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**IN THE MATTER OF:** \*  
\*  
**GRANDER MORTGAGE** \*  
**CAPITAL, LLC** \*  
**NMLS # 1065200** \*  
\*  
**(“GMC”)** \*  
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**CONSENT ORDER**  
  
**AND**  
  
**ORDER TERMINATING  
AUTOMATIC SUSPENSION**

**WHEREAS**, the Banking Commissioner (“Commissioner”) is charged with the administration of Part VII of Chapter 669, Sections 36a-715 to 36a-719l, inclusive, of the Connecticut General Statutes, “Mortgage Servicing”;

**WHEREAS**, GMC is a Delaware limited liability company that has been licensed by the Commissioner through the Nationwide Multistate Licensing System and Registry (“NMLS”) to act as mortgage servicer in Connecticut, under Part VII of Chapter 669, Sections 36a-715 *et seq.*, of the Connecticut General Statutes, since August 16, 2018;

**WHEREAS**, Section 36a-719a(d) of the Connecticut General Statutes, requires that a mortgage servicer licensee designate with NMLS a qualified individual for its main office who meets the requirements in Section 36a-719 of the Connecticut General Statutes within thirty (30) calendar days of a vacancy in the position, and provides that the Commissioner may automatically suspend a mortgage servicer license upon a failure of the licensee to designate a qualified individual who meets the requirements set forth in Section 36a-719 not later than 30 days after a vacancy in the position;

**WHEREAS**, on August 2, 2019, a deficiency was posted on to GMC’s NMLS account for failure to designate a qualified individual who meets the requirements in Section 36a-719 of the Connecticut

General Statutes within thirty (30) calendar days of a vacancy in the position;

**WHEREAS**, on January 28, 2020, GMC's mortgage servicing license was automatically suspended pursuant to Section 36a-719a(d) of the Connecticut General Statutes;

**WHEREAS**, the Commissioner believes that such allegation would support initiation of proceedings against GMC, which proceedings would constitute a "contested case" within the meaning of Section 4-166(4) of the Connecticut General Statutes. Section 4-177(c) of the Connecticut General Statutes and Section 36a-1-55(a) of the Regulations of Connecticut State Agencies provide that a contested case may be resolved by consent order, unless precluded by law;

**WHEREAS**, GMC, through its execution of this Consent Order and Order Terminating Automatic Suspension, voluntarily agrees to waive its procedural rights, including a right to a notice and an opportunity for a hearing as it pertains to the allegation set forth herein, voluntarily agrees to consent to the entry of the sanction imposed below and voluntarily waives its right to seek judicial review or otherwise challenge or contest the validity of this Consent Order and Order Terminating Automatic Suspension;

**WHEREAS**, GMC acknowledges that this Consent Order and Order Terminating Automatic Suspension is a public record and is a reportable event for purposes of NMLS, as applicable;

**AND WHEREAS**, GMC herein represents to the Commissioner that it has reviewed and updated its internal policies, procedures and controls to ensure that GMC will designate a qualified individual who meets the requirements of Section 36a-719 of the Connecticut General Statutes, pursuant to Section 36a-719a(d) of the Connecticut General Statutes, within thirty calendar days of a vacancy in the position.

## CONSENT TO ENTRY OF SANCTIONS

WHEREAS, GMC, through its execution of this Consent Order and Order Terminating Automatic Suspension, consents to the Commissioner's entry of a Consent Order and Order Terminating Automatic Suspension imposing the following sanctions:

1. No later than the date this Consent Order and Order Terminating Automatic Suspension is executed by GMC, it shall remit to the Department of Banking by wire transfer, cashier's check, certified check or money order made payable to "Treasurer, State of Connecticut", the sum of Five Hundred Dollars (\$500) as a civil penalty; and
2. No later than the date this Consent Order and Order Terminating Automatic Suspension is executed by GMC, it shall designate an individual for the qualified individual position for its main office who meets the requirements of Section 36a-719 of the Connecticut General Statutes.

## CONSENT ORDER AND ORDER TERMINATING AUTOMATIC SUSPENSION

NOW THEREFORE, the Commissioner enters the following:

1. The Sanctions set forth above be and are hereby entered;
2. Upon issuance of this Consent Order and Order Terminating Automatic Suspension by the Commissioner, this matter will be resolved and the Commissioner will not take any future enforcement action against GMC based upon the allegation contained herein; provided that issuance of this Consent Order and Order Terminating Automatic Suspension is without prejudice to the right of the Commissioner to take enforcement action against GMC based upon a violation of this Consent Order and Order Terminating Automatic Suspension or the matters underlying its entry, if the Commissioner determines that compliance with the terms herein is not being observed or if any representation made by GMC and reflected herein is subsequently discovered to be untrue;
3. GMC shall not take any action or make or permit to be made any public statement, including in regulatory filings or otherwise, denying, directly or indirectly, any allegation referenced in this Consent Order and Order Terminating Automatic Suspension or create the impression that this Consent Order and Order Terminating Automatic Suspension is without factual basis;
4. Subject to the foregoing, and so long as this Consent Order and Order Terminating Automatic Suspension is promptly disclosed by GMC and its control persons, as applicable, on NMLS, nothing in the issuance of this Consent Order and Order Terminating Automatic Suspension shall adversely affect the ability of GMC to apply for or obtain licenses or renewal licenses under Part VII of Chapter 669, Sections 36a-715 *et seq.*, of the Connecticut General Statutes, provided all applicable legal requirements for such license are satisfied and the terms of this Consent Order and Order Terminating Automatic Suspension are followed;
5. The automatic suspension of the license of Grander Mortgage Capital, LLC to act as a mortgage servicer in Connecticut, issued on January 28, 2020, is hereby **TERMINATED**;

6. This Consent Order and Order Terminating Automatic Suspension shall be binding upon GMC and its successors and assigns; and
7. This Consent Order and Order Terminating Automatic Suspension shall become final when issued.

Issued at Hartford, Connecticut  
this 9th day of December 2020.

/s/  
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Jorge L. Perez  
Banking Commissioner

I, Peter Freilinger, state on behalf of Grander Mortgage Capital, LLC that I have read the foregoing Consent Order and Order Terminating Automatic Suspension; that I know and fully understand its contents; that I am authorized to execute this Consent Order on behalf of Grander Mortgage Capital, LLC; that Grander Mortgage Capital, LLC agrees freely and without threat or coercion of any kind to comply with the sanctions entered and terms and conditions ordered herein; and that Grander Mortgage Capital, LLC voluntarily agrees to enter into this Consent Order and Order Terminating Automatic Suspension, expressly waiving the procedural rights set forth herein as to the matters described herein.

By: /s/  
Name: Peter Freilinger  
Title: CFO  
Grander Mortgage Capital, LLC

State of: Maine

County of: Cumberland

On this the 3rd day of December 2020, before me, Catherine M. Chabot, the undersigned officer, personally appeared Peter J. Freilinger, who acknowledged himself/herself to be the CFO of Grander Mortgage Capital, LLC, a limited liability company, and that he/she as such CFO, being authorized so to do, executed the foregoing instrument for the purposes therein contained, by signing the name of the limited liability company by himself/herself as Peter J. Freilinger.

In witness whereof I hereunto set my hand.

/s/  
Notary Public – Catherine Marie Chabot  
Date Commission Expires: 02/21/2027