

**BEFORE THE GEORGIA DEPARTMENT OF BANKING AND FINANCE  
STATE OF GEORGIA**

COLLEEN MARIE GILLEY f/k/a  
COLLEEN MARIE ADAMS f/k/a  
COLLEEN MARIE THOMAS,

Petitioner,

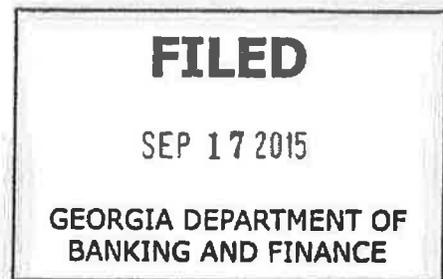
v.

GEORGIA DEPARTMENT OF BANKING  
AND FINANCE,

Respondent.

TO: Colleen Marie Gilley  
68 Jays Way  
Ringgold, Georgia 30736

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\* NMLS: 1285996  
\* GDBF: 45157  
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\* Docket No. DBF-MLO-15-0006-0291  
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**FINAL ORDER**

**A. BACKGROUND**

On August 18, 2015, Colleen Marie Gilley (“Applicant”) appeared before the undersigned Commissioner of the Georgia Department of Banking and Finance (“Department”) to contest the Order to Cease and Desist that was issued by the Department on May 29, 2015 and subsequently amended on July 20, 2015 (“Cease and Desist”).

The Cease and Desist provided that after conducting an investigation of the Applicant’s application for a mortgage loan originator’s license, the Department determined that the Applicant violated O.C.G.A. § 7-1-1013(11). The basis for the Department’s determination was its conclusion that the Applicant had made false statements or material misrepresentations to the Department or the Nationwide Mortgage Licensing System and Registry (“NMLSR”) on her mortgage loan originator application and had withheld evidence in connection with the Department’s investigation of her mortgage loan originator application.

In response to the Cease and Desist, Applicant requested a hearing pursuant to O.C.G.A. § 7-1-1018. Pursuant to notice, a hearing was scheduled for July 21, 2015. At the request of the Applicant, the hearing was continued and rescheduled for August 18, 2015 at 9:30 a.m. Applicant represented herself at the hearing while the Department was represented by Elizabeth Harris, Attorney.

Melinda Kinnard, an employee in the Non-Depository Financial Institutions Division, provided testimony at the hearing regarding the investigation of the Applicant's mortgage loan originator application. Ms. Kinnard testified that she is responsible for the review of mortgage loan originator applications and whether the applications should be recommended for approval. In reviewing mortgage loan originator applications, Ms. Kinnard testified that the Department reviews the credit qualifications, criminal background history, and general character and fitness of all mortgage loan originator applicants. According to the witness, the Department reviews the criminal background history of all applicants because the Georgia Residential Mortgage Act prohibits the licensure of felons. The witness stated that all applicants must go on the NMLSR website and file an application for licensure as well as submit required documentation. Ms. Kinnard testified that the Department relied on information supplied by the Applicant, which included the application and supporting documentation, as well as information in its files, including a certified copy of a previous first offender plea by Applicant, in reaching the conclusion to issue the Cease and Desist to Applicant. Ms. Kinnard testified that the Applicant did not disclose any previous criminal history on her application; however, the Department had received information indicating that Applicant might have a criminal history and requested clarification from Applicant. The witness stated that in response to inquiries from the Department on this topic, the Applicant provided the Department with documents indicating that she did not have a criminal history. Ms. Kinnard also testified that, although a required field, the Applicant failed to list any aliases on her mortgage loan originator application. However, Ms. Kinnard testified that Applicant had previously pled guilty and been sentenced as a first offender under an alias, Colleen Adams.

After Ms. Kinnard's testimony, Fernando Ornelas, Non-Depository Financial Institutions Senior Mortgage Examiner, provided further testimony at the hearing regarding the examination of the Applicant's mortgage loan originator application. Mr. Ornelas testified that he conducted an examination and discovered that the Applicant was the subject of an order of prohibition issued by the Office of the Comptroller of the Currency ("OCC"). The witness testified that this administrative order was not disclosed by Applicant. Mr. Ornelas further testified that during the course of his investigation he obtained a memo indicating that the Applicant had been previously terminated by SunTrust Bank for falsifying a credit report. Although this would have been responsive to a question on the application, the Applicant did not disclose this fact on her application.

To support the decision to issue the Cease and Desist to Applicant, the Department tendered into evidence: (R1) mortgage loan originator application for Collen M. Gilley dated February 5, 2015; (R2) e-mails between Applicant and the Department regarding her criminal history; (R3) correspondence provided to the Department by Applicant indicating that, according to the Bartow County Sheriff's Office and the City of Cartersville Police Department, "Collen M. Gilley" did not have a criminal record; (R4) certified copy of records related to the criminal proceeding brought against "Collen Marie Adams" and the final disposition indicating that Applicant was sentenced as a first offender for committing forgery; (R5) Order of Prohibition and Final Decision and Order

issued by the OCC against Applicant and dated November 14, 2012 and other related pleadings; (R6) SunTrust Bank internal memorandum dated May 24, 2004, regarding the termination of Applicant;<sup>1</sup> and (R7) Amended Order to Cease and Desist issued to Applicant and dated July 20, 2015.

After the Department rested its case, Applicant presented testimony on her behalf. Applicant testified that the mortgage loan originator application was submitted on her behalf by Tamara Hartley, a co-worker at Churchill Mortgage Corporation, and that she did not thoroughly review the application prior to signing the attestation. The witness testified that she informed Ms. Hartley about her various aliases but that the information was not included by Ms. Hartley on her mortgage loan originator application. Applicant stated that her background checked pulled by Churchill Mortgage Corporation further establishes that Ms. Hartley should have known about her aliases and listed them on the application.

Applicant testified that she was responding truthfully on the application when she indicated that she had not pled guilty to a felony. Applicant stated she was charged with three counts of theft by taking and one count of forgery in 2005. The witness testified that although she did not commit a crime, she did not have \$25,000.00 to pay a lawyer to defend her against the charges. The witness also stated that her attorney informed her that a guilty plea under first offender would not be considered a plea of guilt under the Supreme Court's decision in *North Carolina v. Alford*. Applicant testified that she pled guilty and was sentenced as a first offender in 2007. The witness stated that she was placed on ten years of probation but was informed that she could be released from probation after five years upon filing a petition. Applicant testified that in 2012, she requested that her lawyer file a petition to terminate her probation and to discharge her first offender status. The witness testified that she was informed that everything would be taken care of and she did not follow up to ensure that her discharge had been entered as she had just given birth to her son. Applicant testified that she returned to the workforce in January of 2015 at Churchill Mortgage Corporation, a licensed mortgage lender. In April of 2015, the State of Tennessee issued an emergency Cease and Desist Order to her. The witness stated that Churchill Mortgage Corporation fired her on April 28, 2015 and, the following day, she reached out to her lawyer and probation officer to determine her first offender status. The witness testified that her probation officer informed her that the documentation had not been properly submitted in 2012 and, as a result, her first offender status had not been terminated. Upon discovering this, the Applicant immediately took steps to have her probation terminated and her first offender status discharged. Applicant also testified that she discussed the terms of O.C.G.A. § 7-1-1004(h) – the felony conviction statute – with her attorney and he advised her that she was not eligible for licensure under the terms of the statute. Based on the fact that she

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<sup>1</sup> Applicant objected to the admissibility of R6 on the basis that her termination from SunTrust Bank was not relevant. However, this objection is invalid as the application expressly inquired if Applicant had ever been terminated based on an allegation of fraud and the Cease and Desist expressly identified this misrepresentation as a ground to support the proposed action. (R1, p. 9; R7).

was ineligible for licensure, the witness stated that she withdrew her pending mortgage loan originator application with the Department. The witness also stated that the documentation she obtained at the request of the Department after her application had been filed, confirmed her belief that she did not have a record. Applicant testified that the documentation from Bartow County and the City of Cartersville indicated that she did not have a record.

Applicant testified that she attended the hearing in *In re Colleen Adams*, Case No. OCC AA-ED-10-12 but that she never received the Order of Prohibition or the Final Decision and Order. The witness stated that she knew that there had to be a disposition in the case but that she never followed up to find out the outcome as this matter was resolved shortly after her son was born.

Applicant testified that she was not terminated from SunTrust Bank. The witness acknowledged that she applied for a loan at SunTrust Bank while an employee but, consistent with the policies of SunTrust Bank, she had nothing to do with the processing of the loan after she applied. The witness stated that the processor handled the entire application. After applying for the loan, Applicant testified that she informed SunTrust Bank that she was going to work at another bank and, in response, SunTrust Bank placed her on administrative leave. The witness testified that she was never informed that SunTrust Bank suspected her of falsifying documentation or that she had been terminated from SunTrust Bank.

In support of her defense, Applicant offered the following additional documentation: (P1) the background check run on Applicant by Churchill Mortgage Corporation dated January 20, 2015; (P2) Petition for Termination of Probation and Order of Termination filed on May 1, 2015; (P3) Petition for Discharge of Defendant and Order of Discharge filed on May 6, 2015; (P4) copy of O.C.G.A. § 7-1-1004 with notations purportedly made by her attorney; and (P5) notice of Applicant's termination from Churchill Mortgage Corporation due to the administrative order issued by the State of Tennessee.

On cross-examination, Applicant stated that she did not indicate that she had entered a guilty plea on her application because she understood that she pled guilty under the Supreme Court's decision in *North Carolina v. Alford*, which meant she was not guilty. Notwithstanding this understanding, Applicant acknowledged that the verdict form indicates that she had pled guilty to forgery and that she signed the document. (R4). Applicant also acknowledged that she signed the Defendant's Statement Regarding Guilty Plea ("Defendant's Statement"). (R4a). The document indicates that she pled guilty under the first offender act and that she was in fact guilty. The witness stated that this document was filled out by the Superior Court and, although she signed, she did not understand the difference. Applicant also testified that she signed the Background Check Authorization Form. (R1). The only alias listed by the Applicant on the Background Check Authorization Form was "Thomas." The Applicant stated that she only listed Thomas as an "alias" because she thought the form was requesting her maiden name. Finally, Applicant stated that she did not try to find out the disposition of the proceeding

with the OCC because the proceeding was more than seven years ago. In further support of its case, the Department offered into evidence as (R4a) the Defendant's Statement.

## B. FINDINGS OF FACT

1.

On or about February 5, 2015, an application for a mortgage loan originator's license was submitted on behalf of Applicant through the NMLSR for consideration by the Department. Applicant's application was forwarded from NMLSR to the Department for an investigation to determine Applicant's eligibility for licensure. At the time the application was submitted, Applicant was employed by Churchill Mortgage Corporation, a licensed mortgage lender.

2.

As part of the application process, the Department is required to make a determination whether the Applicant has been convicted of, or pleaded guilty or nolo contendere to, a felony. In addition, the Department is required to determine whether the Applicant demonstrated financial responsibility, character, and general fitness such as to command the confidence of the community and to warrant a determination by the Department that Applicant will operate honestly, fairly and efficiently within the dictates of the Georgia Residential Mortgage Act.

3.

Each application inquires whether the mortgage loan originator applicant has "ever been convicted of or pled guilty or nolo contendere ('no contest') in a domestic, foreign, or military court to any felony?" (R1, p.7). The Applicant responded "no" to this question.

4.

Notwithstanding Applicant's denial, Applicant, under the name of "Collen Marie Adams," pled guilty to forgery and was sentenced as a first offender on September 25, 2007. (R4). Applicant failed to disclose this fact on her application.

5.

Applicant contended that she did not disclose her previous guilty plea as it was her belief that a plea under the Supreme Court's decision in *North Carolina v. Alford* was not considered a guilty plea.

6.

Applicant's explanation for her failure to disclose the fact that she pled guilty to forgery is not credible. The Final Disposition on its face indicates that Applicant pled guilty to forgery and was sentenced as a first offender. (R4). Applicant signed the Final Disposition document. (R4). In addition to the Final Disposition, Applicant signed the Defendant's Statement. (R4a). In response to the question in the Defendant's Statement of "how do you plead to the charge, guilty or not guilty?" Applicant responded "guilty under First Off Act." (R4a, p.2). Applicant also responded in the affirmative that she was "in fact guilty." (R4a, p. 2). Although Applicant signed the Defendant's Statement, she contended that she did not understand that she was in fact pleading guilty. This contention is directly contrary to the express terms of the document in which Applicant agrees that she has "read or heard all of the above questions and answers and understands

them, and the answers shown are the ones I give, and they are true and correct.” (R4a, p.2).

7.

Applicant’s explanation for her failure to disclose her guilty plea is further undermined by Applicant’s failure to disclose her aliases in an apparent attempt to prevent the Department from uncovering her criminal background as well as previous administrative orders. The mortgage loan originator application does not list any aliases for Applicant. (R1, p.2). Applicant testified that the application was completed on her behalf by Tamara Hartley of Churchill Mortgage Corporation and that Ms. Hartley failed to include the aliases provided by Applicant in the application. Applicant testified that she signed the application without thoroughly reviewing its contents. However, the application on its face provides that Applicant “executed this application on [her] own behalf, and agree to and represent ... that the information and statements contained herein ... are current, true, accurate and complete and are made under penalty of perjury.” (R1, p.2). Further, Applicant, not Ms. Hartley, completed the Background Check Authorization Form. (R1). The Background Authorization Form did include the Applicant’s maiden name but it did not include any of her other aliases, including Colleen Adams. (R1). Applicant failed to disclose the alias that would reveal her guilty plea as well as the outstanding order from the OCC.

8.

In the course of the Department’s examination of Applicant’s mortgage loan originator application, the Department uncovered information indicating that Applicant had a criminal history. The Department repeatedly requested that Applicant obtain documentation regarding the final disposition of the charges. (R2). In response, Applicant provided documentation to the Department indicating that according to the Bartow County Sheriff’s Office and the Cartersville Police Department, “Colleen Gilley” did not have a criminal record. (R3). These results are not surprising in that Applicant pled guilty under “Colleen Adams” and the background request forms provided to the local governments only authorized a check for “Colleen Gilley.” (Compare R1 and R3). It is highly unlikely that Applicant was unaware that the Department was inquiring about her plea of guilty to forgery when it was seeking clarification regarding her criminal record. However, instead of disclosing this fact to the Department, Applicant elected to provide documentation to the Department that did not provide her complete criminal history as it excluded her aliases. Applicant knowingly attempted to conceal the fact that she pled guilty to forgery from the Department.

9.

Each mortgage loan originator application makes the following straight forward inquiry of each applicant:

- (K) Has any State or federal regulatory agency or foreign financial regulatory authority or self-regulatory (SRO) organization ever: ...
- (2) found you to have made a false statement or omission or been dishonest, unfair, or unethical? ...

(4) entered an order against you in connection with a financial services-related activity? ...

(7) barred you from association with an entity regulated by such commissions, authority, agency, or officer, or from engaging in a financial services-related business?

(8) issued a final order against you based on violations of any law or regulations that prohibit fraudulent, manipulative, or deceptive conduct?

(R1, p.8). The Applicant responded “no” to each of these questions.

10.

On November 14, 2012, an Order of Prohibition and Final Decision and Order were entered against Applicant in *In re Colleen Adams*, Case No. OCC AA-EC-10-12. (R5). The Order of Prohibition bars Applicant from “participat[ing] in any manner in the conduct of the[] affairs” of an insured depository institution. (R5). The Final Decision and Order states that Applicant “attempted to conceal the unauthorized withdrawals, falsely told bank officers that certain withdrawals were authorized, and made false statements regarding what happened to the missing cash withdrawals.” The Final Decision and Order concludes that Applicant’s “conduct demonstrated personal dishonesty and a willful, continuing disregard for the safety and soundness of the Bank.”

11.

Applicant’s justification for failing to disclose the administrative order issued by the OCC is not credible. Applicant acknowledged attending the administrative hearing but contended that she did not receive the order issued by the OCC and, therefore, was unaware of the outcome. However, one would not expect an applicant for a license to submit an application indicating that no regulatory action had been taken against the applicant when an administrative hearing had been held more than three years prior to the submission of the application without first attempting to determine the outcome of the hearing. Later on during cross-examination, Applicant testified that she did not disclose the OCC action because it occurred seven years prior to the date of her mortgage loan originator application. As a threshold matter, nothing in the application limits the scope of the regulatory history questions to seven years. (See R1, p. 8). Further, the OCC Order of Prohibition and the Final Decision and Order were entered on November 14, 2012, well within the supposed seven year time period. (R5).

12.

As with her forgery guilty plea, the administrative decision by the OCC was entered against Colleen Adams; an alias not disclosed to the Department. Presumably, Applicant believed that the Department would not discover her alias and, thus, elected to not disclose the Order of Prohibition. Applicant knowingly failed to disclose the OCC’s administrative decision.

13.

Each application inquires whether the mortgage loan originator applicant has “ever voluntarily resigned, been discharged, or permitted to resign after allegations were made that accused you of... fraud, dishonesty, theft, or the wrongful taking of property?” The Applicant responded “no” to this question.

14.

The Department introduced an internal memo from SunTrust Bank indicating that Applicant was terminated on May 24, 2004 because of concerns that she was involved in falsifying documentation related to a mortgage loan. (R6). Applicant testified that she was not terminated by SunTrust Bank but instead that she was placed on leave after she informed SunTrust Bank that she was leaving to work at another bank.

15.

Unlike Applicant's failure to disclose her guilty plea or the administrative order issued by the OCC, Applicant does dispute whether the alleged underlying event – termination over allegations of fraud or dishonesty – ever occurred. Although the contents of the internal memo certainly ring true in light of the contentions surrounding her guilty plea and the OCC administrative decision, the Department did not provide any testimony from SunTrust Bank to support this ground as a basis for the Cease and Desist. In light of the above, the Department cannot conclude that Applicant improperly failed to disclose her separation from SunTrust Bank.

16.

After discovering that Applicant had pled guilty to forgery and was sentenced as a first offender, the Department issued a notice of its intent to deny Applicant's mortgage loan originator license. Applicant withdrew her pending license application before the denial of her mortgage loan originator license became final. After the application was withdrawn, the Department issued an Order to Cease and Desist on May 29, 2015 which was subsequently amended on July 20, 2015.

### C. CONCLUSIONS OF LAW

1.

The Department is authorized to issue an order to cease and desist to a person employed by a licensee requiring that the individual "cease and desist immediately from ... unauthorized practices." O.C.G.A. § 7-1-1018(a). Pursuant to O.C.G.A. § 7-1-1013(11), it is prohibited for an individual to "[p]urposely withhold ... information requested by an examiner of the department or make false statements or material misrepresentations to the department or the [NMLS]."

2.

O.C.G.A. § 7-1-1004(d) provides in pertinent part that:

Upon receipt of an application for a mortgage loan originator license, the department shall conduct such investigation as it deems necessary to determine that the mortgage loan originator applicant:

- ...
- (2) Has not been convicted of, or pleaded guilty or nolo contendere to, a felony in a domestic, foreign, or military court; ...
  - (3) Has demonstrated financial responsibility, character, and general fitness such as to command the confidence of the community and to warrant a determination that the mortgage loan originator will operate, honestly, fairly, and efficiently within the purposes of this article.

3.

In making its assessment of the Applicant's pending application, Applicant was required to submit personnel identifying information so the Department would be able to, among other things, obtain "information related to any administrative, civil, or criminal findings by any governmental jurisdiction." O.C.G.A. § 7-1-1004(j)(2)(B).

4.

Although Applicant pled guilty to forgery under *North Carolina v. Alford*, 400 U.S. 25 (1970), this does not alter the fact that her plea is still considered a guilty plea. "An *Alford* plea is ... a guilty plea and places the defendant in the same position as if there had been a trial and conviction by a jury." *Argot v. State*, 261 Ga. App. 569, 571 (2003). Further, the fact that Applicant was sentenced as a first offender does not alter the fact that she pled guilty to a felony and is precluded from working in the mortgage industry. O.C.G.A. § 7-1-1004(h) ("a mortgage loan originator shall be deemed to have been convicted of a crime if he or she has pleaded guilty to, been found guilty of, or entered a first offender or nolo contendere plea to a felony").

5.

The Department has established that while employed by Churchill Mortgage Corporation, a licensed mortgage lender, Applicant submitted a mortgage loan originator application that contained false statements and/or material misrepresentations. Applicant knowingly failed to disclose on her mortgage loan originator application that she pled guilty to forgery. Presumably, Applicant did not disclose this fact as her guilty plea would have precluded her from obtaining a mortgage loan originator license. O.C.G.A. §§ 7-1-1004(d)(2) and (h). In addition, Applicant knowingly failed to disclose the administrative decision and order issued by the OCC. It would appear that Applicant did not disclose the OCC's administrative decision as the Final Decision and Order discusses her felony conviction, which is an automatic bar to licensure. Applicant also knowingly failed to disclose her aliases, presumably in an effort to prevent the Department from discovering the guilty plea or the administrative order as both cases were in the name of Collen Adams, an alias of Applicant. Finally, Applicant purposefully withheld information from the Department regarding her criminal history. The Department made repeated requests to Applicant related to her forgery conviction but Applicant did not provide responsive information. In fact, Applicant provided documentation from the Bartow County Sheriff's Office and the City of Cartersville Police Department in an effort to conceal the fact that Applicant had in fact previously pled guilty to forgery.

6.

The Department has not established that Applicant was terminated by an employer for fraud or dishonesty.

7.

Applicant violated O.C.G.A. § 7-1-1013(11) by making false statements and material misrepresentations to the Department or the NMLSR related to her mortgage loan originator application. These false statements and material misrepresentations more than support the issuance of an order directing Applicant to cease and desist from violating the Georgia Residential Mortgage Act.

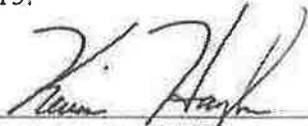
#### D. DETERMINATION

After thoughtful consideration and taking into account the foregoing Findings of Fact and Conclusions of Law, documents entered into evidence, and the testimony and credibility of the witnesses, the Department has determined that Applicant made false statements and material misrepresentations related to her mortgage loan originator application.

#### ORDER

Based on the forgoing Findings of Fact and Conclusions of Law set forth herein, the Department established that the Applicant made false statements and material misrepresentations related to the Applicant's mortgage loan originator application. Therefore, it is the FINAL ORDER of the Department that the issuance of the Amended Order to Cease and Desist dated July 20, 2015 is UPHELD, and Applicant is required to cease and desist from engaging in activities in violation of the Georgia Residential Mortgage Act.

SO ORDERED this 17<sup>th</sup> day of September, 2015.

  
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KEVIN B. HAGLER  
Commissioner  
Department of Banking and Finance



## Department of Banking and Finance

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770-986-1633

[dbf.georgia.gov](http://dbf.georgia.gov)

Nathan Deal

Governor

July 20, 2015

Kevin B. Hagler

Commissioner

### VIA CERTIFIED MAIL

Colleen Marie Gilley  
4687 Boynton Drive  
Ringgold, Georgia 30736

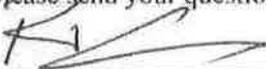
GDBF No. 45157, NMLS No. 1285996

### AMENDED ORDER TO CEASE AND DESIST

Pursuant to O.C.G.A. § 7-1-1018(a), the Georgia Department of Banking and Finance ("Department") hereby orders you, Colleen Marie Gilley, to cease and desist from engaging in activities in violation of the Georgia Residential Mortgage Act ("GRMA"), O.C.G.A. § 7-1-1000 *et seq.* Specifically, the Department has evidence that during its investigation of your application for a mortgage loan originator license, you violated O.C.G.A. 7-1-1013(11) in the following ways: (1) providing false information to the Department in your license application when asked in the disclosure questions whether you have ever been convicted of or pled guilty or nolo contendere ("no contest") in a domestic, foreign, or military court to any felony; (2) failing to disclose a known alias in your license application; (3) withholding information requested by the Department in connection with its investigation; (4) providing false information to the Department in your license application when asked in the disclosure questions whether any state or federal regulatory agency or foreign financial regulatory authority or self-regulatory organization ("SRO") has ever barred you from association with an entity regulated by such commissions, authority, agency, or officer, or from engaging in a financial services-related business; and, (5) providing false information to the Department in your license application when asked in the disclosure questions whether you have ever voluntarily resigned, been discharged, or permitted to resign after allegations were made that accused you of fraud, dishonesty, theft, or the wrongful taking of property.

Pursuant to the provisions of O.C.G.A. § 7-1-1018, you may request a hearing to contest this Order. The hearing will be held at the main office of the Department before its Commissioner. You must appear in person at the hearing. You may retain counsel of your choice and subpoena witnesses and documentary evidence.

A request for a hearing must be made in writing within twenty days of the date of this Order. Please be advised that if you do not request a hearing in writing within twenty days of the date of this Order, this Order shall become a final order. A licensed mortgage broker or lender is prohibited from employing a person with a final Order to Cease and Desist for a period of five years to perform any functions governed by the GRMA. O.C.G.A. § 7-1-1004. Additionally, a licensed mortgage broker or lender is prohibited from employing a person who has been convicted of a felony. O.C.G.A. § 7-1-1004. These restrictions in no way prohibit such persons from engaging in business with a mortgage broker or mortgage lender that is not licensed or required to be licensed by the Department. Should you have any questions concerning this matter, please send your questions by e-mail to [eharris@dbf.state.ga.us](mailto:eharris@dbf.state.ga.us).

  
Rod Carnes, CFE, Deputy Commissioner  
Georgia Department of Banking and Finance

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