

ORDER SUMMARY – Case Number: C-07-190

Name(s): Kathleen L. Pace
Catherine D. Wiseman

Order Number: C-07-190-13-FO01 (Pace)
C-07-190-13-FO02 (Wiseman)

Effective Date: January 9, 2013 (Pace)
January 10, 2013 (Wiseman)

License Number: N/A
Or NMLS Identifier [U/L] (Revoked, suspended, stayed, application denied or withdrawn)
If applicable, you must specifically note the ending dates of terms.

License Effect: Prohibited from participation in the conduct of the affairs of any escrow agent subject to licensure by the Director, or any company exempt from licensure under the EARA.

Not Apply Until: The end of time.

Not Eligible Until: The end of time.

Prohibition/Ban Until: The end of time.

Investigation Costs	\$0	Due	Paid <input type="checkbox"/> Y <input type="checkbox"/> N	Date
Fine	\$0	Due	Paid <input type="checkbox"/> Y <input type="checkbox"/> N	Date
Assessment(s)	\$0	Due	Paid <input type="checkbox"/> Y <input type="checkbox"/> N	Date
Restitution	\$0	Due	Paid <input type="checkbox"/> Y <input type="checkbox"/> N	Date
Judgment	\$0	Due	Paid <input type="checkbox"/> Y <input type="checkbox"/> N	Date
Satisfaction of Judgment Filed?		<input type="checkbox"/> Y <input type="checkbox"/> N <input checked="" type="checkbox"/> N/A		
No. of Victims:				

Comments:

1 STATE OF WASHINGTON
2 DEPARTMENT OF FINANCIAL INSTITUTIONS
3 DIVISION OF CONSUMER SERVICES

4 IN THE MATTER OF DETERMINING
5 whether there has been a violation of the
6 Escrow Agent Registration Act of Washington by:
7 CATHERINE D. WISEMAN,
8 Respondent.

NO. C-07-190-13-FO02
FINAL ORDER

9 I. DIRECTOR'S CONSIDERATION

10 A. Default. This matter has come before the Director of the Department of Financial Institutions of the
11 State of Washington (Director), through his designee, Consumer Services Division Director Deborah Bortner
12 (Director's designee), pursuant to RCW 34.05.440(1). On March 18, 2011, the Director, through the
13 Director's designee, issued a Statement of Charges and Notice of Intent to Enter an Order to Prohibit from
14 Industry (Statement of Charges) against Catherine Diane Wiseman (Respondent). A copy of the Statement of
15 Charges is attached and incorporated into this order by this reference. The Statement of Charges was
16 accompanied by a cover letter dated March 18, 2011, a Notice of Opportunity to Defend and Opportunity for
17 Hearing, and a blank Application for Adjudicative Hearing for Respondent (collectively, accompanying
18 documents).

19 On March 18, 2011, the Department served Respondent with the Statement of Charges and accompanying
20 documents by First-Class mail and Federal Express overnight delivery. On March 21, 2011, the documents
21 sent by Federal Express overnight delivery were delivered. The documents sent by First-Class mail were not
22 returned to the Department by the United States Postal Service.

23 Respondent did not request an adjudicative hearing within twenty calendar days after the Department
24 served the Notice of Opportunity to Defend and Opportunity for Hearing, as provided for in WAC 208-08-
25 050(2).

B. Record Presented. The record presented to the Director's designee for her review and for entry of a
final decision included the Statement of Charges, accompanying documents, and documentation for service.

1 C. Factual Findings and Grounds for Order. Pursuant to RCW 34.05.440(1), the Director's designee
2 hereby adopts the attached Statement of Charges.

3 II. FINAL ORDER

4 Based upon the foregoing,

5 A. IT IS HEREBY ORDERED, that:

- 6 1. Respondent Catherine Diane Wiseman is prohibited from participation in the conduct of the
7 affairs of any escrow agent subject to licensure by the Director, or any company exempt from
licensure under the Escrow Agent Registration Act, in any capacity.

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

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

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

21 D. Judicial Review. Respondent has the right to petition the superior court for judicial review of this
22 agency action under the provisions of chapter 34.05 RCW. For the requirements for filing a Petition for
23 Judicial Review, see RCW 34.05.510 and sections following.

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

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4 DATED this 10th day of January, 2013.



STATE OF WASHINGTON
DEPARTMENT OF FINANCIAL INSTITUTIONS



DEBORAH BORTNER
Director, 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
Escrow Agent Registration Act of
Washington by:

CATHERINE D. WISEMAN,

Respondent.

NO. C-07-190-07-SC01

STATEMENT OF CHARGES and NOTICE OF
INTENT TO PROHIBIT FROM INDUSTRY

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INTRODUCTION

Pursuant to RCW 18.44.410 and RCW 18.44.430, the Director of the Department of Financial Institutions (Director) is responsible for the administration of chapter 18.44 RCW, the Escrow Agent Registration Act (Act). After having conducted an investigation pursuant to RCW 18.44.420 and WAC 208-680G-020, and based upon the facts available as of the date of this document, the Director, through his designee, Division of Consumer Services Director Deborah Bortner, institutes this proceeding and finds as follows:

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I. FACTUAL ALLEGATIONS

1.1 Respondent Catherine Diane Wiseman (Respondent Wiseman) was licensed with the Department of Financial Institutions (Department) as the Designated Escrow Officer (DEO) for Exceptional Escrow Corp. on or about August 18, 1994, license number 540-DO-21153. Respondent Wiseman was the owner and president of the company, and remained the licensed DEO until on or about June 22, 2007, when she voluntarily surrendered her license. Respondent Wiseman also was a Limited Practice Officer (LPO), license number 1085, certified by the Washington State Bar Association to select, prepare and complete documents for use in closing loans. Respondent Wiseman voluntarily cancelled her LPO license on or about September 10, 2007.

1.2 Exceptional Escrow Corp. (Exceptional) was licensed by the Department as an Escrow Agent on or about August 18, 1994, license number 540-EA-18585. Exceptional had a main office located in Renton, and two licensed branch offices, one in Bonney Lake, license number 28769, and one in North Bend, license number 26003. The company closed on or about June 22, 2007.

1 **1.3 Theft of Escrow Account Funds.**

2 **A.** On or about June 6, 2007, Respondent Wiseman admitted to the Department she had converted
3 more than \$65,000 of escrow trust funds to her personal use. Respondent Wiseman acknowledged that she
4 knew the conduct involved theft of trust funds and that the true owners of the converted funds were the
5 escrow principals and third parties.

6 **B.** On or about May 11, 2009, the Complex Prosecutions and Investigations Division of the King
7 County Prosecutor’s Office filed a Certification for Determination of Probable Cause (Certification.) The
8 Certification alleged that Respondent Wiseman had committed the crimes of Theft in the First Degree in
9 violation of RCW 9A.56.030, and Perjury in the Second Degree in violation of RCW 9A.72.030.

10 **C.** On or about September 24, 2009, Respondent Wiseman pled guilty to theft in the 1st degree in
11 King County Superior Court, cause number 09-1-04018-1.

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13 **II. GROUNDS FOR ENTRY OF ORDER**

14 **2.1 Requirement to Comply with the Escrow Agent Registration Act.** Based on the Factual
15 Allegations set forth in Section I above, Respondent Wiseman is in apparent violation of RCW 18.44.301 (1),
16 (3), and (5) by defrauding customers, obtaining property by fraud or misrepresentation, and knowingly taking
17 possession for personal use, with intent to defraud, property of an escrow business.

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19 **III. AUTHORITY TO IMPOSE SANCTIONS**

20 **3.1 Authority to Prohibit from the Industry.** Pursuant to RCW 18.44.430(3), the Director may prohibit
21 from participating in the affairs of any licensed escrow agent any officer, controlling person, director, employee,
22 or licensed escrow officer found to have violated any provision of the Act.

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1 **IV. NOTICE OF INTENT TO ENTER ORDER**

2 Respondent Wiseman’s violations of the provisions of Chapter 18.44 RCW, as set forth in the above Factual
3 Allegations, Grounds for Entry of Order, and Authority to Impose Sanctions, constitute a basis for the entry of an
4 Order under RCW 18.44.410 and 18.44.430. Therefore, it is the Director’s intent to order that:

5 **4.1** Respondent Catherine D. Wiseman be prohibited from participation in the conduct of the
6 affairs of any company licensed by the Department under the Act, or exempt from licensing under
7 the Act, in any capacity.

8 **V. AUTHORITY AND PROCEDURE**

9 This Statement of Charges and Notice of Intent to Prohibit from Industry is entered pursuant to the
10 provisions of RCW 18.44.410 and RCW 18.44.430, and is subject to the provisions of Chapter 34.05 RCW.
11 Respondent may make a written request for a hearing as set forth in the NOTICE OF OPPORTUNITY TO
12 DEFEND AND OPPORTUNITY FOR HEARING accompanying this Statement of Charges.

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14 Dated this 18th day of March 2011.

15 /s/
16 DEBORAH BORTNER
17 Director, Division of Consumer Services
Department of Financial Institutions

18 Presented by:

19 /s/
20 ANTHONY W. CARTER
21 Enforcement Attorney

22 Approved by:

23 /s/
24 JAMES R. BRUSSELBACK
25 Enforcement Chief

1 STATE OF WASHINGTON
2 DEPARTMENT OF FINANCIAL INSTITUTIONS
3 DIVISION OF CONSUMER SERVICES

4 IN THE MATTER OF DETERMINING
5 whether there has been a violation of the
6 Escrow Agent Registration Act of Washington by:

NO. C-07-190-13-FO01

FINAL ORDER

7 KATHLEEN L. PACE,

Respondent.

8 I. DIRECTOR'S CONSIDERATION

9 A. Default. This matter has come before the Director of the Department of Financial Institutions of the
10 State of Washington (Director), through his designee, Consumer Services Division Director Deborah Bortner
11 (Director's designee), pursuant to RCW 34.05.440(1). On March 18, 2011, the Director, through the
12 Director's designee, issued a Statement of Charges and Notice of Intent to Enter an Order to Prohibit from
13 Industry (Statement of Charges) against Kathleen Laverne Pace (Respondent). A copy of the Statement of
14 Charges is attached and incorporated into this order by reference. The Statement of Charges was
15 accompanied by a cover letter dated March 18, 2011, a Notice of Opportunity to Defend and Opportunity for
16 Hearing, and a blank Application for Adjudicative Hearing for Respondent (collectively, accompanying
17 documents).

18 On March 18, 2011, the Department served Respondent with the Statement of Charges and accompanying
19 documents by First-Class mail. On March 30, 2011, the Department received a completed Application for
20 Adjudicative Hearing wherein Respondent noted that she did not request a formal hearing in this matter.

21 Respondent did not request an adjudicative hearing within twenty calendar days after the Department
22 served the Notice of Opportunity to Defend and Opportunity for Hearing, as provided for in WAC 208-08-
23 050(2).

24 B. Record Presented. The record presented to the Director's designee for her review and for entry of a
25 final decision included the Statement of Charges, accompanying documents, the completed Application for
Adjudicative Hearing, and documentation for service.

1 C. Factual Findings and Grounds for Order. Pursuant to RCW 34.05.440(1), the Director's designee
2 hereby adopts the attached Statement of Charges.

3 II. FINAL ORDER

4 Based upon the foregoing,

5 A. IT IS HEREBY ORDERED that:

- 6 1. Respondent Kathleen Laverne Pace is prohibited from participation in the conduct of the affairs
7 of any escrow agent subject to licensure by the Director, or any company exempt from licensure
by the Department under the Escrow Agent Registration Act, in any capacity.

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

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

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

21 D. Judicial Review. Respondent has the right to petition the superior court for judicial review of this
22 agency action under the provisions of chapter 34.05 RCW. For the requirements for filing a Petition for
23 Judicial Review, see RCW 34.05.510 and sections following.

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

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4 DATED this 9th day of January, 2013.



STATE OF WASHINGTON
DEPARTMENT OF FINANCIAL INSTITUTIONS


DEBORAH BORTNER
Director, 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
Escrow Agent Registration Act of
Washington by:

KATHLEEN L. PACE,

Respondent.

NO. C-07-190-07-SC02

STATEMENT OF CHARGES and NOTICE OF
INTENT TO ENTER AN ORDER TO PROHIBIT
FROM INDUSTRY

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INTRODUCTION

Pursuant to RCW 18.44.410 and RCW 18.44.430, the Director of the Department of Financial Institutions (Director) is responsible for the administration of chapter 18.44 RCW, the Escrow Agent Registration Act (Act). After having conducted an investigation pursuant to RCW 18.44.420 and WAC 208-680G-020, and based upon the facts available as of the date of this document, the Director, through his designee, Division of Consumer Services Director Deborah Bortner, institutes this proceeding and finds as follows:

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I. FACTUAL ALLEGATIONS

1.1 Respondent Kathleen Laverne Pace (Respondent Pace) was licensed with the Department of Financial Institutions (Department) as an escrow officer for Exceptional Escrow Corp. (Exceptional) on or about February 28, 2006, license number 540-EO-29506. In April 2006, Respondent Pace became the Branch Designated Escrow Officer (BDEO), license number 540-BO-29506, for the Bellevue branch office of Exceptional. In August 2006, after the Bellevue branch office closed, Respondent Pace became the BDEO for the Bonney Lake branch office of Exceptional, retaining license number 540-BO-29506. On or about June 22, 2007, when Exceptional closed, Respondent Pace's license status was changed to inactive. Respondent Pace also was a Limited Practice Officer (LPO), license number 2472, certified to select, prepare and complete documents for use in closing loans. Respondent Pace changed her LPO license status to inactive on or about July 11, 2007, and voluntarily cancelled her LPO license on or about June 15, 2009.

1 **1.2 Exceptional Escrow Corp.** (Exceptional) was licensed by the Department as an Escrow Agent on or
2 about August 18, 1994, license number 540-EA-18585. Exceptional had a main office located in Renton, and
3 two licensed branch offices, one in Bonney Lake, license number 28769, and one in North Bend, license
4 number 26004. The company was closed on or about June 22, 2007, when the owner, Catherine D. Wiseman,
5 voluntarily surrendered the company's license.

6 **1.3 Catherine D. Wiseman** (Wiseman) was licensed by the Department as the Designated Escrow Officer
7 (DEO) of Exceptional on or about August 18, 1994, license, number 540-DO-21153. Wiseman was the owner
8 and president of Exceptional, and was the licensed DEO until or about June 22, 2007, when she surrendered
9 her license. As DEO of Exceptional, Wiseman had supervisory responsibility for the branch offices.

10 **1.4 Unlicensed Activity:** On or about June 4, 2007, during an on-site examination of the Bonney Lake
11 branch office, Respondent Pace admitted that from August 2006 through May 2007, she had essentially
12 swapped positions with Wiseman, whereby Respondent Pace had been acting as the DEO of the Renton location,
13 and Wiseman had been acting as the BDEO of the Bonney Lake branch location. Respondent Pace was never
14 licensed with the Department as the DEO of Exceptional's Renton location.

15 **1.7 Failure to Supervise:** From at least February 2007 through May 2007, Respondent Pace allowed an
16 unlicensed person, Su Patterson, to conduct business as an escrow officer from the Bonney Lake branch.

17 **1.8 Failure to Reconcile:** From at least July 2006 through May 2007, Respondent Pace did not reconcile the
18 Bonney Lake branch escrow accounts.

19 **1.9 Quarterly Reports:** As of February 2005, escrow agents were required to file with the Department an
20 Escrow Agent Quarterly Report Form (Report Form) within 30 days of the end of each fiscal quarter. The
21 Report Form, certified under penalty of perjury as being true and correct, details the status of the company's
22 trust account(s) (Part A: Trust Account Information) and operating issues (Part B: Escrow Agent Operations).
23 As BDEO of the Bellevue branch office, Respondent Pace was required to submit the Report Form for the 2nd
24 quarter of 2006. As BDEO of the Bonney Lake branch office, Respondent Pace was required to submit the
25 Report Form for the 3rd and 4th quarters of 2006 and the 1st quarter of 2007.

1 **1.10** Respondent Pace did not file the 2nd quarter 2006 Report Form, due July 30, 2006.

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3 **1.11** Respondent Pace filed the 3rd quarter 2006 Report Form, due October 30, 2006, on or about December
4 29, 2006, almost two months late. The Report Form, signed by Respondent Pace on or about November 30,
5 2006, certified with respect to Part A that:

- 6 A. The trust account had been reconciled at least monthly during the reporting period;
7 B. The trust account reconciliation had been completed within 30 days of the end of each month; and
8 C. All accounting exceptions to the reconciliation had been verified and corrected.

8 As of April 30, 2007, there remained at least six accounting exceptions exceeding \$19,000 for the 3rd quarter
9 of 2006.

10 **1.12** Respondent Pace further certified the 3rd quarter 2006 Report Form with respect to Part B that:

- 11 A. There had been no material adverse change in the financial condition of Exceptional.

12 In June 2006, payroll checks drawn on the operating account, including Respondent Pace's own pay, had been
13 returned by the bank marked Non-Sufficient Funds. In addition, in August 2006, a lender had called
14 Respondent Pace seeking a reconveyance in an escrow transaction closed on Wiseman's property a year
15 earlier. The lender alleged that Wiseman had paid off a \$150,000 HELOC, but had failed to request that the
16 account be closed. Wiseman's husband subsequently made a draw on the HELOC, preventing the
17 reconveyance of the Deed of Trust.

18 **1.13** The 3rd quarter 2006 Report Form was filed with the Department almost two months late.

19 **1.14** Respondent Pace filed the 4th quarter 2006 Report Form on or about February 7, 2007, eight days late.

20 The Report Form, signed by Respondent Pace on or about February 5, 2007, certified that:

- 21 A. The trust account had been reconciled at least monthly during the reporting period;
22 B. The trust account reconciliation had been completed within 30 days of the end of each month; and
23 C. All accounting exceptions to the reconciliation had been verified and corrected.

23 As of April 30, 2007, there remained at least seven accounting exceptions exceeding \$51,000 for the quarter
24 ending December 31, 2006.

25 **1.15** Respondent Pace further certified the 4th quarter 2006 Report Form with respect to Part B that:

1 A. There had been no material adverse change in the financial condition of Exceptional.

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3 In November 2006, Exceptional received a bill from a creditor for \$12,000 that the company was unable to
4 pay. Respondent Pace borrowed \$6,000 and made a partial payment to the creditor on the company's behalf.

5 **1.16** Respondent Pace did not submit the 1st quarter 2007 Report Form, due April 30, 2007. As of April 30,
6 2007, the Bonney Lake branch had at least 122 accounting exceptions exceeding \$3 million for the quarter
7 ending March 31, 2007.

8 **II. GROUNDS FOR ENTRY OF ORDER**

9 **2.1 Unlicensed Activity:** Based on the Factual Allegations set forth above, and by effecting escrow transactions
10 at the Renton office while not licensed for that location, Respondent Pace violated the provisions of
11 RCW 18.44.021, which makes it unlawful for any person to engage in business as an escrow agent within this
12 state unless that person holds a valid license issued by the Director.

13 **2.2 Failure to Supervise:** Based on the Factual Allegations set forth above, and by allowing an unlicensed
14 person to close escrow transactions at the Bonney Lake branch, Respondent Pace violated the provisions of RCW
15 18.44.071, which makes it unlawful for a BDEO to fail to supervise all persons performing escrow transactions at
16 a branch office.

17 **2.3 Failure to Reconcile:** Based on the Factual Allegations set forth above, and by failing to reconcile the trust
18 accounts at the Bonney Lake branch office, Respondent Pace violated the provisions of WAC 208-680E-011(8)
19 and (9), which require monthly three-way escrow account reconciliation.

20 **2.4 Failure to File:** Based on the Factual Allegations set forth above, and by failing to file Report Forms with
21 the Department, Respondent Pace violated the provisions of RCW 18.44.301(10), which in part prohibits any
22 designated escrow officer or employee from failing to file any report required by the Director.

23 **2.5 Late Filings:** Based on the Factual Allegations set forth above, and by failing to file Report Forms with the
24 Department within thirty days following the end of the fiscal quarter, Respondent Pace violated the provisions of

1 WAC 208-680E-025. Pursuant to WAC 208-680E-025(3), failure to timely file the Report Form is a violation of
2 RCW 18.44.430.

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4 **2.6 False Filings:** Based on the Factual Allegations set forth above, and by filing false or misleading Report
5 Forms with the Department, Respondent Pace violated the provisions of RCW 18.44.301(7), which in part
6 prohibits any designated escrow officer or employee knowingly making any false or misleading report.

7 **III. AUTHORITY TO IMPOSE SANCTIONS**

8 **3.1 Authority to Prohibit from the Industry:** Pursuant to RCW 18.44.430(3), the Director may prohibit from
9 participating in the affairs of any licensed escrow agent any officer, controlling person, director, employee, or
10 licensed escrow officer found to have violated any provision of the Act.

11 **IV. NOTICE OF INTENT TO ENTER ORDER**

12 Respondent Pace's violations of the provisions of Chapter 18.44 RCW, as set forth in the above Factual
13 Allegations, Grounds for Entry of Order, and Authority to Impose Sanctions, constitute a basis for the entry of an
14 Order under RCW 18.44.410 and 18.44.430. Therefore, it is the Director's intent to ORDER that:

15 **4.1** Respondent Kathleen L. Pace be prohibited from participation in the conduct of the affairs
16 of any company licensed by the Department under the Act, or exempt from licensing under the
Act, in any capacity.

17 **V. AUTHORITY AND PROCEDURE**

18 This Statement of Charges and Notice of Intent to Prohibit from Industry (Statement of Charges) is
19 entered pursuant to the provisions of RCW 18.44.410 and RCW 18.44.430, and is subject to the provisions of
20 Chapter 33.05 RCW. Respondent may make a written request for a hearing as set forth in the NOTICE OF

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4 OPPORTUNITY TO DEFEND AND OPPORTUNITY FOR HEARING accompanying this Statement of
5 Charges.

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7 Dated this 18th day of March 2011.

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/s/_____

DEBORAH BORTNER
Director, Division of Consumer Services

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Department of Financial Institutions

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13 Presented by:

14

/s/_____

ANTHONY W. CARTER
Enforcement Attorney

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17 Approved by:

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/s/_____

JAMES R. BRUSSELBACK
Enforcement Chief

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