

**CONSENT AGREEMENT
BETWEEN
PLATINUM BROKERAGE, LTD., DBA JERICHO MORTGAGE
AND
THE OHIO DIVISION OF FINANCIAL INSTITUTIONS**

This Consent Agreement is entered into by and between Platinum Brokerage, Ltd., DBA Jericho Mortgage, and the Ohio Division of Financial Institutions ("DFI"), a state agency charged with enforcing the Ohio Mortgage Broker Act ("OMBA"), codified in Chapter 1322 of the Ohio Revised Code ("R.C.").

Platinum Brokerage, Ltd., DBA Jericho Mortgage (hereinafter referred to as "Platinum Brokerage"), enters into this Consent Agreement being fully informed of its rights under R.C. Chapter 119, including the right to representation by counsel and the right to a formal adjudicative hearing on the issues considered herein. Platinum Brokerage is represented in this agreement by Rod Kenneth Cotner ("Cotner"), an owner of the corporation. Cotner is also representing his own personal interests in this agreement as the proposed operations manager for Platinum Brokerage

BASIS FOR ACTION

This Consent Agreement is entered into on the basis of the following stipulations, admissions and understandings:

- A. DFI is empowered to refuse to issue an applicant a mortgage broker certificate of registration if DFI finds that the person designated as the applicant's operations manager has pleaded guilty to or has been convicted of any criminal offense involving theft, receiving stolen property, embezzlement, forgery, fraud, passing bad checks, money laundering, or drug trafficking, or any criminal offense involving money or securities. R.C. 1322.03(A)(7), R.C. 1322.04(A)(7), and R.C. 1322.10(A).
- B. DFI is authorized to grant a certificate of registration to an applicant who has appointed a person who has pleaded guilty to or has been convicted of one of the crimes listed above as the applicant's operations manager, if the applicant has proven to DFI, by a preponderance of the evidence, that the proposed operations manager's activities and employment record since the conviction show that the proposed operations manager is honest, truthful, and of good reputation, and there is no basis in fact for believing that he/she will commit such an offense again. R.C. 1322.04(A)(7).
- C. DFI enters into this Consent Agreement in lieu of formal proceedings under R.C. Chapter 119 to deny Platinum Brokerage a mortgage broker certificate of registration. DFI expressly reserves the right to institute formal proceedings

based upon any violation of the OMBA, whether occurring before or after the effective date of this Agreement.

- D. Platinum Brokerage applied for a mortgage broker certificate of registration on November 26, 2002; that application is still pending.
- E. Platinum Brokerage has designated one of its owners, Cotner, as the corporation's operations manager.
- F. Platinum Brokerage and Cotner admit that in or around 1989, Cotner was convicted of one count of petty theft and that DFI is therefore empowered to refuse to issue the corporation a mortgage broker certificate of registration.
- G. As proof that Cotner is honest, trustworthy, and that there is no basis in fact for DFI to believe that he would commit such a crime again, Platinum Brokerage and Cotner submit the following:

Cotner admits that he did commit the crime for which he was convicted, namely theft. Cotner states that he committed the offense while he was a senior in high school and that he stole a shirt from a department store.

It has been nearly fourteen years since Cotner's misdemeanor conviction. Cotner has not been convicted of or plead guilty to any other criminal offense involving theft, receiving stolen property, embezzlement, forgery, fraud, passing bad checks, money laundering, or drug trafficking, or any criminal offense involving money or securities.

Since his conviction, Cotner has graduated from high school, worked in the automotive, credit, and mortgage industry and has been trusted with management responsibilities and has earned many promotions. In the early 1990s, Cotner served as Finance Director for Ricart Automotive, and then went on to create a Customer Finance Department for the Ford Division of Ricart. Subsequently, Cotner was promoted to sales manager, wherein he was trusted to hire, train, and manage new employees in their day-to-day activities. Cotner further states that he has never been terminated from a job or engaged in any corrupt or unethical behavior.

Letters of reference, which testify to Cotner's upstanding character, have also been submitted.

- H. Based upon the statements and/or representations made by Cotner and Platinum Brokerage, DFI finds that Cotner has proven, by a preponderance of the evidence, that his activities and employment record since his convictions show that he is honest, truthful, and of good reputation, and that there is no basis in fact for believing that he will commit such an offense again.

AGREED CONDITIONS

Wherefore, in consideration of the foregoing and mutual promises hereinafter set forth, and in lieu of any formal proceedings at this time, Platinum Brokerage and Cotner knowingly and voluntarily agree with DFI to the following terms, conditions and limitations:

1. DFI shall approve of Platinum Brokerage's designation of Rod Kenneth Cotner as the corporation's operations manager, and DFI shall grant Platinum Brokerage a mortgage broker certificate of registration.
2. Should DFI discover that Platinum Brokerage and/or Cotner provided DFI with false, fraudulent, or misleading information in regards to the certificate of registration application or the information contained in or referenced to in this Consent Agreement, Platinum Brokerage agrees that such evidence firmly establishes that the company's character and general fitness do not command the confidence of the public and warrant the belief that the company will conduct business honestly and fairly in compliance with the purposes of the OMBA. Platinum Brokerage further agrees that such discovery is grounds for permanent revocation of its certificate of registration.

The above-described terms, conditions and limitations may be amended or terminated in writing at any time upon the agreement of both parties.

FAILURE TO COMPLY

If, in the discretion of DFI, Platinum Brokerage and/or Rod Kenneth Cotner appear to have violated or breached any term or condition of this Consent Agreement, DFI reserves the right to institute formal disciplinary proceedings for any and all possible violations or breaches, including but not limited to, alleged violations of the laws of Ohio occurring before the effective date of this Consent Agreement.

ACKNOWLEDGMENTS/LIABILITY RELEASE

Platinum Brokerage and Rod Kenneth Cotner acknowledge that they have had an opportunity to ask questions concerning the terms of this Consent Agreement and that all questions asked have been answered in a satisfactory manner.

CONSENT AGREEMENT
Platinum Brokerage, Ltd., DBA Jericho

Platinum Brokerage and Rod Kenneth Cotner hereby release DFI, its members, employees, agents, officers and representatives jointly and severally from any and all liability arising from the within matter.

This Consent Agreement shall be considered a public record as that term is used in R.C. 149.43, and may be reported to appropriate organizations, data banks, and governmental bodies, or released to the general public.

EFFECTIVE DATE

It is expressly understood that this Consent Agreement shall become effective upon the last date of signature below.



ROD KENNETH COTNER
Owner
Platinum Brokerage, Ltd., DBA Jericho Mortgage

Date

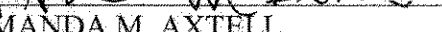


ROD KENNETH COTNER
In his personal capacity

Date

ROBERT M. GRIESER
Deputy Superintendent for Consumer Finance
Ohio Division of Financial Institutions

Date



AMANDA M. AXTELL
Attorney Examiner for Consumer Finance
Ohio Division of Financial Institutions

Date