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**IN THE MATTER OF:** \*  
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**I.Q. DATA INTERNATIONAL, INC.** \*  
**NMLS # 971181** \*  
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**(“I.Q. Data”)** \*  
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**CONSENT ORDER**

**WHEREAS**, the Banking Commissioner (“Commissioner”) is charged with the administration of Part XII of Chapter 669, Sections 36a-800 to 36a-814, inclusive, of the Connecticut General Statutes, “Consumer Collection Agencies”, as amended, and the regulations promulgated thereunder, Sections 36a-809-6 to 36a-809-17, inclusive, of the Regulations of Connecticut State Agencies;

**WHEREAS**, I.Q. Data is a Washington corporation with a main office at 21222 30th Drive SE, Suite C210, Bothell, Washington;

**WHEREAS**, I.Q. Data has been licensed to act as a consumer collection agency in Connecticut since January 30, 2008;

**WHEREAS**, between March 7, 2024, and July 29, 2024, the Commissioner, through the Consumer Credit Division of the Department of Banking, conducted an examination into the activities of I.Q. Data, pursuant to Section 36a-17 of the Connecticut General Statutes, 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 (“Examination”);

**WHEREAS**, as a result of Examination, the Commissioner alleges that I.Q. Data (1) since May 2025 charged and collected interest from seventy-two (72) consumer debtors that was not expressly authorized by the agreement creating the debt or permitted by law in violation of Section 36a-809-12(1) of the Regulations of Connecticut State Agencies and (2) failed to timely respond to the Report of

Examination or otherwise cooperate with the Commissioner during the Examination in violation of Section 36a-17(e) of the Connecticut General Statutes;

**WHEREAS**, the Commissioner believes that such allegations would support initiation of enforcement proceedings against I.Q. Data, including, without limitation, proceedings to issue an order to make restitution against I.Q. Data pursuant to Sections 36a-804(b) and 36a-50(c) of the Connecticut General Statutes, an order to cease and desist against I.Q. Data pursuant to Sections 36a-804(b) and 36a-52(a) of the Connecticut General Statutes, and an order imposing a civil penalty of up to One Hundred Thousand Dollars (\$100,000) per violation upon I.Q. Data pursuant to Sections 36a-804(b) and 36a-50(a) of the Connecticut General Statutes;

**WHEREAS**, I.Q. Data represents to the Commissioner that any interest assessed and not collected on Connecticut accounts shall be credited to those Connecticut accounts and I.Q. Data shall refund the Connecticut debtors that paid interest and that I.Q. Data identified and produced to the Department through email on January 13, 2026;

**WHEREAS**, I.Q. Data also represents to the Commissioner that the necessary policies, procedures and controls have been implemented and shall be maintained to ensure compliance with all consumer collection agency requirements;

**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 I.Q. Data acknowledge the possible consequences of formal administrative proceedings, and I.Q. Data 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 I.Q. Data now desire to resolve the matter set forth herein;

**WHEREAS**, I.Q. Data specifically assures the Commissioner that the violations alleged herein shall not occur in the future;

**WHEREAS**, I.Q. Data acknowledges that this Consent Order is a public record and is a reportable event for purposes of the regulatory disclosure questions on the Nationwide Multistate Licensing System and Registry (“NMLS”), as applicable;

**WHEREAS**, I.Q. Data 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**, I.Q. Data, 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**, I.Q. Data, through its execution of this Consent Order, consents to the Commissioner’s entry of a Consent Order imposing the following sanctions:

1. I.Q. Data shall cease and desist from engaging in collection of any amount, including any interest, fee, charge or expense incidental to the principal obligation, that is not expressly authorized by the agreement creating the debt or permitted by law in violation of Section 36a-809-12(1) of the Regulations of Connecticut State Agencies, and failing to cooperate with the Division during examinations in violation of Section 36a-17(e) of the Connecticut General Statutes. Specifically, I.Q. Data shall respond to the Commissioner and otherwise cooperate with the Commissioner as required by Section 36a-17(e) of the Connecticut General Statutes, and shall respond to the Department no later than five (5) business days from the date of any information request from the Department;
2. No later than the date this Consent Order is executed by I.Q. Data, 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;
3. No later than sixty (60) days from the date this Consent Order is executed by I.Q. Data, it shall provide restitution to the Connecticut debtors identified by Respondent, in the amounts specified. These restitution payments shall be made by check or money order valid for ninety (90) days, and shall be mailed by registered or certified mail, return receipt requested, with proof of mailing. No later than seven (7) days after issuance of restitution payments, I.Q. Data

shall provide evidence of such payments to Swarupa Madhavan, Paralegal, Consumer Credit Division, Department of Banking, 280 Trumbull Street, 16th Floor, Hartford, Connecticut 06103, or Swarupa.Madhavan@ct.gov; and

4. Any restitution to an identified Connecticut debtor which remains uncashed after the ninety (90) days in which the issued checks or money orders are valid, shall be reduced to an additional civil penalty and, no later than sixty (60) days after expiration of the 90 days, I.Q. Data shall remit such civil penalty to the Department of Banking in one cumulative payment by electronic funds transfer, cashier's check, certified check or money order made payable to the "Treasurer, State of Connecticut".

### **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 I.Q. Data 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 I.Q. Data 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 I.Q. Data and reflected herein is subsequently discovered to be untrue;
3. I.Q. Data 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, I.Q. Data 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 I.Q. Data's (i) testimonial obligations, or (ii) right to take legal or factual positions 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 I.Q. Data and its control persons on NMLS, as applicable, nothing in the issuance of this Consent Order shall adversely affect the ability of I.Q. Data to apply for or obtain renewal licenses under Part XII of Chapter 669, Sections 36a-800 *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 I.Q. Data and its successors and assigns; and
6. This Consent Order shall become final when issued.

Issued at Hartford, Connecticut  
this 15th day of June 2026.

/s/  
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Jorge L. Perez  
Banking Commissioner

I, Michael Gulbranson, state on behalf of I.Q. DATA INTERNATIONAL, 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 I.Q. DATA INTERNATIONAL, INC.; that I.Q. DATA INTERNATIONAL, INC. agrees freely and without threat or coercion of any kind to comply with the sanctions entered and terms and conditions ordered herein; and I.Q. DATA INTERNATIONAL, INC. 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: Michael Gulbranson  
Title: VP of ARS, Leader  
I.Q. DATA INTERNATIONAL, INC.

State of: Washington

County of: King

On this the 1st day of June, 2026, before me, Shirley Hein, the undersigned officer, personally appeared Michael Gulbranson, who acknowledged himself/herself to be the VP of ARS, Leader of I.Q. DATA INTERNATIONAL, INC., a corporation, and that he/she as such VP of ARS, Leader, 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 VP of ARS, Leader.

In witness whereof I hereunto set my hand.

/s/  
Notary Public:  
Date Commission Expires:06/30/28