

**STATE OF ILLINOIS**

**DEPARTMENT OF FINANCIAL AND PROFESSIONAL REGULATION**

**DIVISION OF BANKING**

IN THE MATTER OF: )  
 )  
 ) No. 2007-MBR-25-b  
**American Fidelity Financial Services, Inc.** )  
**f/k/a American Federal Financial Services, Inc.** )  
License No. MB.0004222 )  
5001 Newport Drive )  
Rolling Meadows, IL 60008 )

**CONSENT ORDER**

The Department of Financial and Professional Regulation, Division of Banking, of the State of Illinois (the “Department”) and American Fidelity Financial Services, Inc. f/k/a American Federal Financial Services, Inc. (“American Fidelity”) hereby enter into this Consent Order (the “Consent Order”) and stipulate, admit and agree to the following:

**STIPULATIONS AND ADMISSIONS**

On June 28, 2007, the Department issued Order No. 2007-MBR-25 (the “Order”) assessing a fine to American Fidelity for employing Aaron Hodor (“Hodor”) as an unregistered loan originator or solicitor and for Hodor’s improper solicitation of a residential mortgage application from a consumer resulting in a consumer complaint being filed with the Department (Consumer Complaint No. 2007-765, hereinafter the “Complaint”). American Fidelity submitted a timely request for hearing on the Order, and the administrative hearing process was commenced with the Department and American Fidelity exchanging discovery. The Department and American Fidelity thereupon entered into settlement negotiation resulting in this Consent Order No. 2007-MBR-25-b.

American Fidelity admits herein in regards to the Complaint that Hodor engaged in improper loan solicitor activities with the consumer and that Hodor's improper loan solicitor activities, although unauthorized by American Fidelity, were nevertheless conducted under American Fidelity's residential mortgage license. The Department and American Fidelity stipulate that American Federal has provided evidence since issuance of the Order that American Fidelity has implemented procedures to improve its management and oversight of loan solicitation activities by its employees.

### **TERMS AND CONDITIONS**

WHEREFORE, the Department and agree as follows:

- I. The Department reduces the fine to three thousand dollars (\$3,000);
- II. American Fidelity agrees to dismiss its petition for hearing and administrative review of the Order and waives any right to re-file its petition, or file any petition or other appeal of the Order or of this Consent Order. American Fidelity acknowledges that it has been represented by legal counsel in negotiating this Consent Order, and that it willingly enters into this Consent Order, upon advice of counsel, and after full review, evaluation, and consideration and with full knowledge of its rights under the Act, and Illinois Administrative Procedure Act.
- III. 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.
- IV. 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: \_\_\_\_\_  
STEVEN GARCIA  
American Fidelity Financial Services, Inc.

ILLINOIS DEPARTMENT OF FINANCIAL AND PROFESSIONAL REGULATION  
DEAN MARTINEZ, SECRETARY

DIVISION OF BANKING  
JORGE A. SOLIS, DIRECTOR

\_\_\_\_\_ date: June 6, 2008  
REYNOLD M. BENJAMIN  
Assistant Director, Division of Banking