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

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

NO. C-08-087-09-CO02

INTEGRITY LENDING LLC, and BRANDON  
LEE BARNUM, President, Designated Broker,  
Owner, MARLO M. H. BARNUM, Vice President,  
Owner, COREY JACOSHENK, Owner, DANIEL  
LEE TERRY, Loan Originator, CHRISTOPHER  
MOORE, Loan Originator, JAMES FOLK, Loan  
Originator,

CONSENT ORDER FOR  
CHRISTOPHER MOORE

Respondents.

COMES NOW the Director of the Department of Financial Institutions (Director), through his designee  
Deborah Bortner, Division Director, Division of Consumer Services, and Christopher Moore, Loan Originator  
(Respondent Moore) (hereinafter referred to as Respondent), and finding that the issues raised in the captioned  
matter may be economically and efficiently settled, agree to the entry of this Consent Order. This Consent Order  
is entered pursuant to chapter 19.146 of Revised Code of Washington (RCW), and RCW 34.05.060 of the  
Administrative Procedure Act, based on the following:

**AGREEMENT AND ORDER**

The Department of Financial Institutions, Division of Consumer Services (Department) and Respondents  
have agreed upon a basis for resolution of the matters alleged in Statement of Charges No. C-08-087-09-SC01  
(Statement of Charges), entered January 26, 2009, (copy attached hereto). Pursuant to chapter 19.146 RCW, the  
Mortgage Broker Practices Act (Act) and RCW 34.05.060 of the Administrative Procedure Act, Respondent  
hereby agrees to the Department's entry of this Consent Order and further agrees that the issues raised in the  
above-captioned matter may be economically and efficiently settled by entry of this Consent Order. The parties  
intend this Consent Order to fully resolve the Statement of Charges.

Based upon the foregoing:

CONSENT ORDER  
C-08-087-09-CO02  
CHRISTOPHER MOORE

1

DEPARTMENT OF FINANCIAL INSTITUTIONS  
Division of Consumer Services  
150 Israel Rd SW  
PO Box 41200  
Olympia, WA 98504-1200  
(360) 902-8703

1           A. **Jurisdiction.** It is AGREED that the Department has jurisdiction over the subject matter of the  
2 activities discussed herein.

3           B. **Waiver of Hearing.** It is AGREED that Respondent has been informed of the right to a hearing  
4 before an administrative law judge, and hereby waives his right to a hearing and any and all administrative and  
5 judicial review of the issues raised in this matter, or of the resolution reached herein. Accordingly, Respondent  
6 agrees to withdraw his appeal and to inform the Office of Administrative Hearings in writing of his withdrawal.

7           C. **Stipulations.** It is AGREED that Respondent Moore violated RCW 19.146.200(1), and WAC  
8 208-660-350(3) by engaging in the business of a loan originator without first obtaining and maintaining a  
9 license under the Act.

10           D. **Fine.** It is AGREED that Respondent shall pay to the Department a fine of \$560, in the form of a  
11 cashier's check made payable to the "Washington State Treasurer," upon entry of this Consent Order.

12           E. **Complete Cooperation with the Department and the Office of the Attorney General.** It is  
13 AGREED that Respondent shall cooperate fully, truthfully and completely with the Department and the Office  
14 of Attorney General and provide any and all information known to him relating in any manner to Integrity  
15 Lending LLC and Principals, James Folk, or Daniel Terry conducting or engaging in the business of a loan  
16 originator while working at Integrity Lending LLC. It is further AGREED that Respondent shall provide any  
17 and all documents, writings, materials, objects or evidence of any kind in his possession or under his care,  
18 custody, or control that he is authorized to possess, obtain, or distribute relating directly or indirectly to all areas  
19 of inquiry and investigation. Failure to cooperate fully, truthfully and completely is a breach of this Consent  
20 Order. It is further AGREED that Respondent shall testify fully, truthfully and completely at any proceeding  
21 related to the Department's investigation and enforcement actions related to this matter, including, but not  
22 limited to Integrity Lending LLC, Brandon Barnum, Marlo Barnum, Corey Jacoshenk, James Folk and Daniel  
23 Terry.

1 F. **Authority to Execute Order.** It is AGREED that the undersigned Respondent has represented and  
2 warranted that he has the full power and right to execute this Consent Order on behalf of the parties represented.

3 G. **Non-Compliance with Order.** It is AGREED that Respondent understands that failure to abide  
4 by the terms and conditions of this Consent Order may result in further legal action by the Director. In the  
5 event of such legal action, Respondent may be responsible to reimburse the Director for the cost incurred in  
6 pursuing such action, including but not limited to, attorney fees.

7 H. **Voluntarily Entered.** It is AGREED that the undersigned Respondent has voluntarily entered into  
8 this Consent Order, which is effective when signed by the Director's designee.

9 I. **Completely Read, Understood, and Agreed.** It is AGREED that Respondent has read this Consent  
10 Order in its entirety and fully understand and agree to all of the same.

11 **RESPONDENT:**

12 **Christopher Moore**

13 By:

14 

15 CHRISTOPHER MOORE

16 Individually

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05/04/09  
Date

DO NOT WRITE BELOW THIS LINE

THIS ORDER ENTERED THIS 12<sup>th</sup> DAY OF May, 2009.

*Deborah Bortner*

DEBORAH BORTNER  
Director  
Division of Consumer Services  
Department of Financial Institutions

Presented by:

*Marnie Sheeran*

MARNIE SHEERAN  
Financial Legal Examiner

Approved by:

*James R. Brusselback*

JAMES R. BRUSSELBACK  
Enforcement Chief



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**STATE OF WASHINGTON  
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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-08-087-09-SC02

INTEGRITY LENDING LLC. and BRANDON  
LEE BARNUM, President, Designated Broker,  
Owner, MARLO M. H. BARNUM, Vice  
President, Owner, COREY JACOSHENK,  
Owner, DANIEL LEE TERRY, Loan Originator,  
CHRISTOPHER MOORE, Loan Originator,  
JAMES FOLK, Loan Originator,

STATEMENT OF CHARGES and NOTICE OF  
INTENTION TO 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)<sup>1</sup>. After having conducted an investigation pursuant to RCW 19.146.210 and RCW 19.146.235, and based upon the facts available as of the date 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. Integrity Lending LLC (Respondent Integrity) was licensed by the Department of Financial Institutions of the State of Washington (Department) to conduct business as a mortgage broker on or about May 2, 2003, and continues to be licensed to date. Respondent Integrity is licensed to conduct the business of a

<sup>1</sup> RCW 19.146 (2007)

1 mortgage broker at 5075 SW Griffith Dr., Beaverton, Oregon (main office) and 18662 SW Boones Ferry Road,  
2 Tualatin, Oregon (branch office).

3 B. Brandon Lee Barnum (Respondent B. Barnum) is the President, Designated Broker, and an  
4 Owner of Respondent Integrity.

5 C. Marlo Marie Barnum (Respondent M. Barnum ) is the Vice President and an Owner of  
6 Respondent Integrity.

7 D. Corey Jacoshenk (Respondent Jacoshenk) is an Owner of Respondent Integrity.

8 E. Daniel Lee Terry (Respondent Terry) acted as a loan originator for Respondent Integrity  
9 between at least January 2007 and December 2007.

10 F. Christopher Moore (Respondent Moore) acted as a loan originator for Respondent Integrity  
11 between at least January 2007 and December 2007.

12 G. James Folk (Respondent Folk) acted as a loan originator for Respondent Integrity between at least  
13 January 2007 and December 2007.

14 **1.2 Unlicensed Activity.** Between January 2007 and December 2007, Respondent Terry assisted at least  
15 three (3) borrowers in applying to obtain or obtaining residential mortgage loans on property located in the State  
16 of Washington from Respondent Integrity's branch office<sup>1</sup>. To date, the Department has not issued a license to  
17 Respondent Terry to conduct the business of a loan originator from any location.

18 **1.3** Between August 2007 and November 2007, Respondent Moore assisted at least one (1) borrower in  
19 applying to obtain or obtaining a residential mortgage loan on property located in the State of Washington from  
20 Respondent Integrity's branch office. To date, the Department has not issued a license to Respondent Moore to  
21 conduct the business of a loan originator from any location.

22 **1.4** Between February 2007 and May 2007, Respondent Folk assisted at least one (1) borrower in applying  
23 to obtain or obtaining residential mortgage loans on property located in the State of Washington from  
24

25 <sup>1</sup> As noted above, Respondent Integrity's current branch office location is 18266 SW Boones Ferry Road, Tualatin, Oregon. The previous address of this branch office was 4650 SW Macadam Ave, Portland, Oregon. At least one of the loans originated by Respondent Terry, was originated at the previous branch office location.

1 Respondent Integrity's main office. To date, the Department has not issued a license to Respondent Folk to  
2 conduct the business of a loan originator from any location.

3 **1.5 Failure to Pay Examination Fees.** On or about November 30, 2007, the Department conducted an  
4 examination of Respondent Integrity's business. Beginning February 26, 2008, the Department issued monthly  
5 invoices for out-of-state travel costs, with interest accruing monthly, to Respondent Integrity. To date, the  
6 Department has not received payment for the outstanding travel costs, which as of the date of this Statement of  
7 Charges is \$857.35.

8 **1.6 On-Going Investigation.** The Department's investigation into the alleged violations of the Act by  
9 Respondents continues to date.

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

11 **2.1 Definition of Mortgage Broker.** Pursuant to RCW 19.146.010(12) and WAC 208-660-006,  
12 "Mortgage Broker" means any person who, for compensation or gain, or in the expectation of compensation or  
13 gain (a) makes a residential mortgage loan or assists a person in obtaining or applying to obtain a residential  
14 mortgage loan or (b) holds himself or herself out as being able to make a residential mortgage loan or assist a  
15 person in obtaining or applying to obtain a residential mortgage loan.

16 **2.2 Definition of Loan Originator.** Pursuant to RCW 19.146.010(10) and WAC 208-660-006, "Loan  
17 Originator" means a natural person who (a) takes a residential mortgage loan application for a mortgage broker,  
18 or (b) offers or negotiates terms of a mortgage loan, for direct or indirect compensation or gain, or in  
19 expectation of direct or indirect compensation or gain. "Loan Originator" also includes a person who holds  
20 themselves out to the public as able to perform any of these activities.

21 **2.3 Definition of Borrower.** Pursuant to RCW 19.146.010(2), a "Borrower" is defined as any person who  
22 consults with or retains a mortgage broker or loan originator in an effort to obtain or seek advice or information  
23 on obtaining or applying to obtain a residential mortgage loan for himself, herself, or persons including himself  
24 or herself, regardless of whether the person actually obtains such a loan.

25

1 **2.4 Requirement to Obtain or Maintain Loan Originator License.** Based on the Factual Allegations set  
2 forth in Section I above, Respondent Terry, Respondent Moore and Respondent Folk are in apparent violation  
3 of RCW 19.146.0201(2) and (3), RCW 19.146.200(1), and WAC 208-660-350(3) for engaging in the business  
4 of a loan originator without first obtaining and maintaining a license under the Act.

5 **2.5 Responsibility for Conduct of Loan Originators.** Pursuant to RCW 19.146.245 and WAC 208-660-  
6 155(3), a licensed mortgage broker is liable for any conduct violating the Act by the designated broker or loan  
7 originator employed or engaged by the licensed mortgage broker. Pursuant to RCW 19.146.200(4)(a) and (b), a  
8 designated broker or principal of a licensed mortgage broker is liable for an employee's violations of the act if  
9 the designated broker or principal directs or instructs the conduct or with knowledge of the specific conduct  
10 approves or allows the conduct, or knows or by the exercise of reasonable care and inquiry should have known  
11 of the conduct at the time when its consequences can be avoided or mitigated and fails to take reasonable  
12 remedial action.

13 **2.6 Prohibited Acts.** Based on the Factual Allegations set forth in Section I above, Respondents are in  
14 apparent violation of RCW 19.146.0201(1) and (2) for directly or indirectly employing a scheme, device or  
15 artifice to defraud or mislead borrowers or lenders or any person or engaging in an unfair or deceptive practice  
16 toward any person.

### 17 III. AUTHORITY TO IMPOSE SANCTIONS

18 **3.1 Authority to Impose Fine.** Pursuant to RCW 19.146.220(2)(b),(d) and (e) and RCW 19.146.220(3) (a)  
19 and (b), the Director may impose fines on a licensee, employee or loan originator of the licensee, or other  
20 person subject to the Act for any violations of RCW 19.146.0201(1) through (9) or (13), RCW 19.146.030  
21 through RCW 19.146.080, RCW 19.146.200, RCW 19.146.205(4), RCW 19.146.265, failure to comply with a  
22 directive or order of the Director or any violation of Chapter 19.146 RCW..

23 **3.2 Authority to Order Restitution.** Pursuant to RCW 19.146.220(2)(b),(d) and (e), the Director may issue  
24 orders directing a licensee, its employee or loan originator, or other person subject to the Act to pay restitution.

25



1 **3.3 Authority to Collect Investigation Fee.** Pursuant to RCW 19.146.228(2), WAC 208-660-550(5),  
2 upon completion of any investigation of the books and records of a licensee or other person subject to the Act,  
3 the 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 of forty-eight dollars (\$48) per hour that  
5 each staff person devoted to the investigation.

6 **3.4 Authority to Collect Examination Fee.** Pursuant to RCW 19.146.235(8), WAC 208-660-510(9)(b), and  
7 WAC 208-660-550(4)(b), upon completion of any examination of books and records of a licensee or other person  
8 subject to the Act located outside of the state of Washington, the Department will furnish to the licensee or other  
9 person subject to the Act a billing to cover the travel costs for the examination. The travel costs include, but are not  
10 limited to transportation costs, meals, and lodging.

#### 11 **IV. NOTICE OF INTENTION TO ENTER ORDER**

12 Respondents' violations of the provisions of chapter 19.146 RCW and chapter 208-660 WAC,  
13 as set forth in the above Factual Allegations, Grounds for Entry of Order, and Authority to Impose  
14 Sanctions, constitute a basis for the entry of an Order under RCW 19.146.210, RCW 19.146.220,  
15 RCW 19.146.221 and RCW 19.146.223. Therefore, it is the Director's intention to ORDER that:

16  
17 **4.1** Respondent Integrity Lending LLC, Respondent Brandon Lee Barnum, Respondent Marlo M. H. Barnum,  
18 Respondent Corey Jacoshenk, Respondent Daniel Lee Terry, Respondent Christopher Moore, and  
19 Respondent James Folk jointly and severally pay a fine, which as of the date of these charges totals  
\$11,250; and

20 **4.2** Respondent Integrity Lending LLC, Respondent Brandon Lee Barnum, Respondent Marlo M. H. Barnum,  
21 Respondent Corey Jacoshenk, Respondent Daniel Lee Terry, Respondent Christopher Moore, and  
22 Respondent James Folk jointly and severally refund all fees that inured to Respondents' benefit to the  
borrowers listed in paragraphs 1.2 through 1.4; and

23 **4.3** Respondent Integrity Lending LLC, Respondent Brandon Lee Barnum, Respondent Marlo M. H. Barnum,  
24 Respondent Corey Jacoshenk, Respondent Daniel Lee Terry, Respondent Christopher Moore, and  
25 Respondent James Folk jointly and severally pay an investigation fee in the amount of \$816 calculated at  
\$48 per hour for the seventeen (17) staff hours, as of the date of this Statement of Charges, devoted to the  
investigation; and

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**4.4** Respondent Integrity Lending LLC, Respondent Brandon Lee Barnum, Respondent Marlo M. H. Barnum, Respondent Corey Jacoshenk, Respondent Daniel Lee Terry, Respondent Christopher Moore, and Respondent James Folk pay examination travel expenses in the amount of \$857.35, as of the date of this Statement of Charges (interest accruing monthly); and

**4.5** Respondents maintain records in compliance with the Act and provide the Department with the location of the books, records and other information relating to Respondent Integrity 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.

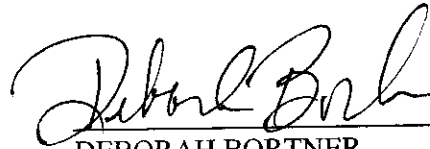
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**V. AUTHORITY AND PROCEDURE**

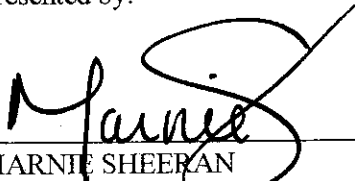
This Statement of Charges is entered pursuant to the provisions of RCW 19.146.220, RCW 19.146.221, RCW 19.146.223 and RCW 19.146.230, and is subject to the provisions of chapter 34.05 RCW (The Administrative Procedure Act). Respondents may make a written request for a hearing as set forth in the NOTICE OF OPPORTUNITY TO DEFEND AND OPPORTUNITY FOR HEARING accompanying this Statement of Charges.

Dated this 24<sup>th</sup> day of January, 2009.



DEBORAH BORTNER  
Director  
Division of Consumer Services  
Department of Financial Institutions

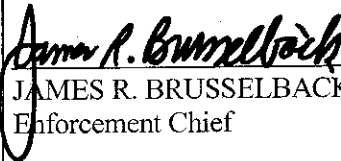
Presented by:



MARNIE SHEERAN  
Financial Legal Examiner



Approved by:

  
JAMES R. BRUSSELBACK  
Enforcement Chief