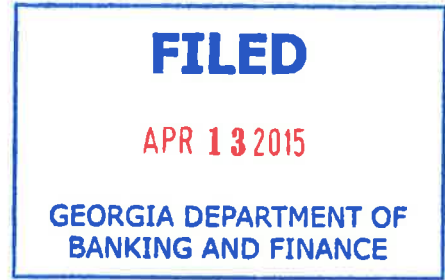


**BEFORE THE GEORGIA DEPARTMENT OF BANKING AND FINANCE
STATE OF GEORGIA**



STEPHEN MARK WILSON	Petitioner
vs.	
GEORGIA DEPARTMENT OF BANKING AND FINANCE	Respondent
CITY MORTGAGE CORPORATION aka I3LENDING	Petitioner
vs.	
GEORGIA DEPARTMENT OF BANKING AND FINANCE	Respondent
SUJAY KANTH	Petitioner
vs.	
GEORGIA DEPARTMENT OF BANKING AND FINANCE	Respondent
ESS SOLUTIONS, LLC	Petitioner
vs.	
GEORGIA DEPARTMENT OF BANKING AND FINANCE	Respondent

DOCKET NO. DBF-MBL-14-00__

CONSENT ORDER

On December 1, 2014, the Georgia Department of Banking and Finance (“Department”) issued an Amended¹ Order to Cease and Desist and a Notice of Intent to Revoke Mortgage Loan Originator’s

¹ The Department first issued an Order to Cease and Desist to Mr. Stephen Mark Wilson on August 21, 2014. This Order to Cease and Desist was rescinded, due to a typographical error, on September 2, 2014, and a second Order to Cease and Desist was issued that same day. On December 1, 2014, the Department issued an Amended Order to Cease and Desist to Stephen Mark Wilson. Any reference to the Order to Cease and Desist or the Amended Order to Cease and Desist issued to

License to Stephen Mark Wilson, mortgage loan originator's license number 40029 and Nationwide Multi-State Licensing System ("NMLS") number 144376 for violations of the Georgia Residential Mortgage Act, O.C.G.A. § 7-1-1000 *et seq.* ("GRMA"). On this same day, the Department issued an Amended² Notice of Intent to Revoke Annual License to City Mortgage Corporation aka i3Lending, Inc.,³ mortgage lender's license number 40013 and NMLS number 1020884 for violations of GRMA. The Department's action(s) were based on violations of GRMA, namely: (i.) allowing the acquisition of 10 percent or more of the voting share or ownership of a Georgia licensed entity without first filing an application with the Department and failing to deliver required information to the Department concerning the financial responsibility, background, experience, and activities of proposed directors and officers in violation of O.C.G.A. § 7-1-1008, (ii.) transacting business under a name not designated in the records of the Department, failing to notify the Department within thirty business days of a change in the ultimate equitable owner of 10 percent or more of the company, and transferring or assigning a license in violation of O.C.G.A. § 7-1-1006; (iii.) failing to notify the Department of a change in principals of the company without the proper approval of the Department, in violation of Department Rules 80-11-3-.01(24) and 80-11-3-.01(7), respectively; (iv.) transacting business with a person who is unlicensed and not exempt from licensing requirements and directly or indirectly controlling a person who violated O.C.G.A. § 7-1-1002(a) and (b), in violation of O.C.G.A. § 7-1-1002(c), employing

Stephen Mark Wilson, including hearing requests in response thereto, are synonymous with each other and incorporate all violations set forth in either administrative action.

² The Department first issued a Notice of Intent to Revoke Annual License to City Mortgage Corporation aka i3 Lending, Inc. on August 21, 2014. On December 1, 2014, the Department issued an Amended Notice of Intent to Revoke Annual License to City Mortgage Corporation aka i3 Lending, Inc. Any reference to the Notice of Intent to Revoke Annual License or the Amended Notice of Intent to Revoke Annual License issued to the company, including hearing requests in response thereto, are synonymous with each other and incorporate all violations set forth in either administrative action.

³ City Mortgage Corporation is licensed with the Department. From a review of the NMLS filings and records, it appears that City Mortgage Corporation was acquired by ESS Solutions, LLC on April 12, 2014 and changed its name to i3 Lending, Inc. on April 12, 2014. The Department has not approved, prior to the issuance of any administrative actions nor after the issuance of administrative actions, a trade name or dba for City Mortgage Corporation using i3 Lending, Inc. or any other proposed name. Therefore, the Department's records reflect that the name of the company that holds mortgage lender license number 40013 is City Mortgage Corporation.

convicted felon(s) in violation of O.C.G.A. § 7-1-1004(h); and (v.) making false statements or misrepresenting material facts in mortgage loan documents in violation of O.C.G.A. § 7-1-1013(1), (2) and (6). In addition to the violations stated above, the Department determined that Stephen Mark Wilson permitted an unlicensed person to use a licensed mortgage loan originator's license and identity in violation of Department Rule 80-11-5-.05(i), and Stephen Mark Wilson failed to continue to meet the minimum standards for the mortgage loan originator's license by failing to demonstrate character and general fitness such as to command the confidence of the community and to warrant a determination by the Department that he will operate honestly, fairly and efficiently within the purposes of the GRMA, O.C.G.A. § 7-1-1000 *et seq.* O.C.G.A. § 7-1-1004(d)(3).

On December 1, 2014, the Department issued an Amended⁴ Order to Cease and Desist to Sujay Kanth, NMLS number 1177075, and to ESS Solutions, LLC for violations of GRMA, specifically: (i) acquiring 10 percent or more of the voting shares or ownership of a Georgia licensed entity without first filing an application with the Department and failing to deliver required information to the Department concerning the financial responsibility, background, experience, and activities of proposed directors and officers of the acquiring entity, in violation of O.C.G.A. § 7-1-1008, (ii) transacting business with a person who is unlicensed and not exempt from licensing requirements and directly or indirectly controlling a person who violated O.C.G.A. § 7-1-002(a) and (b), in violation of O.C.G.A. § 7-1-1002(c); (iii.) employing convicted felon(s) in violation of O.C.G.A. § 7-1-1004(h); and (iv.) making false statements or misrepresenting material facts in mortgage loan documents in violation of O.C.G.A. § 7-1-1013(1), (2) and (6). In addition to the violations noted above, the Department also found that Sujay Kanth failed to provide sufficient documentation to verify lawful presence in the United States, in accordance with O.C.G.A. § 50-36-1(b) and O.C.G.A. § 50-36-2.

⁴ The Department first issued Orders to Cease and Desist to Mr. Sujay Kanth and ESS Solutions, LLC on August 21, 2014. On December 1, 2014, the Department issued Amended Orders to Cease and Desist to Sujay Kanth and ESS Solutions, LLC, adding additional violations. Any reference to the Orders to Cease and Desist or to the Amended Orders to Cease and Desist issued to Mr. Kanth and ESS Solutions, LLC including hearing requests in response thereto, are synonymous with each other and incorporate all violations set forth in either administrative action.

Hearings were timely requested to contest the issuance of the proposed Order to Cease and Desist and the Notice of Intent to Revoke Mortgage Loan Originator's License issued to Stephen Mark Wilson, as well as the proposed Orders to Cease and Desist issued to Sujay Kanth and to ESS Solutions. Further, a hearing was requested to contest the issuance of the Notice of Intent to Revoke Annual License issued to City Mortgage Corporation aka i3 Lending, Inc. All of the parties have reached a settlement of the issues raised by the Notice of Intent to Revoke Mortgage Loan Originator License, the Notice of Intent to Revoke Annual License, and the proposed Orders to Cease and Desist collectively and agree to a resolution of those matters in their entirety.

Accordingly, it is hereby ORDERED as follows:

1. Upon entry of this Consent Order, the mortgage lender's license for City Mortgage Corporation aka i3Lending, Inc. will be deemed surrendered. The surrender of the mortgage lender's license will be published by the Department.
2. Upon entry of this Consent Order, the mortgage loan originator's license for Stephen Mark Wilson will be deemed surrendered. Stephen Mark Wilson further agrees that he will not engage in any activity in the State of Georgia that violates the provisions of GRMA, O.C.G.A. § 7-1-1000, *et. seq.* The surrender of the mortgage loan originator's license will be published by the Department and its agent, the NMLS.
3. Stephen Mark Wilson shall be prohibited from making an application for a Georgia mortgage loan originator's license, a Georgia mortgage broker's license, or a Georgia mortgage lender's license, either in his individual capacity or as the owner or officer of a corporation, partnership, or limited liability company. Stephen Mark Wilson shall be prohibited from being employed, in any capacity, by a licensed Georgia mortgage broker or licensed Georgia mortgage lender for a period of five years. This restriction in no way prohibits Stephen Mark Wilson from engaging in business with a mortgage broker or mortgage lender that is not required to be licensed by the Department.

4. Stephen Mark Wilson shall be prohibited from directing the affairs of a Georgia mortgage broker or Georgia mortgage lender or acting as a director, officer, partner, equitable owner, or any other equivalent role for a licensed Georgia mortgage broker or Georgia mortgage lender.
5. Stephen Mark Wilson shall be prohibited from acting as a branch manager for a Georgia branch of a Georgia licensed mortgage broker or Georgia licensed mortgage lender.
6. Sujay Kanth shall be prohibited from making an application for a Georgia mortgage loan originator's license, a Georgia mortgage broker's license, or a Georgia mortgage lender's license, either in his individual capacity or as the owner or officer of a corporation, partnership, or limited liability company.
7. Sujay Kanth shall be prohibited from directing the affairs of a Georgia mortgage broker or Georgia mortgage lender or acting as a director, officer, partner, equitable owner, or any other equivalent role for a licensed Georgia mortgage broker or Georgia mortgage lender.
8. Sujay Kanth shall be prohibited from acting as a branch manager for a Georgia branch of a Georgia licensed mortgage broker or Georgia licensed mortgage lender.
9. Sujay Kanth shall be prohibited from acquiring, directly or indirectly, more than 10 percent or more of the voting shares or ownership of a Georgia licensed company for a period of five years. This provision in no way interferes with the Department's authority to investigate and approve such acquisitions.
10. City Mortgage Corporation aka i3Lending, Inc. shall pay fines in the amount of five thousand dollars (\$5,000.00) to the Department in connection with the violations for which the Amended Notice of Intent to Revoke Annual License, dated December 1, 2014, was issued. The amount shall be paid in certified funds and shall be remitted contemporaneously to the Department with the entry of this Order.

11. Stephen Mark Wilson shall pay fines in the amount of one thousand dollars (\$1,000.00) to the Department in connection with the violations for which the Amended Order to Cease and Desist and Notice of Intent to Revoke Mortgage Loan Originator's License, dated December 1, 2014, were issued. The amount shall be paid in certified funds and shall be remitted to the Department contemporaneously with the entry of this Order.
12. Stephen Mark Wilson shall contribute one thousand dollars (\$1,000.00) to the State Regulatory Registry, LLC, a wholly-owned subsidiary of the Conference of State Bank Supervisors ("CSBS") to support the NMLS, jointly sponsored by CSBS and the American Association of Residential Mortgage Regulators. This contribution shall be paid in certified funds, be made payable to the State Regulatory Registry, LLC, and shall be remitted contemporaneously with the entry of this Consent Order.
13. Sujay Kanth shall contribute one thousand dollars (\$1,000.00) to the State Regulatory Registry, LLC, a wholly-owned subsidiary of the Conference of State Bank Supervisors ("CSBS") to support the NMLS, jointly sponsored by CSBS and the American Association of Residential Mortgage Regulators. This contribution shall be paid in certified funds, be made payable to the State Regulatory Registry, LLC, and shall be remitted contemporaneously with the entry of this Consent Order.
14. Within five business days of the date of entry of this Consent Order, Stephen Mark Wilson shall update his responses to the Regulatory Action Disclosure Questions, on his MU-2 filing on the Nationwide Multi-State Licensing System and Registry to reflect the existence of this final administrative action against him and the restrictions set forth therein.
15. Within five business days of the date of entry of this Consent Order, responses to the Regulatory Action Disclosure Questions on the MU-1 filing on the Nationwide Mortgage Licensing System and Registry shall be updated to reflect the existence of this final

administrative action against City Mortgage Corporation aka i3Lending, Inc. and the restrictions set forth therein.

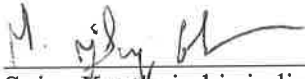
16. The Amended Order to Cease and Desist issued to ESS Solutions, LLC on December 1, 2014 shall be made final contemporaneously with the entry of this Order.
17. The request for hearings, made in response to the Orders to Cease and Desist, Notice of Intent to Revoke Mortgage Loan Originator License, and Notice of Intent to Revoke Annual License, are hereby withdrawn.
18. The Department shall rescind the Notice of Intent to Revoke Mortgage Loan Originator's License and Amended Order to Cease and Desist issued to Stephen Mark Wilson on December 1, 2014.
19. The Department shall rescind the Amended Notice of Intent to Revoke Annual License issued to City Mortgage Corporation aka i3Lending, Inc. on December 1, 2014.
20. The Department shall rescind the Amended Cease and Desist Order Issued to Sujay Kanth on December 1, 2014.
21. The terms of this Consent Order may be enforced by the Department pursuant to O.C.G.A. §§ 7-1-1017(g) and 7-1-1018(b).
22. This Consent Order shall be regarded as a public document that the Department may publish in the same manner as a final order of this agency.

SO ORDERED AND ENTERED, this 13th day of April 2015


Kevin B. Hagler
Commissioner
Georgia Department of Banking and Finance

[SIGNATURES TO FOLLOW ON NEXT PAGE]

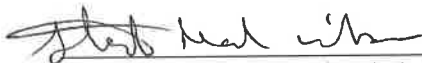
Consented to by:



Sujay Kanth, in his individual capacity and as the representative for ESS Solutions, LLC and as the Chairman of City Mortgage Corporation aka i3 Lending, Inc.
City Mortgage Corporation aka i3Lending, Inc.
379 W. Uwchlan Ave., Suite 201
Downingtown, Pennsylvania 19335



Rod Carnes, Deputy Commissioner
Department of Banking and Finance
2990 Brandywine Road, Suite 200
Atlanta, Georgia 30341



Stephen Mark Wilson, in his individual capacity and as the Executive Vice President of City Mortgage Corporation aka i3 Lending, Inc.
City Mortgage Corporation aka i3Lending, Inc.
379 W. Uwchlan Ave., Suite 201
Downingtown, Pennsylvania 19335