
*
IN THE MATTER OF: *
*
968 W VETERANS REALTY LLC *
NMLS # 2787360 *
*
(“Veterans Realty”) *
*

CONSENT ORDER

WHEREAS, the Banking Commissioner (“Commissioner”) is charged with the administration of Part XVI of Chapter 669, Sections 36a-861 to 36a-872, inclusive, of the Connecticut General Statutes, “Commercial Financing”, as amended;

WHEREAS, Veterans Realty is a Florida limited liability company with an office located at 7901 4th Street N, Suite 300, St. Petersburg, Florida;

WHEREAS, Veterans Realty has never been registered as a commercial financing provider in Connecticut;

WHEREAS, on January 30, 2026, Veterans Realty applied for a commercial financing provider registration in Connecticut on the Nationwide Multistate Licensing System and Registry (“NMLS”), which registration is currently pending;

WHEREAS, the Commissioner, through the Consumer Credit Division of the Department of Banking, conducted an investigation pursuant to Section 36a-17(a) of the Connecticut General Statutes into the activities of Veterans Realty to determine if it had violated, was violating or was about to violate the provisions of the Connecticut General Statutes within the jurisdiction of the Commissioner (“Investigation”);

WHEREAS, as a result of such Investigation, the Commissioner alleges that, between October 1, 2024 and April 10, 2026, Veterans Realty may have entered into thirty six (36) commercial financing

agreements without the required registration, in violation of Section 36a-870 of the Connecticut General Statutes, in effect at such time;

WHEREAS, the Commissioner believes that such allegation would support initiation of enforcement proceedings against Veterans Realty, including, without limitation, proceedings to issue an order to cease and desist against Veterans Realty pursuant to Section 36a-872(b) of the 2026 Supplement to the General Statutes and Section 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 Veterans Realty pursuant to Section 36a-872(a) of the Connecticut General Statutes in effect till July 1, 2025, Section 36a-872(b) of the 2026 Supplement to the General Statutes and Section 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 Veterans Realty acknowledge the possible consequences of formal administrative proceedings, and Veterans Realty voluntarily agrees to consent to the entry of the sanctions imposed below without admitting or denying the allegations set forth herein, and solely for the purpose of obviating the need for formal administrative proceedings concerning the allegations set forth herein;

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

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

WHEREAS, Veterans Realty 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, Veterans Realty 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;

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

1. Veterans Realty shall cease and desist from engaging in commercial financing activity in Connecticut without a registration, in violation of Section 36a-870 of the 2026 Supplement to the General Statutes;
2. Veterans Realty shall employ reasonable due diligence and implement policies and procedures to reasonably confirm that the commercial financing brokers with which it does business in Connecticut are either duly registered with the Department of Banking or exempt from such registration requirements. If Veterans Realty confirms registration in good faith and the broker is later found to have misrepresented its status, Veterans Realty shall not be in violation of this provision;
3. No later than the date this Consent Order is executed by Veterans Realty, 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
4. No later than the date this Consent Order is executed by Veterans Realty, 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 Two Thousand Dollars (\$2,000) as back registration 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 Veterans Realty based upon the allegations set forth herein; provided that issuance of this Consent Order is without prejudice to the right of the Commissioner to take enforcement action against Veterans Realty

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 Veterans Realty and reflected herein is subsequently discovered to be untrue;

3. Subject to the foregoing, and so long as this Consent Order is promptly disclosed by Veterans Realty and its control persons on NMLS, as applicable, nothing in the issuance of this Consent Order shall adversely affect the ability of Veterans Realty to apply for or obtain an initial registration or renewal registrations under Part XVI of Chapter 669, Sections 36a-861 *et seq.*, of the Connecticut General Statutes, as amended, provided that all applicable legal requirements for any such registration are satisfied and the terms of this Consent Order are being followed;
4. This Consent Order shall be binding upon Veterans Realty and its successors and assigns; and
5. This Consent Order shall become final when issued.

Issued at Hartford, Connecticut
this 22nd day of June 2026.

/s/

Jorge L. Perez
Banking Commissioner

I, Daniel Lenefsky, state on behalf of 968 W VETERANS REALTY LLC, 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 968 W VETERANS REALTY LLC; that 968 W VETERANS REALTY 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 968 W VETERANS REALTY LLC 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: Daniel Lenefsky
Title: CEO
968 W VETERANS REALTY LLC

State of: New York

County of: Rockland

On this the 15 day of June 2026, before me, Katie Gilbert, the undersigned officer, personally appeared Daniel Lenefsky, who acknowledged himself/herself to be the CEO of 968 W VETERANS REALTY LLC, a member managed/manager managed limited liability company and that he/she as such Officer, 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 CEO.

In witness whereof I hereunto set my hand.

/s/
Notary Public
Date Commission Expires: 2/14/2030