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**STATE OF CALIFORNIA**  
**BUSINESS, TRANSPORTATION AND HOUSING AGENCY**  
**DEPARTMENT OF CORPORATIONS**

TO: Military Financial, Inc.  
1403 Foulk Road, Suite 203  
Foulkstone Plaza  
Wilmington, DE 19803

**DESIST AND REFRAIN ORDER**  
**(For violations of section 23005 of the California Financial Code)**

The California Corporations Commissioner (“Commissioner”) finds that:

1. At all relevant times, Military Financial, Inc. is, or was, a Delaware corporation, with no known place of business or agent for service of process in California. Military Financial, Inc.’s address is 1403 Foulke Road, Suite 203, Foulkstone Plaza, Wilmington, Delaware. Military Financial, Inc. maintains a website at <https://www.militaryfinancial.com>.

2. Military Financial, Inc. has engaged in the business of making, or offering to make, deferred deposit transactions over the internet through its website, marketed “exclusively to the U.S. military.”

3. According to its website, Military Financial, Inc. makes “advance pay loans” for amounts up to 40% of monthly take home pay. It offers loans for up to 60 days and allows “up to 4 paydays to repay the loan.” Each of these listed practices would be in violation of the California Deferred Deposit Transaction Law (“CDDTL”) (California Financial Code sections 23000 et seq.) if engaged in by a person licensed under that law.

4. According to Military Financial, Inc.’s website, repayment of the loan is made by electronically debiting the account where the borrower’s pay is deposited. This is equivalent to the use of a personal check for the purpose of satisfying the description of a “deferred deposit transaction” under California Financial Code, section 23001.

