
*
IN THE MATTER OF: *
*
LENDAH LLC *
(NMLS # 1929464) *
*
(“Lendah”) *
*

CONSENT ORDER

WHEREAS, the Banking Commissioner (“Commissioner”) is charged with the administration of Sections 36a-671 to 36a-671f, inclusive, of Part II of Chapter 669 of the Connecticut General Statutes, “Debt Adjusters and Debt Negotiation”, as amended;

WHEREAS, Lendah is a Massachusetts limited liability company with a place of business at 500 Cummings Center, Suite 2550, Beverly, Massachusetts;

WHEREAS, Lendah has never been licensed to engage in or offer to engage in debt negotiation in Connecticut;

WHEREAS, the Commissioner, through the Consumer Credit Division of the Department of Banking (“Department”), conducted an investigation into the activities of Lendah, pursuant to the authority granted by 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 within the jurisdiction of the Commissioner (“Investigation”);

WHEREAS, as a result of such Investigation, on March 7, 2022, the Commissioner issued a Temporary Order to Cease and Desist, Notice of Intent to Issue Order to Cease and Desist, Notice of Intent to Impose Civil Penalty and Notice of Right to Hearing (collectively, “Order and Notice”) against Lendah;

WHEREAS, on October 31, 2022, the Commissioner issued an Amended and Restated Temporary Order to Cease and Desist, Order to Make Restitution, Amended and Restated Notice of Intent to Issue Order to Cease and Desist, Amended and Restated Notice of Intent to Impose Civil Penalty and Notice of Right to Hearing (“Amended Order and Notice”) to include additional allegations and an additional Respondent, Commonwealth Servicing Group, LLC, which Amended Order and Notice is incorporated by reference herein;

WHEREAS, the Commissioner alleged in the Amended Order and Notice that Lendah: (1) offered debt negotiation programs in Connecticut without obtaining the required license, in violation of Section 36a-671(b) of the Connecticut General Statutes, in effect at such time; and (2) made false or deceptive statements or representations in connection with debt negotiation or engaged in bait and switch advertising, in violation of Section 36a-671f(8) of the Connecticut General Statutes;

WHEREAS, the Commissioner asserted that the allegations in the Amended Order and Notice formed the basis to issue an order to cease and desist against Lendah pursuant to Section 36a-671a(b) of the Connecticut General Statutes and Section 36a-52(a) of the 2022 Supplement to the General Statutes, and impose a civil penalty upon Lendah pursuant to Section 36a-671a(b) of the Connecticut General Statutes and Section 36a-50(a) of the 2022 Supplement to the General Statutes;

WHEREAS, on October 31, 2022, the Amended Order and Notice was sent by certified mail, return receipt requested, to Lendah (Certified Mail No. 70191640000015844893);

WHEREAS, Lendah was timely served with the Amended Order and Notice;

WHEREAS, on November 13, 2022, Lendah filed an appearance and requested a hearing;

WHEREAS, 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 Lendah acknowledge the possible consequences of further administrative proceedings, and Lendah voluntarily agrees to consent to the entry of the sanctions imposed below without admitting or denying the allegations in the Amended Order and Notice and set

forth herein, and solely for the purpose of obviating the need for further administrative proceedings concerning the allegations in the Amended Order and Notice and set forth herein;

WHEREAS, the Commissioner and Lendah now desire to resolve the matters alleged in the Amended Order and Notice and set forth herein;

WHEREAS, Lendah specifically assures the Commissioner that the violations alleged in the Amended Order and Notice and set forth herein shall not occur in the future;

WHEREAS, Lendah represents to the Department that it has ceased all activity with Connecticut consumers and has never received any fees directly from Connecticut consumers;

WHEREAS, Lendah agrees that the Amended Order and Notice may be used in construing the Commissioner's allegations described in this Consent Order and agrees to the language of this Consent Order;

WHEREAS, Lendah 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, Lendah acknowledges that this Consent Order is a public record and is a reportable event for the purposes of the regulatory disclosure questions on the Nationwide Multistate Licensing System and Registry ("NMLS"), as applicable;

AND WHEREAS, Lendah, through its execution of this Consent Order, voluntarily agrees to waive its procedural rights, including an opportunity for a hearing as it pertains to the allegations in the Amended Order and Notice and 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, Lendah, through its execution of this Consent Order, consents to the Commissioner's entry of a Consent Order imposing the following sanctions:

1. Lendah shall not violate: (a) Section 36a-671(b) of the Connecticut General Statutes, as amended by Public Act 25-115, including offering debt negotiation programs in Connecticut without obtaining the required license; and (b) Section 36a-671f(8) of the Connecticut General Statutes, including making false or deceptive statements or representations in connection with debt negotiation or engaging in bait and switch advertising;
2. Lendah 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 Thousand Four Hundred Dollars (\$8,400) as a civil penalty payable in seven (7) installments as follows: the first payment of Two Thousand Four Hundred Dollars (\$2,400) shall be paid no later than the date this Consent Order is executed by Lendah, and six (6) monthly installments of One Thousand Dollars (\$1,000), due on the first of each month commencing on June 1, 2026 and ending on November 1, 2026; and
3. Without admitting or denying the allegations in the Amended Order and Notice and set forth herein, no later than the date this Consent Order is executed by Lendah, 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 One Thousand Six Hundred Dollars (\$1,600) 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 Lendah based upon the allegations contained in the Amended Order and Notice and set forth herein; provided that issuance of this Consent Order is without prejudice to the right of the Commissioner to take enforcement action against Lendah 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 Lendah 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 Lendah and its control persons on NMLS, as applicable, nothing in the issuance of this Consent Order shall adversely affect the ability of Lendah to apply for or obtain an initial license or renewal licenses under Sections 36a-671 to 36a-671f, inclusive, of Part II of Chapter 669 of the Connecticut General Statutes, as amended, 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 Lendah and its successors and assigns; and

5. This Consent Order shall become final when issued.

Issued at Hartford, Connecticut
this 27th day of April 2026.

/s/

Jorge L. Perez
Banking Commissioner

I, Daniel Kwiatek, state on behalf of Lendah 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 Lendah LLC; that Lendah 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 Lendah 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 Kwiatek
Title: Member
Lendah LLC

State of: Massachusetts

County of: Essex

On this the 20th day of April 2026, before me, Daniel Kwiatek, the undersigned officer, personally appeared before Gloria Pero, Notary, who acknowledged himself to be the member of Lendah LLC, a member managed/manager managed limited liability company, and that he/she as such member, 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 member.

In witness whereof I hereunto set my hand.

/s/
Notary Public Gloria Pero
Date Commission Expires: April 28, 2028