Additionally, Liberty Loans did not timely file one or more of its reports within the four quarters preceding the 2020 3rd quarter reports.

## **Order**

IT IS ORDERED that First Money In, LLC d/b/a Liberty Loans:

1. pay an administrative penalty in the amount of **\$2500.00**, calculated as \$500.00 each for Liberty Loans' five licensed locations, within 30 days of service of this Order; and
2. file its 2020 3rd quarter report within 30 days of service of this Order, if it has not already done so.

Credit access business quarterly and annual reports must be submitted through the OCCC's Application Licensing Examination and Compliance System (ALECS): [alecs.occ.texas.gov](http://alecs.occ.texas.gov). Instructions are available by clicking the "File Annual Report" button on the OCCC's home page, [occ.texas.gov](http://occ.texas.gov). A check made payable to 'Office of Consumer Credit Commissioner' may be mailed to 2601 N. Lamar Blvd., Austin, Texas 78705, for payment of the \$2500.00.

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<sup>4</sup> 7 Tex. Admin. Code § 83.5001(e)(3)(B).

<sup>5</sup> 7 Tex. Admin. Code § 83.5001(e)(3)(C).

<sup>6</sup> 7 Tex. Admin. Code § 83.5001(e)(4).

## Right to Request Hearing

You have the right to request a hearing regarding this Order.<sup>7</sup> Your request must be made in writing and sent to the OCCC not later than 30 days after you receive this Order. You must send your request to:

Audrey Spalding  
Office of Consumer Credit Commissioner  
2601 N. Lamar Blvd.  
Austin, Texas 78705

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>8</sup> If you fail to request a hearing by this deadline, this Order is considered final and enforceable.<sup>9</sup>

All communications with the OCCC concerning this matter must be through Audrey Spalding, Assistant General Counsel, who may be contacted by mail at 2601 N. Lamar Blvd., Austin, Texas 78705, by telephone at (512) 936-7659, or by email to [audrey.spalding@occc.texas.gov](mailto:audrey.spalding@occc.texas.gov).

Signed this 24 day of November, 2020.

/s/ Leslie L. 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(c).

**CERTIFICATE OF SERVICE**

I certify that on November 24, 2020, a true and correct copy of this Order Imposing Administrative Penalty has been sent to First Money In, LLC d/b/a Liberty Loans by regular mail and certified mail, return receipt requested, at:

CMRRR # 9214 8901 9403 8300 0025 5158 16  
First Money In, LLC  
Attn: John Turner-Bloss, Compliance Officer  
500 Grapevine Hwy., Ste. 345  
Hurst, TX 76054

CMRRR # 9214 8901 9403 8300 0025 5158 23  
First Money In, LLC  
Attn: First Money In, LLC, Registered Agent  
500 Grapvine Hwy., Ste. 345  
Hurst, TX 76054

/s/ Audrey Spalding \_\_\_\_\_  
Audrey Spalding  
Assistant General Counsel  
Office of Consumer Credit Commissioner  
State Bar No. 24111055  
2601 North Lamar Blvd.  
Austin, Texas 78705  
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