WHEREAS, the Banking Commissioner ("Commissioner") is charged with the administration of Part III of Chapter 668, Sections 36a-555 to 36a-573, inclusive, of the Connecticut General Statutes, "Small Loan Lending and Related Activities," and the regulations promulgated thereunder, Sections 36a-570-1 to 36a-570-17, inclusive, of the Regulations of Connecticut State Agencies;

WHEREAS, Doc2Doc is a Georgia corporation with an address of 3343 Peachtree Rd NE, STE 145-2071, Atlanta, Georgia;

WHEREAS, Doc2Doc has never been licensed as a small loan company in Connecticut;

WHEREAS, on October 14, 2024, Doc2Doc submitted an application for a small loan company license through the Nationwide Multistate Licensing System and Registry ("NMLS");

WHEREAS, on February 4, 2025, Doc2Doc submitted a request to withdraw its application on NMLS;

WHEREAS, the Commissioner, through the Consumer Credit Division of the Department of Banking, in response to information provided by Doc2Doc with its small loan company license application, and with Doc2Doc's cooperation, conducted an investigation pursuant to Section 36a-17(a) of the Connecticut General Statutes into the activities of Doc2Doc to determine if it had violated, was

violating or was about to violate the provisions of the Connecticut General Statutes and Regulations of Connecticut State Agencies within the jurisdiction of the Commissioner;

WHEREAS, as a result of such investigation, the Commissioner alleges that from October 2023 to January 2025, Doc2Doc offered, solicited, brokered, directly or indirectly arranged, placed or found and advertised 21 small loans made by DR Bank to prospective Connecticut borrowers without first obtaining a small loan company license, in violation of Section 36a-556(a) of the Connecticut General Statutes, effective October 1, 2023;

WHEREAS, the Commissioner believes that such allegation would support initiation of enforcement proceedings against Doc2Doc, including, without limitation, proceedings to issue an order to cease and desist against Doc2Doc pursuant to Sections 36a-570(b) and 36a-52(a) of the Connecticut General Statutes and to impose a civil penalty of up to One Hundred Thousand Dollars (\$100,000) per violation upon Doc2Doc pursuant to Sections 36a-570(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 Doc2Doc acknowledge the possible consequences of formal administrative proceedings, and Doc2Doc voluntarily agrees to consent to the entry of the sanctions imposed below without admitting or denying the allegation set forth herein, and solely for the purpose of obviating the need for formal administrative proceedings concerning the allegation set forth herein;

WHEREAS, the Commissioner and Doc2Doc now desire to resolve the matters set forth herein;
WHEREAS, Doc2Doc represents that as of January 10, 2025, it has ceased small loan activity in
Connecticut and specifically assures the Commissioner that the alleged violations described herein shall not occur in the future;

WHEREAS, Doc2Doc 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, Doc2Doc 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;

AND WHEREAS, Doc2Doc, through its execution of this Consent Order, voluntarily agrees to waive its procedural rights, including a right to notice and an opportunity for a hearing as it pertains to the allegation set forth herein, and voluntarily waives its right to seek judicial review or otherwise challenge or contest the validity of this Consent Order.

CONSENT TO ENTRY OF SANCTIONS

WHEREAS, Doc2Doc, through its execution of this Consent Order, consents to the Commissioner's entry of a Consent Order imposing the following sanctions:

- 1. Doc2Doc shall cease and desist from violating Section 36a-556(a) of the Connecticut General Statutes, including, but not limited to, offering, soliciting, brokering, directly or indirectly arranging, placing or finding a small loan for a prospective Connecticut borrower or advertising a small loan in Connecticut, without a license;
- 2. No later than ten (10) days after the date this Consent Order is executed by Doc2Doc, 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 Ten Thousand Dollars (\$10,000) as a civil penalty; and
- 3. No later than ten (10) days after the date this Consent Order is executed by Doc2Doc, 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 Four Hundred Dollars (\$400) as payment for back licensing fees.

CONSENT ORDER

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 by the Commissioner, this matter will be resolved and the Commissioner will not take any future enforcement action against Doc2Doc based upon the allegation set forth herein; provided that issuance of this Consent Order is without prejudice to the right of the Commissioner to take enforcement action against Doc2Doc 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 Doc2Doc and reflected herein is subsequently discovered to be untrue;

- 3. Doc2Doc 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, Doc2Doc 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 Doc2Doc'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;
- 4. Subject to the foregoing, and so long as this Consent Order is promptly disclosed by Doc2Doc and its control persons on NMLS, as applicable, nothing in the issuance of this Consent Order shall adversely affect the ability of Doc2Doc to apply for or obtain an initial license or renewal licenses under Part III of Chapter 668, Sections 36a-555 *et seq.*, of the Connecticut General Statutes, provided that all applicable legal requirements for any such license are satisfied and the terms of this Consent Order are being followed;
- 5. This Consent Order shall be binding upon Doc2Doc and its successors and assigns; and
- 6. This Consent Order shall become final when issued.

<u>/s/</u>	
Jorge L. Perez	
Banking Commissioner	

Issued at Hartford, Connecticut this <u>6th</u> day of <u>June</u>, 2025.

I, Zwade Marshall, state on behalf of Doc2Doc Lending, Inc. 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 Doc2Doc Lending, Inc.; that Doc2Doc Lending, Inc. agrees freely and without threat or

coercion of any kind to comply with the sanctions entered and terms and conditions ordered herein; and

that Doc2Doc Lending, Inc. voluntarily agrees to enter into this Consent Order, expressly waiving the

procedural rights set forth herein as to the matters described herein.

<u>/s/</u> Name: Zwade Marshall

Title: CEO

Doc2Doc Lending, Inc.

State of: Georgia

County of: Coweta

On this the 28th day of May, 2025, before me, Amy L. Tatom, the undersigned officer, personally

appeared Zwade Marshall, who acknowledged himself/herself to be the CEO of Doc2Doc Lending, Inc., a

corporation, and that he/she as such CEO, being authorized so to do, executed the foregoing instrument

for the purposes therein contained, by signing the name of the corporation by himself/herself as CEO.

In witness whereof I hereunto set my hand.

Notary Public

Date Commission Expires: 08/03/2027

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