

**STATE OF NEW HAMPSHIRE
BANKING DEPARTMENT**

In The Matter of: Freedom Debt Relief, LLC
Case No. 10-535

CONSENT ORDER

WHEREAS, pursuant to RSA 399-D, the New Hampshire Banking Department (“Department”) is charged with regulating persons that “engage in the business of debt adjustment” in New Hampshire or with New Hampshire consumers.

WHEREAS, pursuant to RSA 399-D:22, II, the Department is authorized to examine the business affairs of any licensee or non-licensee debt adjuster to determine compliance with the RSA 399-D.

WHEREAS, Freedom Debt Relief, LLC (“Freedom Debt”) is a California limited liability company that provides debt adjustment services to consumers.

WHEREAS, pursuant to its authority under RSA 399-D:22, II, and RSA 399-D:25,VII, the Department, through the Consumer Credit Division, conducted an investigation of Freedom Debt.

WHEREAS, through its investigation, the Department found that:

1. Freedom Debt conducted debt adjuster activity from at least 2009 and was not licensed as a New Hampshire Debt Adjuster.
2. Freedom Debt conducted business with at least 434 New Hampshire consumers.
3. Of the 434 New Hampshire consumers, 98 New Hampshire consumers did not receive a net savings of monies owed, and therefore require a total restitution of \$133,603.55 as set out in Exhibit A attached hereto. Freedom Debt ceased charging

New Hampshire consumer fees in 2010.

WHEREAS, Freedom Debt makes the following acknowledgements:

1. Freedom Debt hereby acknowledges that were an administrative hearing to be held in this matter, the Department would introduce evidence demonstrating a substantial likelihood that Freedom Debt violated RSA 399-D.
2. Freedom Debt voluntarily enters into and signs this Consent Order without reliance upon any discussions between the Department and Freedom Debt, without the promise of a benefit of any kind (other than the concessions contained in this Consent Order), and without threats, force, intimidation or coercion of any kind.
3. The conduct described above, if proven, would constitute violations of state law, which could result in penalties pursuant to RSA 399-D:24, IV.
4. Freedom Debt understands the nature of the allegations set forth herein and that they constitute grounds for potential sanctions, as provided by law.
5. Freedom Debt acknowledges, understands, and agrees that it has the right to notice and an adjudicatory hearing to contest the matters set forth herein, including any appeal, and hereby waives those rights. Freedom Debt further acknowledges it waives the filing of any civil actions related to this matter.
6. Freedom Debt understands that its action in entering this Consent Order is a final act and not subject to reconsideration or judicial review or appeal.
7. Freedom Debt represents and warrants that it has all the necessary rights, powers and abilities to carry out the terms of this Consent Order.
8. Freedom Debt acknowledges that the Department is relying upon Freedom Debt's representations and warranties stated herein in making its determinations in this

matter.

9. Freedom Debt acknowledges that this Consent Order may be revoked and the Department may pursue any and all remedies available under the law against Freedom Debt for any violations of this Consent Order.
10. This Consent Order is binding on all heirs, assigns and successors in interest.
11. Freedom Debt has not made any admission of wrongdoing or liability through this Consent Order, and this Consent Order is not admissible in any Court other than for enforcement in connection with its terms.

WHEREAS, Freedom Debt consents to the Department imposing the following sanctions:

1. Freedom Debt shall pay \$133,603.55 in restitution to the 98 consumers listed in Exhibit A, which shall be payable at the last address on file with Freedom Debt within fourteen (14) days of Freedom Debt's execution of this Consent Order. Each check shall be accompanied by a letter containing the following language: "This refund check is being sent to you pursuant to a public consent order that Freedom Debt Relief, LLC entered into with the New Hampshire Banking Department. You may find a copy of this public consent order at the Department's website by searching for Case No. 10-535 in Enforcement Orders. For further questions, please contact the New Hampshire Banking Department at (603) 271-3561." Freedom Debt shall provide copies of all cancelled (cashed) checks to the Department. Should any refund check require escheatment, Freedom Debt shall contact the Department for further instructions.
2. Freedom Debt shall remit a penalty in the amount of \$54,250 for conducting debt

adjuster activity with New Hampshire consumers from at least 2009. Freedom Debt shall remit such penalty by certified or guaranteed bank funds to the “State of New Hampshire” contemporaneously with Freedom Debt’s execution of this Consent Order.

3. Failure by Freedom Debt to comply with any portion of this Consent Order shall constitute a separate and sufficient basis for administrative action, up to and including license revocation and monetary penalties.

NOW THEREFORE, the Commissioner of the New Hampshire Banking Department enters the following ORDER:

1. The sanctions set forth above are hereby entered;
2. Pursuant to RSA 399-D:25,VI, the Commissioner finds this action necessary or appropriate to the public interest or the protection of consumers and consistent with the purposes fairly intended by the policy and provisions of this title;
3. This Order fully resolves this matter and the Commissioner will not take further action against Freedom Debt for the allegations presented herein, provided that the Department may take enforcement action against Freedom Debt for any violation of this Consent Order or the matters underlying its entry, if the Commissioner determines that compliance with the terms of this Order are not being observed or if any representation made by Freedom Debt and reflected herein is subsequently discovered to be untrue in any material respect;
4. Nothing herein is intended to alter any future statutory or regulatory requirements of licensure and the allegations set forth above may be fully taken into account by the Department in connection with future examinations and enforcement actions; and

EXHIBIT A
FREEDOM DEBT RELIEF, LLC CONSENT ORDER
#10-535

Consumer 4: \$425.86	Consumer 131: \$817.47	Consumer 300: \$2,968.74
Consumer 8: \$2,745.80	Consumer 132: \$4,101.46	Consumer 301: \$354.94
Consumer 18: \$1,028.86	Consumer 134: \$2,812.16	Consumer 309: \$1,265.55
Consumer 29: \$4,369.59	Consumer 139: \$1,102.56	Consumer 313: \$2,423.90
Consumer 30: \$2,936.53	Consumer 141: \$559.48	Consumer 315: \$1,325.88
Consumer 34: \$1,791.27	Consumer 147: \$950.45	Consumer 320: \$1,041.38
Consumer 38: \$2,382.55	Consumer 151: \$304.65	Consumer 322: \$1,273.33
Consumer 40: \$2,228.84	Consumer 159: \$838.20	Consumer 327: \$2,087.54
Consumer 44: \$222.36	Consumer 165: \$2,204.26	Consumer 331: \$1,850.20
Consumer 49: \$1,657.90	Consumer 169: \$241.19	Consumer 333: \$298.48
Consumer 55: \$1,525.50	Consumer 170: \$1,289.02	Consumer 344: \$187.28
Consumer 56: \$2,367.88	Consumer 174: \$761.62	Consumer 350: \$1,016.10
Consumer 63: \$5,551.18	Consumer 176: \$2,336.62	Consumer 351: \$1,110.67
Consumer 64: \$10,006.45	Consumer 177: \$2,285.60	Consumer 352: \$1,431.80
Consumer 66: \$1,113.58	Consumer 186: \$1,359.82	Consumer 354: \$333.34
Consumer 72: \$401.79	Consumer 191: \$823.32	Consumer 361: \$1,529.86
Consumer 75: \$577.02	Consumer 209: \$537.17	Consumer 363: \$844.89
Consumer 76: \$20.00	Consumer 211: \$1,250.69	Consumer 368: \$239.63
Consumer 77: \$445.40	Consumer 213: \$572.97	Consumer 369: \$658.44
Consumer 81: \$191.79	Consumer 214: \$342.78	Consumer 370: \$509.98
Consumer 87: \$2,535.12	Consumer 223: \$1,519.52	Consumer 371: \$842.92
Consumer 88: \$1,005.93	Consumer 228: \$2,094.16	Consumer 378: \$439.10
Consumer 90: \$2,165.32	Consumer 238: \$960.19	Consumer 379: \$287.28
Consumer 92: \$1,197.84	Consumer 240: \$452.19	Consumer 386: \$201.69
Consumer 96: \$4,052.52	Consumer 258: \$355.06	Consumer 396: \$383.50
Consumer 101: \$297.83	Consumer 260: \$864.00	Consumer 399: \$1,286.98
Consumer 105: \$2,481.75	Consumer 274: \$778.78	Consumer 410: \$1,512.77
Consumer 106: \$809.34	Consumer 279: \$770.28	Consumer 411: \$1,428.61
Consumer 118: \$616.32	Consumer 280: \$166.67	Consumer 414: \$893.30
Consumer 119: \$953.31	Consumer 282: \$998.43	Consumer 427: \$724.72
Consumer 124: \$1,035.36	Consumer 294: \$1,036.95	Consumer 431: \$822.91
Consumer 126: \$416.60	Consumer 295: \$1,387.96	Consumer 434: \$1,717.20
Consumer 129: \$2,675.91	Consumer 296: \$1,201.66	