ENTERED
NOV 14 2025
vcr 9:30AM
COMMISSIONERS OFFICE

COMMONWEALTH OF KENTUCKY
PUBLIC PROTECTION CABINET
DEPARTMENT OF FINANCIAL INSTITUTIONS
ADMINISTRATIVE ACTION NO. 2025-DFI-0143

KENTUCKY DEPARTMENT OF FINANCIAL INSTITUTIONS COMPLAINANT

v.

CONSUMER REAL ESTATE FINANCE CO. RESPONDENT

AGREED ORDER

PARTIES

1. The Kentucky Department of Financial Institutions ("the Department") is responsible for administering the provisions of KRS Chapter 286, Subtitle 8, of the Kentucky Financial Services Code ("the Code"), as well as any applicable rules, regulations and orders entered pursuant to the Code.

2. Consumer Real Estate Finance, Co. is a foreign corporation transacting business in the Commonwealth of Kentucky, conducting business as a mortgage lender. The company's principal office is located at 330 SW 2nd St. #111, Fort Lauderdale, Florida 33312. The company's registered agent is listed with the Kentucky Secretary of State as Cogency Global Inc., located at 828 Lane Allen Road, Suite 219 Lexington, Kentucky 40504.

STATEMENT OF FACTS

1. On January 22, 2025, the Department conducted a routine compliance examination of Consumer Real Estate Finance Co.

2. During the examination the Department determined 88 Kentucky mortgage loans had been originated by Consumer Real Estate Finance Co. The examination covered a period of time from November 1, 2020, to October 31, 2024.

3. In reviewing the branches from which Consumer Real Estate Finance Co. transacted business regarding these loans the Department discovered that one loan on file for C. & S. Akers was originated by Logan Kadolph. The loan application was taken October 4, 2022, and closed November 7, 2022.

4. The branch location listed for Mr. Kadolph was in Kansas City, Missouri and subsequently changed to St. Charles, Missouri. The Missouri locations were not licensed as branches of Consumer Real Estate Finance Co. in the Commonwealth of Kentucky.

5. Mr. Kadolph surrendered his Kentucky Mortgage Loan Originator License on January 18, 2023.

6. In a letter dated March 24, 2025, Betty Chumbley, the compliance manager for Consumer Real Estate Finance Co., indicated that the examination findings had been reviewed and that Consumer Real Estate Finance, Co. was aware that the Akers loan was not appropriately handled and that they were aware of both the proper branching and licensing requirements of Kentucky.

7. It was determined that the business transacted on the C. & S. Akers loan was a violation of KRS 286.030(1)(a) and KRS 286.8-100(1)

STATUTORY AUTHORITY

8. KRS 286.8-030(1)(a) states:

> It is unlawful for any person to transact business in Kentucky, either directly or indirectly, as a mortgage loan company or mortgage loan broker if the mortgage loan company or mortgage loan broker is not licensed in accordance with the

> requirements of this subtitle, unless that person is exempt under KRS 286.8-020 and, if required by KRS 286.8-020(3) has timely filed a completed application for a claim of exemption, and the filed application for a claim of exemption has been approved by the commissioner.

9. KRS 286.8-100(1) states:

> No licensee shall establish or maintain a branch transacting business in Kentucky, either directly or indirectly, without: (a) Filing the application as described in KRS 286.8-032(5); and (b) Receiving prior written approval of the commissioner.

VIOLATIONS

10. In contravention of KRS 286.8-030(1)(a) and 286-100(1), Consumer Real Estate Finance Co. transacted business in Kentucky concerning a mortgage loan from a branch without applying for or receiving the required license and without receiving prior written approval of the commissioner of the Department.

AGREEMENT AND ORDER

11. To resolve this matter without litigation or other adversarial proceedings, the Department and Consumer Real Estate Finance Co. agree to compromise and settle all claims arising from the above-referenced factual background in accordance with the terms set forth herein.

12. In the interest of economically and efficiently resolving the violations described herein, it is hereby **AGREED** and **ORDERED**:

    i. Consumer Real Estate Finance Co. agrees to pay a civil fine in the amount of two thousand five hundred dollars ($2,500.00) for the violations described herein, which shall be due and payable within thirty (30) days of the entry of this Order;

    ii. All payments under this Order shall be in the form of a payment made via the NMLS system;

iii. Consumer Real Estate Finance Co. waives the right to demand a hearing at which it would be entitled to legal representation, to confront and cross-examine witnesses, and to present evidence on its behalf, or to otherwise appeal or set aside this Agreed Order;

iv. Consumer Real Estate Finance Co. consents to and acknowledges the jurisdiction of the Department over this matter and that this Agreed Order is a matter of public record and may be disseminated as such;

v. In consideration of execution of this Agreed Order, Consumer Real Estate Finance Co. for itself, and for its successors and assigns, hereby releases and forever discharges the Commonwealth of Kentucky, the Department, Office of Legal Services, and each of their members, agents, and employees in their individual capacities, from any and all manner of actions, causes of action, suits, debts, judgments, executions, claims and demands whatsoever, known and unknown, in law or equity, that Consumer Real Estate Finance Co. ever had, now has, may have or claim to have against any or all of the persons or entities named in this paragraph arising out of or by reason of this investigation, this disciplinary action, this settlement or its administration;

vi. By signing below, the parties acknowledge they have read the foregoing Agreed Order, fully understand its contents, and that they are authorized to enter into and execute this Agreed Order and legally bind their respective parties; and

vii. This Agreed Order shall constitute the Final Order in this matter.

SO ORDERED on this the 13th ~~25~~ day of November ~~September~~, 2025.

MARNI ROCK GIBSON
COMMISSIONER

Consented to:

On behalf of the Department of Financial Institutions,

This 2 ~~23~~ day of October ~~September~~, 2025.

Director, Division of Non-Depository Institutions
Department of Financial Institutions

and

On behalf of Consumer Real Estate Finance Co

This 25 day of September, 2025

Jeffrey St. Hilaire, Director
Consumer Real Estate Finance Co.

ACKNOWLEDGEMENT

STATE OF Florida)
)
COUNTY OF Broward)

On this the 25 day of September, 2025, Jeff St. Hilaire, in my presence, acknowledged him/her self to be the authorized representative of Consumer Real Estate Finance Co., and, being authorized to do so, did enter into and execute the foregoing instrument, on behalf of Consumer Real Estate Finance Co., for the purposes therein contained, acknowledging the same.

My Commission Expires: 2-2-2029

Notary Public

LISANDRA ORTEGA
Notary Public - State of Florida
Commission # HH 634325
My Comm. Expires Feb 2, 2029
Bonded through National Notary Assn.

CERTIFICATE OF SERVICE

I certify that a true and correct copy of the foregoing Agreed Order was sent on this the 14 day of November, 2025, by the method indicated below to the following:

Via certified mail, return receipt requested:

Cogency Global Inc.
CONSUMER REAL ESTATE FINANCE CO.
828 Lane Allen Road
Suite 219
Lexington, KY 40504
Registered Agent on behalf of Respondent

Via electronic delivery:

Jeffrey St. Hilaire, Director
CONSUMER REAL ESTATE FINANCE CO.
3300 SW 2nd St.
Suite 111
Ft. Lauderdale, Florida 33312
jsthilaire@societymortgage.com
Respondent

Betty Chumbley, Compliance Manager
CONSUMER REAL ESTATE FINANCE CO.
3300 SW 2nd St.
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Ft. Lauderdale, Florida 33312
bchumbley@societymortgage.com
Respondent

R. Roach,
CONSUMER REAL ESTATE FINANCE CO.
3300 SW 2nd St.
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Respondent

Eric Richardson, Staff Attorney III
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Kentucky Department of Financial Institutions

Name: Allison Reed by Victoria Ward-Bishop

Title: Executive Staff Advisor