
 *
IN THE MATTER OF: *
 *
LEADPOINT, INC. *
d/b/a SECURE RIGHTS *
NMLS # 3175 *
 *
 (“LeadPoint”) *
 *

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”, as amended;

WHEREAS, LeadPoint is a Delaware corporation with an office located at 12121 Wilshire Blvd, Suite 810, Los Angeles, California;

WHEREAS, LeadPoint was licensed to act as a mortgage broker in Connecticut from April 15, 2005, to January 1, 2015, when LeadPoint failed to renew such license;

WHEREAS, on February 7, 2019, LeadPoint filed an application with the Commissioner on the Nationwide Multistate Licensing System and Registry (“NMLS”) to obtain a license to act as a lead generator in Connecticut, which application was classified as withdrawn as of December 17, 2019;

WHEREAS, on January 23, 2020, the Commissioner entered into a Consent Order (“2020 Consent Order”) with LeadPoint which required that LeadPoint cease and desist from engaging in lead generation activities in this state without first obtaining a license, in violation of Section 36a-486(b)(5) of the Connecticut General Statutes;

WHEREAS, LeadPoint did not obtain a license to act as a lead generator in Connecticut at any point after the 2020 Consent Order nor was LeadPoint exempt from licensure;

WHEREAS, on April 8, 2025, the Commissioner, through the Consumer Credit Division (“Division”) of the Department of Banking (“Department”), commenced an examination of a Connecticut mortgage lender licensee pursuant to Section 36a-17 of the Connecticut General Statutes (“Examination”);

WHEREAS, the licensee produced records during the course of said Examination, to the Division, listing LeadPoint as a third-party lead generator utilized by the licensee for its mortgage lending activities in this state along with documentary evidence showing the lead-generation relationship between the licensee and LeadPoint;

WHEREAS, following receipt of this information during Examination, the Commissioner, through the Division of the Department, conducted an investigation pursuant to Section 36a-17 of the Connecticut General Statutes into the activities of LeadPoint 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;

WHEREAS, as a result of such investigation, the Commissioner alleges that LeadPoint acted as a lead generator in this state without the required license from at least February 2020 to April 2025, in violation of Section 36a-486(b)(5) of the Connecticut General Statutes, in effect at such time, and the 2020 Consent Order;

WHEREAS, the Commissioner believes that such allegations would support initiation of enforcement proceedings against LeadPoint, including, without limitation, proceedings to issue an order to cease and desist against LeadPoint pursuant to Sections 36a-494(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 LeadPoint 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, both the Commissioner and LeadPoint acknowledge the possible consequences of formal administrative proceedings, and LeadPoint 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 LeadPoint now desire to resolve the matters set forth herein;

WHEREAS, LeadPoint represents that it had contracted with a third-party entity to complete the lead generator licensure process after the 2020 Consent Order, held a reasonable understanding that the lead generator license had been obtained by the third-party and was consistently operating under the good-faith belief that it had obtained and maintained the required license in Connecticut;

WHEREAS, LeadPoint represents that it does not have any active Connecticut consumer complaints and no evidence of consumer harm exists in this state;

WHEREAS, LeadPoint represents that as of December 31, 2025, it has surrendered all mortgage industry licenses and is in the process of winding down mortgage operations nationwide;

WHEREAS, LeadPoint represents that it shall not engage in any business activity that requires a mortgage lender, mortgage correspondent lender, mortgage broker, mortgage loan originator or lead generator license in this state in the future;

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

WHEREAS, LeadPoint 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, LeadPoint acknowledges that this Consent Order is a public record and is a reportable event for purposes of NMLS, as applicable;

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

1. LeadPoint shall cease and desist from engaging in lead generation activities in this state without first obtaining a license, in violation of Section 36a-486(b)(5) of the Connecticut General Statutes; and
2. No later than the date this Consent Order is executed by LeadPoint, 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 Fifty Thousand Dollars (\$50,000) as a civil penalty.

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 LeadPoint 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 LeadPoint 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 LeadPoint and reflected herein is subsequently discovered to be untrue;
3. LeadPoint shall not take any action or make or permit to be made any public statement, including in regulatory filings, any proceedings 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, LeadPoint 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 LeadPoint'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. This Consent Order shall be binding on LeadPoint and its successors and assigns; and
5. This Consent Order shall become final when issued.

Issued at Hartford, Connecticut
this 26th day of March, 2026.

/s/

Jorge L. Perez
Banking Commissioner

I, Marc Diana, state on behalf of LeadPoint, Inc. d/b/a Secure Rights, 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 LeadPoint, Inc. d/b/a Secure Rights; that LeadPoint, Inc. d/b/a Secure Rights, agrees freely and without threat or coercion of any kind to comply with the sanctions entered and terms and conditions ordered herein; and that LeadPoint, Inc. d/b/a Secure Rights, 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:
Title:
LeadPoint, Inc. d/b/a Secure Rights

State of: North Carolina

County of: Mecklenburg

On this the 20 day of March, 2026, before me, Howard Sall Kaplan, the undersigned officer, personally appeared Marc Diana, who acknowledged himself/herself to be the Chairman of LeadPoint, Inc. d/b/a Secure Rights, a corporation, and that he/she as such Chairman, 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 Marc Diana.

In witness whereof I hereunto set my hand.

/s/
Notary Public: Howard Sall Kaplan
Date Commission Expires: May 9, 2026