

**UNITED STATES OF AMERICA**  
**CONSUMER FINANCIAL PROTECTION BUREAU**

**File No. 2017-CFPB-0013**

**STIPULATION AND CONSENT  
TO THE ISSUANCE OF  
A CONSENT ORDER**

**In the matter of:**

SECURITY NATIONAL AUTOMOTIVE  
ACCEPTANCE COMPANY, LLC

The Consumer Financial Protection Bureau (Bureau) intends to initiate an administrative proceeding against Security National Automotive Acceptance Company, LLC (SNAAC), under 12 U.S.C. §§ 5563 and 5565, for its violation of an administrative consent order issued against SNAAC on October 28, 2015 (2015 Consent Order, attached as Exhibit A to the Consent Order attached hereto), in violation of § 1036(a)(1)(A) of the Consumer Financial Protection Act of 2010 (CFPA). *See* 12 U.S.C. §§ 5481(14); 5536(a)(1)(A).

SNAAC, in the interest of compliance and resolution of the matter and without admitting or denying any wrongdoing, consents to the issuance of a Consent Order substantially in the form of the one to which this Stipulation and Consent to the Issuance of a Consent Order is attached (Consent Order), and which is incorporated by reference.

In consideration of the above premises, SNAAC agrees to the following:

**Jurisdiction**

1. The Bureau has jurisdiction over this matter under §§ 1053 and 1055 of the CFPA, 12 U.S.C. §§ 5563, 5565.

**Consent**

2. SNAAC agrees to the issuance of the Consent Order, without admitting or denying any of the findings of fact or conclusions of law, except that SNAAC admits the facts necessary to establish the Bureau's jurisdiction over it and the subject matter of this action.

3. SNAAC agrees that the Consent Order will be deemed an "order issued with the consent of the person concerned" under 12 U.S.C. § 5563(b)(4), and SNAAC agrees that the Order will become a final order, effective upon issuance, and will be fully enforceable by the Bureau under 12 U.S.C. §§ 5563(d)(1) and 5565.

4. SNAAC voluntarily enters into this Stipulation and Consent to the Issuance of a Consent Order.

5. The Consent Order resolves only SNAAC's potential liability for law violations that the Bureau asserted or might have asserted based on the practices described in Section V of the Consent Order, to the extent such practices occurred before the Effective Date and the Bureau knows about them as of the Effective Date. SNAAC acknowledges that no promise or representation has been made by the Bureau or any employee, agent, or representative of the Bureau, about any liability outside of this action that may have arisen or may arise from the facts underlying this action or immunity from any such liability.

6. SNAAC agrees that the facts described in Section V of the Consent Order will be taken as true and be given collateral estoppel effect, without further proof, in any proceeding before the Bureau based on the entry of the Consent Order, or in any subsequent civil litigation by the Bureau to enforce the Consent Order or its rights to any payment or monetary judgment under the Consent Order.

7. The terms and provisions of this Stipulation and the Consent Order will be binding upon, and inure to the benefit of, the parties hereto and their successors in interest.

8. SNAAC agrees that the Bureau may present the Consent Order to the Bureau Director for signature and entry without further notice.

### **Waivers**

9. SNAAC, by consenting to this Stipulation, waives:
- a. any right to service of the Consent Order, and agrees that issuance of the Consent Order will constitute notice to SNAAC of its terms and conditions;
  - b. any objection to the jurisdiction of the Bureau, including without limitation under § 1053 of the CFPA, 12 U.S.C. § 5563;
  - c. the rights to all hearings under the statutory provisions under which the proceeding is to be or has been instituted; the filing of proposed findings of fact and conclusions of law; proceedings before, and a recommended decision by, a hearing officer; all post-hearing procedures; and any other procedural right available under § 1053 of the CFPA, 12 U.S.C. § 5563, or 12 CFR Part 1081;
  - d. the right to seek any administrative or judicial review of the Consent Order;

- e. any claim for fees, costs, or expenses against the Bureau, or any of its agents or employees, and any other governmental entity, related in any way to this enforcement matter or the Consent Order, whether arising under common law or under the terms of any statute, including but not limited to the Equal Access to Justice Act and the Small Business Regulatory Enforcement Fairness Act of 1996; for these purposes, SNAAC agrees that it is not the prevailing party in this action because the parties have reached a good-faith settlement;
- f. any other right to challenge or contest the validity of the Consent Order;
- g. such provisions of the Bureau's rules or other requirements of law as may be construed to prevent any Bureau employee from participating in the preparation of, or advising the Director as to, any order, opinion, finding of fact, or conclusion of law to be entered in connection with this Stipulation or the Consent Order; and
- h. any right to claim bias or prejudgment by the Director based on the consideration of or discussions concerning settlement of all or any part of the proceeding.

SECURITY NATIONAL AUTOMOTIVE ACCEPTANCE COMPANY, LLC, BY:



Grant Skeens

CEO, Security National Automotive Acceptance Company, LLC

4/20/17

Date

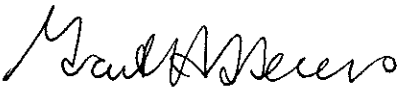
The undersigned directors of Security National Automotive Acceptance Company, LLC each acknowledges having read this Stipulation and the Consent Order, and approves of Security National Automotive Acceptance Company, LLC entering into this Stipulation.

\_\_\_\_\_  
Vincent Caruso Date  
Director, Security National Automotive Acceptance Company, LLC

\_\_\_\_\_  
David King Date  
Director, Security National Automotive Acceptance Company, LLC

\_\_\_\_\_  
Hank Reeves Date  
Director, Security National Automotive Acceptance Company, LLC

\_\_\_\_\_  
Dominick Ruggiero Date  
Director, Security National Automotive Acceptance Company, LLC

\_\_\_\_\_  
Grant Skeens Date  
Director, Security National Automotive Acceptance Company, LLC

4/20/17

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\_\_\_\_\_  
Vincent Caruso  
Director, Security National Automotive Acceptance Company, LLC

4-20-17  
\_\_\_\_\_  
Date

\_\_\_\_\_  
David King  
Director, Security National Automotive Acceptance Company, LLC

\_\_\_\_\_  
Date

\_\_\_\_\_  
Hank Reeves  
Director, Security National Automotive Acceptance Company, LLC

\_\_\_\_\_  
Date

\_\_\_\_\_  
Dominick Ruggiero  
Director, Security National Automotive Acceptance Company, LLC

\_\_\_\_\_  
Date

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Grant Skeens  
Director, Security National Automotive Acceptance Company, LLC

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Date

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\_\_\_\_\_  
Vincent Caruso  
Director, Security National Automotive Acceptance Company, LLC

\_\_\_\_\_  
Date



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April 19, 2017

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David King  
Director, Security National Automotive Acceptance Company, LLC

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Date

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Hank Reeves  
Director, Security National Automotive Acceptance Company, LLC

\_\_\_\_\_  
Date

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Dominick Ruggiero  
Director, Security National Automotive Acceptance Company, LLC

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Director, Security National Automotive Acceptance Company, LLC

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Vincent Caruso  
Director, Security National Automotive Acceptance Company, LLC

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Date

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David King  
Director, Security National Automotive Acceptance Company, LLC

\_\_\_\_\_  
Date



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April 21, 2017

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Hank Reeves  
Director, Security National Automotive Acceptance Company, LLC

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Date

\_\_\_\_\_  
Dominick Ruggiero  
Director, Security National Automotive Acceptance Company, LLC

\_\_\_\_\_  
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Grant Skeens  
Director, Security National Automotive Acceptance Company, LLC

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Vincent Caruso  
Director, Security National Automotive Acceptance Company, LLC

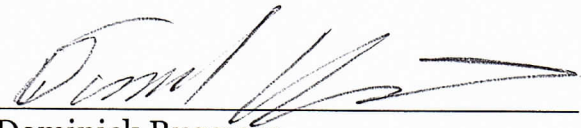
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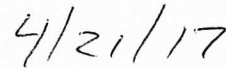
\_\_\_\_\_  
David King  
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