
*
IN THE MATTER OF: *
*
BANKERS HEALTHCARE *
GROUP, LLC *
d/b/a BHG FINANCIAL *
NMLS # 2040829 *
*
(“BHG”) *
*

CONSENT ORDER

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,” as amended, and the regulations promulgated thereunder, Sections 36a-570-1 to 36a-570-17, inclusive, of the Regulations of Connecticut State Agencies;

WHEREAS, BHG is a Florida limited liability company with an address of 10234 W. State Road 84, Davie, Florida;

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

WHEREAS, on July 11, 2025, BHG applied for a small loan company license in Connecticut on the Nationwide Multistate Licensing System and Registry (“NMLS”), which application is currently pending;

WHEREAS, the Commissioner, through the Consumer Credit Division of the Department of Banking, as the result of information obtained during an examination of a small loan company licensee, conducted an investigation pursuant to Section 36a-17(a) of the Connecticut General Statutes into the activities of BHG 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, BHG promptly cooperated with the Division's investigation and produced all requested information and transaction records;

WHEREAS, as a result of such investigation, the Commissioner alleges that from October 2023 to April 2025, BHG without first obtaining a small loan company license, in violation of Section 36a-556(a) of the Connecticut General Statutes: (1) offered, solicited, brokered, directly or indirectly arranged, placed or found or advertised 181 small loans to be made by Pinnacle Bank to prospective Connecticut borrowers; (2) purchased or acquired approximately 181 small loans made to Connecticut borrowers by Pinnacle Bank; and (3) received payments on approximately 4 small loans acquired by BHG;

WHEREAS, BHG represents that it did not engage in any small loan activity requiring a license prior to the statutory change effective October 1, 2023, that increased the dollar threshold of small loans subject to licensure from \$15,000 to \$50,000;

WHEREAS, BHG represents that as of June 11, 2025, it has ceased alleged small loan activity requiring a license in Connecticut and specifically assures the Commissioner that the violations alleged herein shall not occur in the future;

WHEREAS, the Commissioner believes that such allegations would support initiation of enforcement proceedings against BHG, including, without limitation, proceedings to issue an order to cease and desist against BHG 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 BHG 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 BHG acknowledge the possible consequences of formal administrative proceedings, and BHG 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 BHG now desire to resolve the matters set forth herein;

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

1. BHG shall cease and desist from violating Section 36a-556(a) of the 2026 Supplement to the General Statutes, including, but not limited to, offering, soliciting, brokering, directly or indirectly arranging, placing or finding small loans for prospective Connecticut borrowers, receiving payments on small loans made to Connecticut borrower; purchasing, acquiring or receiving assignment of a small loan made to a Connecticut borrower or advertising small loans in Connecticut, without a small loan license;
2. No later than the date this Consent Order is executed by BHG, 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 the date this Consent Order is executed by BHG, 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 Eight Hundred Dollars (\$800) 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 BHG 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 BHG 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 BHG 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 BHG and its control persons on NMLS, as applicable, nothing in the issuance of this Consent Order shall adversely affect the ability of BHG 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;
4. This Consent Order shall be binding upon BHG and its successors and assigns; and
5. This Consent Order shall become final when issued.

Issued at Hartford, Connecticut
this 4th day of August 2026.

/s/

Jorge L. Perez
Banking Commissioner

I, Sarah C. Turner, state on behalf of Bankers Healthcare Group, LLC d/b/a BHG Financial 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 Bankers Healthcare Group, LLC d/b/a BHG Financial; that Bankers Healthcare Group, LLC d/b/a BHG Financial agrees freely and without threat or coercion of any kind to comply with the sanctions entered and terms and conditions ordered herein; and that Bankers Healthcare Group, LLC d/b/a BHG Financial 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: Sarah C. Turner
Title: Chief Legal Officer
Bankers Healthcare Group, LLC
d/b/a BHG Financial

State of: New York

County of: Monroe

On this the 23 day of July 2026, before me, Elizabeth Curwin, the undersigned officer, personally appeared Sarah C. Turner, who acknowledged himself/herself to be the Chief Legal Officer of Bankers Healthcare Group, LLC d/b/a BHG Financial, a member managed/manager managed limited liability company, and that he/she as such Chief Legal 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 Chief Legal Officer.

In witness whereof I hereunto set my hand.

/s/
Notary Public
Date Commission Expires: 9/29/2027
Commission Number: 02CU0013934