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**STATE OF WASHINGTON
DEPARTMENT OF FINANCIAL INSTITUTIONS
DIVISION OF CONSUMER SERVICES**

IN THE MATTER OF DETERMINING
Whether there has been a violation of the
Mortgage Broker Practices Act of Washington by:

NO. C-10-050-10-FO01

ERIKA E. GIRON a/k/a ERIKA E. RADU,
ERICKA GIRON, ERIKA E. GIRONRADU,
ERIKA GIRON RADU, ERIKA SALAZAR,
ERICA GIRON, ERIKA ULATE,
STONEWATER & ASSOCIATES, LLC, and
PACIFIC EMPIRE LENDING, LLC,

FINAL ORDER OF DEFAULT

Respondents.

I. DIRECTOR'S CONSIDERATION

A. Default. This matter has come before the Director of the Department of Financial Institutions of the State of Washington (Director), through his designee, Consumer Services Division Director Deborah Bortner, pursuant to RCW 34.05.440(1). On October 19, 2010, the Director, through Consumer Services Division Director Deborah Bortner, entered a Statement of Charges and Notice of Intention to Enter an Order to Cease and Desist, Prohibit from Industry, Impose Fine, Order Restitution, and Collect Investigation Fee (Statement of Charges). A copy of the Statement of Charges is attached and incorporated into this order by this reference. The Statement of Charges was accompanied by a cover letter dated November 24, 2010, a Notice of Opportunity to Defend and Opportunity for Hearing, and blank Applications for Adjudicative Hearing for Erika E. Giron (all AKAs), Stonewater & Associates, LLC, and Pacific Empire Lending, LLC. The Department served the Statement of Charges, cover letter dated November 24, 2010, Notice of Opportunity to Defend and Opportunity for Hearing, and blank Applications for Adjudicative Hearing for Erika E. Giron (all

1 AKAs), Stonewater & Associates, LLC, and Pacific Empire Lending, LLC on Respondents, on
2 November 24, 2010, by First-Class mail and Federal Express overnight delivery. On November 26,
3 2010, the documents sent via Federal Express overnight delivery were delivered. The documents sent
4 via First-Class mail were not returned to the Department by the United States Postal Service.

5 Respondents did not request an adjudicative hearing within twenty calendar days after the
6 Department served them with the Notice of Opportunity to Defend and Opportunity for Hearing, as
7 provided for in WAC 208-08-050(2).

8
9 B. Record Presented. The record presented to the Director's designee for her review and for
10 entry of a final decision included the Statement of Charges, cover letter dated November 24, 2010,
11 Notice of Opportunity to Defend and Opportunity for Hearing, and blank Applications for
12 Adjudicative Hearing for ERIKA E. GIRON a/k/a ERIKA E. RADU, ERICKA GIRON, ERIKA E.
13 GIRONRADU, ERIKA GIRON RADU, ERIKA SALAZAR, ERICA GIRON, ERIKA ULATE,
14 STONEWATER & ASSOCIATES, LLC, and PACIFIC EMPIRE LENDING, LLC, with
15 documentation of service;

16 C. Factual Findings and Grounds For Order. Pursuant to RCW 34.05.440(1) the Director's
17 designee hereby adopts the Statement of Charges, which is attached hereto.

18 19 II. FINAL ORDER

20 Based upon the foregoing, and the Director's designee having considered the record and
21 being otherwise fully advised, NOW, THEREFORE:

22 A. IT IS HEREBY ORDERED, That:

- 23 1. Respondents cease and desist conducting the business of a mortgage broker;
24 2. Respondent Erika E. Giron cease and desist conducting the business of a loan
25 originator;

3. Respondents are prohibited from participation in the conduct of the affairs of any mortgage broker subject to licensure by the Director, in any manner, for a period of five (5) years;
4. Respondents jointly and severally pay a fine of \$36,500;
5. Respondents jointly and severally pay \$11,250 to the borrowers referenced in Paragraph 1.2(A) of the Statement of Charges;
6. Respondents jointly and severally pay \$9,200 to the borrowers referenced in Paragraph 1.2(B) of the Statement of Charges; and
7. Respondents jointly and severally pay an investigation fee totaling \$3,360.

B. Reconsideration. Pursuant to RCW 34.05.470, Respondents have the right to file a Petition for Reconsideration stating the specific grounds upon which relief is requested. The Petition must be filed in the Office of the Director of the Department of Financial Institutions by courier at 150 Israel Road SW, Tumwater, Washington 98501, or by U.S. Mail at P.O. Box 41200, Olympia, Washington 98504-1200, within ten (10) days of service of the Final Order upon Respondents. The Petition for Reconsideration shall not stay the effectiveness of this order nor is a Petition for Reconsideration a prerequisite for seeking judicial review in this matter.

A timely Petition for Reconsideration is deemed denied if, within twenty (20) days from the date the petition is filed, the agency does not (a) dispose of the petition or (b) serve the parties with a written notice specifying the date by which it will act on a petition.

C. Stay of Order. The Director's designee has determined not to consider a Petition to Stay the effectiveness of this order. Any such requests should be made in connection with a Petition for Judicial Review made under chapter 34.05 RCW and RCW 34.05.550.

1 D. Judicial Review. Respondents have the right to petition the superior court for judicial
2 review of this agency action under the provisions of chapter 34.05 RCW. For the requirements for filing
3 a Petition for Judicial Review, see RCW 34.05.510 and sections following.

4 E. Non-compliance with Order. If you do not comply with the terms of this order, the
5 Department may seek its enforcement by the Office of Attorney General to include the collection of the
6 fines, fees, and restitution imposed herein.

7 F. Service. For purposes of filing a Petition for Reconsideration or a Petition for Judicial
8 Review, service is effective upon deposit of this order in the U.S. mail, declaration of service attached
9 hereto.

10
11 DATED this 10th day of January, 2011.

12 STATE OF WASHINGTON
13 DEPARTMENT OF FINANCIAL INSTITUTIONS



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16 DEBORAH BORTNER
17 DIRECTOR
18 DIVISION OF CONSUMER SERVICES

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**STATE OF WASHINGTON
DEPARTMENT OF FINANCIAL INSTITUTIONS
DIVISION OF CONSUMER SERVICES**

IN THE MATTER OF DETERMINING
Whether there has been a violation of the Mortgage
Broker Practices Act of Washington by:

NO. C-10-050-10-SC01

ERIKA E. GIRON a/k/a ERIKA E. RADU, ERICKA
GIRON, ERIKA E. GIRONRADU, ERIKA GIRON
RADU, ERIKA SALAZAR, ERICA GIRON, ERIKA
ULATE,
STONEWATER & ASSOCIATES, LLC, and
PACIFIC EMPIRE LENDING, LLC,

STATEMENT OF CHARGES and NOTICE OF
INTENTION TO ENTER AN ORDER TO CEASE
AND DESIST, PROHIBIT FROM INDUSTRY,
IMPOSE FINE, ORDER RESTITUTION, AND
COLLECT INVESTIGATION FEE

Respondents.

INTRODUCTION

Pursuant to RCW 19.146.220 and RCW 19.146.223, the Director of the Department of Financial
Institutions of the State of Washington (Director) is responsible for the administration of chapter 19.146 RCW, the
Mortgage Broker Practices Act (Act)¹. After having conducted an investigation pursuant to RCW 19.146.235, and
based upon the facts available as of this Statement of Charges, the Director, through his designee, Division of
Consumer Services Director Deborah Bortner, institutes this proceeding and finds as follows:

I. FACTUAL ALLEGATIONS

1.1 Respondents.

**A. Erika E. Giron a/k/a Erika E. Radu, Ericka Giron, Erika E GironRadu, Erika Giron
Radu, Erika Salazar, Erica Giron, and Erika Ulate (Respondent Giron)** is the owner of Stonewater &
Associates, LLC and Pacific Empire Lending, LLC. Respondent Giron has never been licensed by the
Department of Financial Institution, Division of Consumer Services (Department).

B. Stonewater & Associates (Respondent Stonewater) is registered with the Washington State
Departments of Revenue and Licensing, is a sole proprietorship, and has never been licensed by the
Department.

¹ The version of RCW 19.146 in effect at the time of the violations herein.

1 **C. Pacific Empire Lending, LLC (Respondent Pacific)** is registered with the Washington State
2 Departments of Revenue and Licensing, is a sole proprietorship, and has never been licensed by the
3 Department.

4 **1.2 Unlicensed Activity and Unlicensed Locations.**

5 **A. Respondent Giron and Respondent Stonewater.** Between at least January 1, 2009, and
6 December 31, 2010, Respondents Giron and Stonewater assisted at least one borrower in applying to obtain a
7 residential mortgage loan when Respondents Giron and Stonewater were conducting business from 451 S.W.
8 10th St., Suite 104, in Renton, Washington. The property the borrower was attempting to obtain a loan for was
9 located in the state of Arizona. The borrower involved in this residential mortgage loan pre-paid fees to
10 Respondents Giron and Stonewater totaling at least \$11,250. The loan did not fund, and Respondents Giron
11 and Stonewater have not refunded the pre-paid fees to the borrower. Respondents Giron and Stonewater did not
12 provide the borrower with any of the disclosures required by the Act or the Real Estate Settlement Procedures
13 Act (such as a Good Faith Estimate and a Truth In Lending statement).

14 **B. Respondent Giron and Respondent Pacific.** Between at least January 1, 2009, and December
15 31, 2009, Respondents Giron and Pacific assisted at least 3 borrowers in applying to obtain residential mortgage
16 loans when Respondents Giron and Pacific were conducting business from 16110 Woodinville-Redmond Rd.
17 N.E., in Woodinville, Washington. The properties the borrowers were attempting to obtain loans for were
18 located in Georgia (1) and Illinois (2). The borrowers paid fees to Respondents Giron and Pacific totaling at
19 least \$9,250 as follows:

- | | | |
|----|----------------------------|----------------|
| 20 | 1. Borrowers R.L. and D.L. | \$5,900 |
| 21 | 2. Borrowers N.H. and J.H. | \$2,250 |
| | 3. <u>Borrower M.F.</u> | <u>\$1,050</u> |
| | | \$9,200 |

22 The loans did not fund, and Respondents Giron and Pacific have not refunded the fees to the borrowers.
23 Respondents Giron and Pacific did not provide the 3 borrowers with any of the disclosures required by the Act
24 or the Real Estate Settlement Procedures Act (such as a Good Faith Estimate and a Truth In Lending statement).
25

1 **1.3 Unauthorized Advertising.**

2 **A. Respondent Giron and Respondent Stonewater.** Respondents Giron and Stonewater held
3 themselves out as able to perform the business of a loan originator and mortgage broker on the company
4 website: www.stonewaterandassociates.com. The following statements were posted on Respondent
5 Stonewater's internet site which has since been shut down:

6 **"Founded in 2008, Stonewater and Associates, LLC is one of the nation's**
7 **mortgage broker firms, headquartered in Washington State. Stonewater and**
8 **Associates, LLC is pleased to provide loan originating services, through our**
9 **unique Bank Agent Program, the bridge to closing loans in all 50 states**
10 **conforming and FHA. This program is RESPA compliant and has been reviewed**
11 **and approved. Stonewater and Associates, LLC are able to originate loans in all**
12 **50 states with a Federally Chartered Bank**

13 **Our professionals act as mortgage consultants, not simply brokers,**
14 **focusing on providing the appropriate financing solutions for each deal and each**
15 **client. We manage every detail of the loan process from start to finish that's**
16 **effortless and transparent to our clients. We act as your personal mortgage**
17 **consultants to find the best financing solutions for each deal and each client.**
18 **From small loans to large loans, we deliver the results that have earned the trust**
19 **and confidence of borrowers and lenders nationwide."**

20 This information was posted on the website through at least September 17, 2009.

21 **B. Respondent Giron and Respondent Pacific.** Respondents Giron and Pacific held themselves
22 out as able to perform the business of a loan originator and mortgage broker on the company website:
23 www.pacificempirelending.net. The following statements were posted on Respondent Pacific's internet site
24 (which is now shut down) and is very similar to the language used in Respondent Stonewater website (see
25 Paragraph 1.3(A):

26 **"Pacific Empire Lending, LLC is one of the nation's only Mortgage**
27 **Consulting Firms, headquartered in Seattle, Washington. Pacific Empire**
28 **Lending, LLC is pleased to provide loan originating services, through our unique**
29 **Bank Agent Program, the bridge to closing loans in all 50 states conforming and**
30 **FHA. This program is RESPA compliant and has been reviewed and approved.**
31 **Pacific Empire Lending, LLC is able to originate loans in all 50 states with a**
32 **Federally Chartered Bank."**

33 This information was posted on the website through at least December 9, 2009.

1 **1.4 Failure to Completely Respond to Directives and Maintain Records.**

2 **A. Respondent Giron and Respondent Stonewater.** On or about November 19, 2009, the
3 Department served a directive on Respondents Giron and Stonewater by FedEx Overnight Delivery. The
4 directives were signed for by Erika Radu. The directives directed Respondents Giron and Stonewater to
5 provide a list of all residential mortgage loans originated (along with the actual loan documents) for borrowers
6 in the state of Washington from January 2009 through the date of the directive. On or about December 23,
7 2009, the Department received a response to the directives from Respondent Giron's and Respondent
8 Stonewater's attorney. The response indicates Respondents Giron and Stonewater had engaged in the business
9 of a mortgage broker. The response also included an Agreement to Cease and Desist that was signed by Erika
10 Giron and dated December 23, 2009, as the owner of Respondent Stonewater and as an individual.
11 Respondents Giron and Stonewater did not provide the requested documentation and further explained they did
12 not have any documents that were responsive to our directive.

13 On or about December 28, 2009, the Department sent a second directive to Respondent Giron's and
14 Respondent Stonewater's attorney. The directive requested the "names, addresses, and contact information for
15 every business entity Erika Giron owned or had a legal interest in that would require licensure by the
16 Department." The directive to Respondent Giron's attorney included a request to provide a further explanation
17 of a response by Respondent Giron's attorney (to the first directive) that Erika Giron's "sole business activity
18 consists of payday loan processing."

19 On or about January 16, 2010, Respondent Giron's and Respondent Stonewater's attorney informed the
20 Department that he no longer represents Respondents Giron and Stonewater and requested additional time for
21 Respondent Giron to respond. Respondent Giron, Respondent Stonewater, and Respondent Pacific have not
22 responded to the December 28, 2009, directives.

23 **B. Respondent Giron and Respondent Pacific.** On or about December 28, 2009, the
24 Department sent a directive addressed to Respondent Pacific for all loans originated by Respondent Pacific
25 from January 1, 2009, through the date of the directive.

1 On or about January 8, 2010, the Department sent Respondent Giron and Respondent Pacific a second
2 directive to provide a list of all residential mortgage loans originated by them from January 2009 through the
3 date of the directive. The directive was served through Respondent Giron's attorney. On or about January 16,
4 2010, Respondent Giron's and Respondent Pacific's attorney informed the Department that he no longer
5 represents Respondents Giron and Pacific and requested additional time for Respondent Giron to respond.
6 Respondent Giron and Respondent Pacific have not responded to the January 8, 2010 directive.

7 On or about February 11, 2010, the Department sent Respondents Giron and Pacific a second directive
8 to the business fax number listed on the letterhead of Respondent Pacific requesting a list of all residential
9 mortgage loans originated by them from January 2009 through the date of the directive. The fax transmission
10 report indicated the fax was successfully sent. Respondent Giron and Pacific did not respond to the second
11 directive.

12 **1.5 On-Going Investigation.** The Department's investigation into the alleged violations of the Act by
13 Respondents continues to date.

14 II. GROUNDS FOR ENTRY OF ORDER

15 **2.1 Definition of Mortgage Broker.** Pursuant to RCW 19.146.010(12) and WAC 208-660-010(29),
16 "Mortgage Broker" means any person who, for compensation or gain, or in the expectation of compensation or
17 gain (a) makes a residential mortgage loan or assists a person in obtaining or applying to obtain a residential
18 mortgage loan or (b) holds himself or herself out as being able to make a residential mortgage loan or assist a
19 person in obtaining or applying to obtain a residential mortgage loan.

20 **2.2 Definition of a Loan Originator.** Pursuant to RCW 19.146.010(11)(a), a "Loan Originator" means a
21 natural person who for direct or indirect compensation or gain, or in the expectation of direct or indirect
22 compensation or gain (i) takes a residential mortgage loan application for a mortgage broker, or (ii) offers or
23 negotiates terms of a mortgage loan. "Loan originator" also includes a person who holds themselves out to the
24 public as able to perform any of these activities. "Loan originator" does not mean persons performing purely
25 administrative or clerical tasks for a mortgage broker.

1 **2.3 Definition of Borrower.** Pursuant to RCW 19.146.010(2), a “Borrower” is defined as any person who
2 consults with or retains a mortgage broker or loan originator in an effort to obtain or seek advice or information
3 on obtaining or applying to obtain a residential mortgage loan for himself, herself, or persons including himself
4 or herself, regardless of whether the person actually obtains such a loan.

5 **2.4 Prohibited Acts.** Based on the Factual Allegations set forth in Section I above, Respondents are in
6 apparent violation of RCW 19.146.0201(1), (2), (3), (4), (5), (6), (7), (9), (13), and (15) for directly or indirectly
7 employing a scheme, device or artifice to defraud or mislead borrowers or lenders or any person, engaging in an
8 unfair or deceptive practice toward any person, obtaining property by fraud or misrepresentation, insert subsec 4
9 summary, insert subsec 5 summary, failing to make disclosures to loan applicants and noninstitutional investors
10 as required by RCW 19.146.030 and any other applicable state or federal law, making, in any manner, any false
11 or deceptive statement or representation with regard to the rates, points, or other financing terms or conditions
12 for a residential mortgage loan or engaging in bait and switch advertising, collecting, charging, attempting to
13 collect or charge or using or proposing any agreement purporting to collect or charge any fee prohibited by
14 RCW 19.146.030 or RCW 19.146.070, and for failing to comply with any provision of RCW 19.146.030
15 through 19.146.080 or any rule adopted under those sections.

16 **2.5 Requirement to Disclose Residential Mortgage Loan Fees.** Based on the Factual Allegations set
17 forth in Section I above, Respondents are in apparent violation of RCW 19.146.030 for failing to provide
18 borrowers with full written disclosures, containing an itemization and explanation of all fees and costs that the
19 borrowers were required to pay in connection with obtaining a residential mortgage loan, within three days
20 following receipt of a loan application or any moneys from the borrowers..

21 **2.6 Requirement to Satisfy Fiduciary Duties.** Based on the Factual Allegations set forth in Section I
22 above, Respondents are in apparent violation of RCW 19.146.095 for failing to act in the borrowers’ best
23 interest and in the utmost good faith toward the borrowers.

24 **2.7 Requirement to Obtain and Maintain a Mortgage Broker License.** Based on the Factual
25 Allegations set forth in Section I above, Respondents are in apparent violation of RCW 19.146.200 for engaging

1 in the business of a mortgage broker and loan originator without first obtaining and maintaining a license under
2 the Act.

3 **2.8 Requirement to Obtain and Maintain a Loan Originator License.** Based on the Factual Allegations
4 set forth in Section I above, Respondents are in apparent violation of RCW 19.146.200 for engaging in the
5 business of a loan originator without first obtaining and maintaining a license under the Act.

6 III. AUTHORITY TO IMPOSE SANCTIONS

7 **3.1 Authority to Issue an Order to Cease and Desist.** Pursuant to RCW 19.146.220(4), the Director may
8 issue orders directing a licensee, its employee or loan originator, or other person subject to the Act to cease and
9 desist from conducting business.

10 **3.2 Authority to Prohibit from the Industry.** Pursuant to RCW 19.146.220(5), the Director may issue
11 orders removing from office or prohibiting from participation in the conduct of the affairs of a licensed
12 mortgage broker, or both, any officer, principal, employee, or loan originator of any licensed mortgage broker
13 or any person subject to licensing under the Act for any violation of RCW 19.146.0201(1) through (9) or (13),
14 RCW 19.146.030 through RCW 19.146.080, RCW 19.146.200, RCW 19.146.205(4), or RCW 19.146.265, or
15 failure to comply with a directive or order of the Director.

16 **3.3 Authority to Impose Fine.** Pursuant to RCW 19.146.220(2)(c),(d), and (e), and (3)(a) and (b), the
17 Director may impose fines on a licensee, employee or loan originator of the licensee, or other person subject to
18 the Act for failure to pay a fee required by the director or maintain the required bond, for failure to comply with
19 any directive, order, or subpoena of the director, for any violation of the Act, for any violations of RCW
20 19.146.0201(1) through (9) or (12), RCW 19.146.030 through RCW 19.146.080, RCW 19.146.200, RCW
21 19.146.205(4), or RCW 19.146.265, and for failure to comply with a directive or order of the Director.

22 **3.4 Authority to Order Restitution.** Pursuant to RCW 19.146.220(2)(c), (d), and (e), the Director may issue
23 orders directing a licensee, its employee or loan originator, or other person subject to the Act to pay restitution for
24 failure to pay a fee required by the director or maintain the required bond, for failure to comply with any
25 directive, order, or subpoena of the director, for any violation of the Act.

1 **3.5 Authority to Collect Investigation Fee.** Pursuant to RCW 19.146.228(2), WAC 208-660-520 and 550,
2 upon completion of any investigation of the books and records of a licensee or other person subject to the Act, the
3 Department will furnish to the licensee or other person subject to the Act a billing to cover the cost of the
4 investigation. The investigation charge will be calculated at the rate \$48 per hour that each staff person devoted to
5 the investigation.

6 **IV. NOTICE OF INTENTION TO ENTER ORDER**

7 Respondents' violations of the provisions of chapter 19.146 RCW and chapter 208-660 WAC, as set forth
8 in the above Factual Allegations, Grounds for Entry of Order, and Authority to Impose Sanctions, constitute a basis
9 for the entry of an Order under RCW 19.146.220, RCW 19.146.221 and RCW 19.146.223. Therefore, it is the
10 Director's intention to ORDER that:

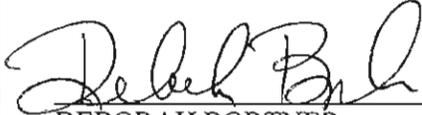
- 11 **4.1** Respondents Erika E. Giron, Stonewater & Associates, LLC, and Pacific Empire Lending, LLC cease and
12 desist conducting the business of a mortgage broker;
- 13 **4.2** Respondents Erika E. Giron cease and desist conducting the business of a loan originator;
- 14 **4.3** Respondents Erika E. Giron, Stonewater & Associates, LLC, and Pacific Empire Lending, LLC be
15 prohibited from participation in the conduct of the affairs of any mortgage broker subject to licensure by
16 the Director, in any manner, for a period of 5 years; and
- 17 **4.4** Respondents Erika E. Giron, Stonewater & Associates, LLC, and Pacific Empire Lending, LLC jointly and
18 severally pay a fine, which as of the date of these charges, totals \$36,500;
- 19 **4.5** Respondents Erika E. Giron and Stonewater & Associates, LLC jointly and severally pay restitution
20 totaling \$11,250 to the borrower referenced in Paragraph 1.2(A);
- 21 **4.6** Respondents Erika E. Giron and Pacific Empire Lending, LLC jointly and severally pay restitution totaling
22 \$9,200 to the borrowers referenced in Paragraph 1.2(B);
- 23 **4.7** Respondents Erika E. Giron, Stonewater & Associates, LLC, and Pacific Empire Lending, LLC jointly and
24 severally pay an investigation fee, which as of the date of these charges totals \$3,360 calculated at \$48 per
25 hour for the 70 staff hours devoted to the investigation; and
- 4.8** Respondents Erika E. Giron, Stonewater & Associates, LLC, and Pacific Empire Lending, LLC, maintain
records in compliance with the Act and provide the Department with the location of the books, records and
other information relating to Respondents Stonewater and Associates, LLC's and Pacific Empire Lending,
LLC's mortgage broker business, and the name, address and telephone number of the individual
responsible for maintenance of such records in compliance with the Act.

1 **V. AUTHORITY AND PROCEDURE**

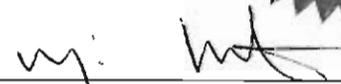
2 This Statement of Charges and Notice of Intention to Enter an Order to Cease and Desist, Prohibit from
3 Industry, Impose Fine, Order Restitution, and Collect Investigation Fee (Statement of Charges) is entered
4 pursuant to the provisions of RCW 19.146.220, RCW 19.146.221, RCW 19.146.223 and RCW 19.146.230, and
5 is subject to the provisions of chapter 34.05 RCW (The Administrative Procedure Act). Respondents may make
6 a written request for a hearing as set forth in the NOTICE OF OPPORTUNITY TO DEFEND AND
7 OPPORTUNITY FOR HEARING accompanying this Statement of Charges.

8
9 Dated this 19th day of October, 2010.



10 
11 _____
12 DEBORAH BORTNER
13 Director
14 Division of Consumer Services
15 Department of Financial Institutions

16 Presented by:

17 
18 _____
19 WILLIAM HALSTEAD
20 Financial Legal Examiner

21 Approved by:

22 
23 _____
24 JAMES R. BRUSSELBACK
25 Enforcement Chief