
*
IN THE MATTER OF: *
*
CELEBRITY HOME LOANS, LLC *
d/b/a ECLICK LENDING *
NMLS # 227765 *
*
(“Celebrity”) *
*

CONSENT ORDER

WHEREAS, the Banking Commissioner (“Commissioner”) is charged with the administration of Part I of Chapter 668, Sections 36a-485 to 36a-534b, inclusive, of the Connecticut General Statutes, “Mortgage Lenders, Correspondent Lenders, Brokers and Loan Originators”;

WHEREAS, Celebrity is an Illinois limited liability company with a main office at One Mid America Plaza, Suite 800, Oakbrook Terrace, Illinois (“Main Office”), and a branch office at 11715 Administration Dr., Suite 102, St. Louis, Missouri, Branch ID # 2002262 (“Branch Office”);

WHEREAS, Celebrity has been licensed by the Commissioner through the Nationwide Multistate Licensing System and Registry (“NMLS”) to engage in the business of a mortgage lender in Connecticut from its Main Office since August 12, 2021, and its Branch Office since October 21, 2021;

WHEREAS, Section 36a-490(b)(2) of the Connecticut General Statutes requires that a mortgage lender licensee file with the NMLS a change of its fictitious name at least thirty (30) calendar days prior to such change, and provide directly to the Commissioner a bond rider or endorsement, or addendum, as applicable, to the surety bond on file with the Commissioner that reflects the new name of the company;

WHEREAS, Celebrity failed to file with NMLS a change of its fictitious name, namely the addition of its trade name “eClick Lending”, at least thirty (30) calendar days prior to such change and

failed to provide a bond rider or endorsement or addendum, as applicable, to the surety bond on file with the Commissioner;

WHEREAS, Section 36a-492 of the Connecticut General Statutes requires that a mortgage lender licensee maintain a bond, covering its main office and any branch office, that runs concurrently with the period of its license;

WHEREAS, on March 13, 2023, the Commissioner received notice from Cincinnati Insurance Company that surety bond number 6793702, issued on behalf of Celebrity with respect to its mortgage lender licenses for its Main Office and Branch Office, and surety bond number 6794473, issued on behalf of Celebrity with respect to its mortgage servicing activities, would be cancelled effective April 13, 2023;

WHEREAS, Celebrity failed to timely file with the Commissioner a letter of reinstatement of the bond, a new bond or request to surrender its licenses in Connecticut;

WHEREAS, as a result, Celebrity's licenses to act as a mortgage lender from its Main Office and Branch Office were automatically suspended on the effective date of the bond cancellation, April 13, 2023, pursuant to Section 36a-492(c) of the Connecticut General Statutes;

WHEREAS, as a result of the automatic suspension of Celebrity's mortgage lender licenses and the bond cancellation for mortgage servicing activities, Celebrity no longer qualifies for an exemption from licensing as a mortgage servicer in Connecticut pursuant to Section 36a-718(b) of the Connecticut General Statutes;

WHEREAS, the Commissioner believes that such allegations would support initiation of proceedings against Celebrity including, without limitation, proceedings to issue an order revoking Celebrity's license to engage in the business of a mortgage lender in Connecticut from its Main Office and Branch Office pursuant to Sections 36a-492(c), 36a-494(a)(1) and 36a-494(a)(1)(C) of the Connecticut General Statutes and subsections (a) and (b) of Section 36a-51 of the Connecticut General Statutes, to issue an order to cease and desist pursuant to Sections 36a-494(b) and 36a-52(a) of the Connecticut General Statutes, and an order to impose a civil penalty of up to One Hundred Thousand

Dollars (\$100,000) per violation pursuant to Sections 36a-494(b) and 36a-50(a) of the Connecticut General Statutes;

WHEREAS, initiation of such enforcement 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, the Commissioner and Celebrity acknowledge the possible consequences of formal administrative proceedings, and Celebrity voluntarily agrees to consent to the entry of the sanctions without admitting or denying any allegation set forth herein and solely for the purpose of obviating the need for further formal administrative proceedings concerning the allegations contained herein;

WHEREAS, the Commissioner and Celebrity now desire to resolve the matters set forth herein;

WHEREAS, Celebrity specifically assures the Commissioner that the violations alleged herein shall not occur in the future;

WHEREAS, Celebrity acknowledges that it has had the opportunity to consult with and be represented by independent counsel in negotiating and reviewing this Consent Order and executes this Consent Order freely;

WHEREAS, Celebrity acknowledges that this Consent Order is a public record and is a reportable event for purposes of the regulatory disclosure questions on NMLS, as applicable;

WHEREAS, Celebrity represents that it has ceased mortgage lending activities in Connecticut and is no longer acting as a mortgage servicer, directly or indirectly, in Connecticut, and has requested surrender of its licenses to act as a mortgage lender from its Main Office and Branch Office;

WHEREAS, Section 36a-51(c)(1) of the Connecticut General Statutes provides, in relevant part, that “[a]ny licensee may surrender any license issued by the commissioner under any provision of the general statutes by surrendering the license to the commissioner in person or by registered or certified mail, provided, in the case of a license issued through the system, as defined in section 36a-2, such

surrender shall be initiated by filing a request to surrender on the system. No surrender on the system shall be effective until the request to surrender is accepted by the commissioner”;

AND WHEREAS, Celebrity, through its execution of this Consent Order, voluntarily agrees to waive its procedural rights, including a right to a notice and an opportunity for a hearing as it pertains to the allegations 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.

CONSENT TO ENTRY OF SANCTION

WHEREAS, Celebrity, through its execution of this Consent Order, consents to the Commissioner’s entry of a Consent Order imposing the following sanction:

No later than the date this Consent Order is executed by Celebrity, it shall remit to the Department of Banking by electronic funds 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.

CONSENT ORDER

NOW THEREFORE, the Commissioner enters the following:

1. The Sanction set forth above be and is hereby entered;
2. Upon issuance of this Consent Order by the Commissioner, the Commissioner will accept the surrender request and the surrender of the licenses to engage in the business of a mortgage lender from the Main Office and Branch Office shall become effective;
3. Upon issuance of this Consent Order by the Commissioner, this matter will be resolved and the Commissioner will not take any future enforcement action against Celebrity based upon the allegations contained herein; provided that issuance of this Consent Order is without prejudice to the right of the Commissioner to take enforcement action against Celebrity based upon a violation of this Consent Order 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 Celebrity and reflected herein is subsequently discovered to be untrue;
4. Celebrity shall not take any action or make or permit to be made any public statement, including in regulatory filings, any proceeding in any forum or otherwise, denying, directly or indirectly, any allegation referenced in this Consent Order or create the impression that this Consent Order is without factual basis. Except as specifically provided herein, Celebrity shall

not take any position in any proceeding brought by or on behalf of the Commissioner, or to which the Commissioner is a party, that is inconsistent with any part of this Consent Order. Nothing in this provision affects Celebrity's (i) testimonial obligations, or (ii) right to take any legal or factual position that may contradict an allegation in this Consent Order in litigation or other legal proceedings in which the Commissioner is not a party;

5. Subject to the foregoing, and so long as this Consent Order is promptly disclosed by Celebrity and its control persons, as applicable, on NMLS, nothing in the issuance of this Consent Order shall adversely affect the ability of Celebrity to apply for or obtain licenses or renewal licenses under Part I of Chapter 668, Sections 36a-485 *et seq.*, of the Connecticut General Statutes, provided all applicable legal requirements for such license are satisfied and the terms of this Consent Order are followed;
6. This Consent Order shall be binding upon Celebrity and its successors and assigns; and
7. This Consent Order shall become final when issued.

Issued at Hartford, Connecticut
this 10th day of July 2023.

/s/

Jorge L. Perez
Banking Commissioner

I, David Robnett, state on behalf of Celebrity Home Loans, LLC d/b/a eClick Lending that I have read the foregoing Consent Order; that I know and fully understand its contents; that I am authorized to execute this Consent Order on behalf of Celebrity Home Loans, LLC d/b/a eClick Lending; that Celebrity Home Loans, LLC d/b/a eClick Lending agrees freely and without threat or coercion of any kind to comply with the sanction entered and terms and conditions ordered herein; and that Celebrity Home Loans, LLC d/b/a eClick Lending voluntarily agrees to enter into this Consent Order, expressly waiving the procedural rights set forth herein as to the matters described herein.

By: /s/ _____
Name: David Robnett
Title: CEO
Celebrity Home Loans, LLC d/b/a eClick Lending

State of: _____

County of: _____

On this the _____ day of _____ 2023, before me, _____, the undersigned officer, personally appeared _____, who acknowledged himself/herself to be the _____ of Celebrity Home Loans, LLC d/b/a eClick Lending, a member managed/manager managed limited liability company, and that he/she as such _____, 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 _____.

In witness whereof I hereunto set my hand.

Notary Public
Date Commission Expires: