



FILED

DEC 27 2023

INSURANCE REGULATION
Docketed by: CDS

OFFICE OF INSURANCE REGULATION

MICHAEL YAWORSKY
COMMISSIONER

IN THE MATTER OF:

CASE NO.: 319785-23-CO

CLIENT DIRECT FINANCE, LLC
_____ /

CONSENT ORDER

THIS CAUSE came on for consideration as the result of CLIENT DIRECT FINANCE, LLCs (“CLIENT DIRECT”) violation of one or more provisions of the Florida Insurance Code as outlined in their 2023 Market Conduct Examination conducted by the FLORIDA OFFICE OF INSURANCE REGULATION (“OFFICE”). Following a complete review of the entire record, and upon consideration thereof, and being otherwise fully advised in the premises, the OFFICE hereby finds as follows:

1. The OFFICE has jurisdiction over the subject matter and the parties herein. CLIENT DIRECT is a premium finance company authorized to transact business in Florida and subject to regulation by the OFFICE, pursuant to the Florida Insurance Code.

2. On or about September 5, 2023, the OFFICE conducted a market conduct examination of CLIENT DIRECT.

3. The OFFICE documented violations of the Florida Insurance Code by CLIENT DIRECT for use of premium finance agreement forms or related forms not approved by the OFFICE (Section 627.838(1), Florida Statutes).

4. Section 627.838(1), Florida Statutes, provides that no premium finance agreement form or related form shall be used in this state by a premium finance company unless it has been filed with and approved by the OFFICE.

5. In two (2) instances, the OFFICE documented that CLIENT DIRECT issued premium finance agreement forms that had not been approved by the OFFICE at the time of the examination.

6. Section 627.832(1)(b), Florida Statutes, provides that the OFFICE may deny, suspend, revoke, or refuse to renew any license if it finds that the licensee has violated any provision of Chapter 627, Part XV, or any rule of the Commission.

7. Section 627.833, Florida Statutes, provides that if the OFFICE finds that one or more grounds exist for the discretionary revocation or suspension of a license issued under Chapter 627, Florida Statutes, the OFFICE may, in lieu of such revocation or suspension, impose a fine upon the premium finance company.

8. The OFFICE finds that CLIENT DIRECT has violated Section 627.838(1), Florida Statutes.

9. CLIENT DIRECT agrees that within 10 days of the execution of this Consent Order, CLIENT DIRECT shall pay an administrative fine in the amount of \$200.00 U.S. Dollars ("USD") to the OFFICE. CLIENT DIRECT shall send its payment to the address reflected on the invoice attached hereto as "Exhibit A".

10. Any deadlines, reporting requirements, other provisions, or requirements set forth in this Consent Order may be altered or terminated by written approval of the OFFICE. Such approval must be requested in writing prior to any proposed deviation from the terms of this Consent Order.

11. CLIENT DIRECT agrees that, upon execution of this Consent Order, failure to adhere to one or more of the terms and conditions contained herein may result, without further proceedings, in the OFFICE suspending, revoking, or taking other administrative action as it deems appropriate upon CLIENT DIRECT's license in this state in accordance with Sections 120.569(2)(n) and 120.60(6), Florida Statutes.

12. CLIENT DIRECT additionally agrees that, upon execution of this Consent Order, failure to adhere to one or more of the terms and conditions contained herein may subject CLIENT DIRECT to such administrative action as the OFFICE deems appropriate, as specifically authorized by law.

13. CLIENT DIRECT additionally agrees that any future violations of the statutes or rules named herein may be deemed willful, subjecting CLIENT DIRECT to penalties as the OFFICE deems appropriate.

14. CLIENT DIRECT expressly waives a hearing in this matter, the making of findings of fact and conclusions of law by the OFFICE, and all further and other proceedings herein to which it may be entitled by law or rules of the OFFICE. CLIENT DIRECT hereby knowingly and voluntarily waives all rights to challenge or to contest this Consent Order in any forum available to it, now or in the future, including the right to any administrative proceeding, state or federal court action, or any appeal.

15. Except as noted above, each party to this action shall bear its own costs.

16. The parties agree that this Consent Order shall be deemed to be executed when the OFFICE has signed and docketed a copy of this Consent Order bearing the notarized signature of the authorized representative of CLIENT DIRECT.

WHEREFORE, the agreement between CLIENT DIRECT FINANCE, LLC, and the FLORIDA OFFICE OF INSURANCE REGULATION, the terms and conditions of which are set forth above, is APPROVED.

All terms and conditions contained herein are hereby ORDERED.

DONE AND ORDERED this 27th day of December, 2023.



Michael Yaworsky

Michael Yaworsky, Commissioner
Office of Insurance Regulation

By execution hereof, CLIENT DIRECT FINANCE, LLC, consents to entry of this Consent Order, agrees without reservation to all the above terms and conditions, and shall be bound by all provisions herein. The undersigned represents that they have the authority to bind CLIENT DIRECT FINANCE, LLC, to the terms and conditions of this Consent Order.

CLIENT DIRECT FINANCE, LLC

By: [Signature]

[Corporate Seal]

Print Name: JOHN A. FOLINO

Title: MANAGING MEMBER

Date: 12/21/2023

STATE OF PENNSYLVANIA

COUNTY OF ALLEGHENY

The foregoing instrument was acknowledged before me by means of physical presence

or online notarization, this 21st day of December 2023, by JOHN A FOLINO
(name of person)

as MANAGING MEMBER for CLIENT DIRECT FINANCE LLC.

(type of authority; e.g., officer, trustee, attorney-in-fact)

(company name)

[Signature]
(Signature of the Notary)

GLORIA J FRITZ

(Print, Type or Stamp Commissioned Name of Notary)

Personally Known _____ OR Produced Identification

Type of Identification Produced PA DRIVERS LICENSE

My Commission Expires 12/08/2025

Commonwealth of Pennsylvania - Notary Seal
Gloria J. Fritz, Notary Public
Allegheny County
My commission expires December 8, 2025
Commission number 1054158
Member, Pennsylvania Association of Notaries

COPIES FURNISHED TO:

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