

**STATE OF ILLINOIS**

**DEPARTMENT OF FINANCIAL AND PROFESSIONAL REGULATION**

**DIVISION OF BANKING**

IN THE MATTER OF )  
 )  
 ) No. 2009-MBR-CD7-b &  
**STRATEGIC LENDING, INC. &** ) 2009-LO-CD-25b  
**GLENN HAYHURST** )  
Four City Place Drive, #400 )  
St. Louis, MO 63141 )

**CONSENT ORDER & SETTLEMENT OF ALL MATTERS**

The DEPARTMENT OF FINANCIAL AND PROFESSIONAL REGULATION, Division of Banking (the “Department”), STRATEGIC LENDING, INC. (“Strategic Lending”) and GLENN HAYHURST (“Hayhurst”), hereby enter into this Consent Order & Settlement of All Matters (the “Consent Order”) to resolve all issues involving Strategic Lending’s and Hayhurst’s conduct of residential mortgage licensable activities in the State of Illinois. This Consent Order is made pursuant to the Residential Mortgage License Act of 1987 (the “Act”) [205 ILCS 635] and the rules promulgated under the Act (the “Rules”) [38 Ill. Adm. Code 1050]. The Department, and Strategic Lending and Hayhurst, stipulate, agree, and admit as follows:

**STIPULATIONS AND ADMISSIONS**

The Department, Strategic Lending and Hayhurst, stipulate that the Department opened an investigation of companies and individuals engaged in co-brokering Illinois residential mortgage loans and that resulted, in part, in the Department issuing on December 4, 2009 two cease and desist orders in this matter, Order No. 2009-MBR-CD7 and Order No. 2009-LO-CD-25 (the “Orders”). Thereafter, Strategic Lending and Hayhurst timely filed for administrative hearings of the Orders and the

Department's Orders are currently under administrative appeal and there has been no final determination of facts in the administrative hearing proceedings. The Department, Strategic Lending and Hayhurst now desire to resolve all matters pertaining to the Orders. Strategic Lending and Hayhurst admit that they engaged in co-brokering of two Illinois residential mortgage loans with and based upon a solicitation from Superior Home Loans, LLC and that Strategic Lending and Hayhurst did so without intent or knowledge that such co-brokering activity was in violation of the Act and Rules. The Department stipulates that Strategic Lending's and Hayhurst's admission is consistent with the facts presented to the Department and is taken into consideration hereinafter in rescission of the Orders and mitigation of penalties through this Consent Order.

### **TERMS AND CONDITIONS**

WHEREFORE, the Department, Strategic Lending and Hayhurst agree as follows:

- I. Strategic Lending and Hayhurst agree to not conduct residential mortgage activities in the State of Illinois in the future without having an Illinois residential mortgage license and Illinois mortgage loan originator license, respectively, or being lawfully exempt from licensure under the Act and Rules. Strategic Lending and Hayhurst agree to apprise themselves fully of the Act and Rules prior to engaging in any future residential mortgage license activities in the State of Illinois.
- II. The Department rescinds the Orders and assesses a fine of \$2,000 on Strategic Lending pursuant to this Consent Order. Upon execution of this Consent Order, Strategic Lending agrees to pay the \$2,000 fine to the Department by cashier's check or money order within thirty (30) days of the effective date of this Consent Order.
- III. Strategic Lending and Hayhurst acknowledge that in the event they violate this Consent Order, the Department may take any enforcement action against Strategic Lending and Hayhurst authorized by the Act, including, but not limited to, further issuance of cease and desist orders and fines.

- IV. Strategic Lending and Hayhurst agree to withdraw their administrative hearing requests of the Orders and to not file any petition for hearing and administrative review, or judicial review of this Consent Order. Strategic Lending and Hayhurst acknowledge that they has been represented by legal counsel in negotiating this Consent Order, and Strategic Lending and Hayhurst willingly enter into this Consent Order after full review, evaluation, and consideration and with full knowledge of their rights under the Act, and the Illinois Administrative Procedure Act.
- V. The Department enters into the Consent Order for the purpose of imposing measures that are fair and equitable in the circumstances and that are consistent with the best interests of the people of the State of Illinois. This Consent Order shall be published on the Department's website.
- VI. The Consent Order shall become effective upon all the parties hereinafter designated signing and dating the Consent Order and on the date that the last of those designated for the Department sign and date the Consent Order.

The foregoing Consent Order is approved in full.

\_\_\_\_\_ date: \_\_\_\_\_  
Glenn Hayhurst, individually and for Strategic Lending, Inc.

ILLINOIS DEPARTMENT OF FINANCIAL AND PROFESSIONAL REGULATION  
BRENT E. ADAMS, SECRETARY  
DIVISION OF BANKING

\_\_\_\_\_ date: **MAY 24, 2010**  
JORGE A. SOLIS, DIRECTOR