

ORDER SUMMARY – Case Number: C-08-344

Name(s): Robert E Sutton

Order Number: C-08-344-12-FO02

Effective Date: March 5, 2012

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Or NMLS Identifier [U/L] (Revoked, suspended, stayed, application denied or withdrawn)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:

Not Apply Until:

Not Eligible Until:

Prohibition/Ban Until: March 5, 2017

Investigation Costs	\$1,818.41	Due 3/5/12	Paid <input type="checkbox"/> Y <input checked="" type="checkbox"/> N	Date
Fine	\$6,000	Due 3/5/12	Paid <input type="checkbox"/> Y <input checked="" type="checkbox"/> N	Date
Assessment(s)	\$[see comments]	Due 3/5/12	Paid <input type="checkbox"/> Y <input checked="" type="checkbox"/> N	Date
Restitution	\$	Due	Paid <input type="checkbox"/> Y <input type="checkbox"/> N	Date
Judgment	\$	Due	Paid <input type="checkbox"/> Y <input type="checkbox"/> N	Date
Satisfaction of Judgment Filed?		<input type="checkbox"/> Y <input type="checkbox"/> N		
No. of Victims:				

Comments: Penalty: \$25,000 (\$5,000 per year for non-filing)
 Assessment: cannot be accurately calculated without CAR/AAR for unfiled years (either 2006 – 2010
 OR from 2006 until Centrix closed.)

1 STATE OF WASHINGTON
2 DEPARTMENT OF FINANCIAL INSTITUTIONS

3 IN THE MATTER OF DETERMINING:
4 Whether there has been a violation of the
5 Consumer Loan Act of Washington by:

No.: C-08-344-12-FO02

FINAL ORDER

6 CENTRIX FINANCIAL, LLC;
7 ROBERT E. SUTTON, CEO,

(ROBERT E. SUTTON ONLY)

8 Respondent.

9 I. DIRECTOR'S CONSIDERATION

10 A. Procedural History. This matter has come before the Director of the Department of
11 Financial Institutions of the State of Washington (Director), pursuant to RCW 34.05.464. On July
12 27, 2011, the Director, through Consumer Services Division Director Deborah Bortner, entered a
13 Statement of Charges and Notice of Intention to Enter an Order to Revoke License, Prohibit from
14 Industry, Impose Fine, File Annual Reports, Collect Annual Assessments, Assess Late Penalty,
15 Collect Investigation Costs, and Maintain Records (Statement of Charges). A copy of the Statement
16 of Charges is attached and incorporated into this order by this reference. The Statement of Charges
17 was accompanied by a cover letter dated July 28, 2011, a Notice of Opportunity to Defend and
18 Opportunity for Brief Adjudicative Proceeding, and a blank Request for Brief Adjudicative
19 Proceeding for Respondent (collectively, accompanying documents). On June 28, 2011, the
20 Department served Respondent with the Statement of Charges and accompanying documents, sent by
21 First-Class mail and Federal Express overnight delivery.

22 On August 11, 2011, Respondent filed an Application for an Adjudicative Hearing. On
23 October 25, 2011, the Department made a request to the Office of Administrative Hearings (OAR) to
24 assign an Administrative Law Judge (ALJ) to schedule and conduct a hearing on the Statement of

1 Charges. On November 15, 2011, OAR issued a Notice of Pre-Hearing Conference by Telephone
2 scheduling a prehearing conference on Thursday, December 22, 2011, at 10:00 a.m.

3 On December 5, 2011, the Department received a Notice of Withdrawal from Respondent
4 Sutton's attorney of record, Michael Connolly, with documentation of service upon the Department
5 and Respondent Robert Sutton. The Notice of Withdrawal contained the following advisement:

6 The Court has set the following motion deadlines, hearing dates, and trial dates:
7 Hearing on December 22, 2011.

8 The dates of these proceedings will not be delayed, nor the proceedings affected, by
9 withdrawal of counsel.

10 On December 22, 2011, the pre-hearing conference was held. The Department, represented
11 by Assistant Attorney General Victor Minjares, appeared, but Respondent Robert Sutton failed to
12 appear.

13 On December 23, 2011, Administrative Law Judge Mark H. Kim (ALJ Kim) issued an Initial
14 Order of Default Dismissing Respondents' Appeal for Failure to Appear. Pursuant to RCW
15 34.05.440 and WAC 10-08-110, Respondent had 7 days to file a motion requesting the Office of
16 Administrative Hearings vacate the Default order. Respondent did not file a motion to vacate during
17 the statutory period.

18 B. Record Presented. The record presented to the Director for his review and for entry of
19 a final decision included the following:

- 20 1. Statement of Charges, cover letter dated July 28, 2011, Notice of Opportunity
21 to Defend and Opportunity for Brief Adjudicative Proceeding, and blank
22 Request for Brief Adjudicative Proceeding for Respondent, with
23 documentation of service;
- 24 2. Applications for Adjudicative Hearing for Robert E. Sutton;
3. Request to OAH for Assignment of Administrative Law Judge;

- 1 4. Notice of Pre-hearing Conference by Telephone dated November 15, 2011,
2 with documentation of service;
- 3 5. Notice of Withdrawal by Michael Connolly, dated November 29, 2011, with
4 documentation of service;
- 5 6. Initial Order of Default Dismissing Respondents' Appeal for Failure to Appeal,
6 dated December 23, 2011, with documentation of service.

7 C. Factual Findings and Grounds for Order. Pursuant to RCW 34.05.461, the Director's
8 designee hereby adopts the Statement of Charges, which is attached hereto.

9 II. FINAL ORDER

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

12 A. IT IS HEREBY ORDERED, That:

- 13 1. Respondent Robert E. Sutton is prohibited from participation in the conduct of the
14 affairs of any consumer loan company subject to licensure by the Director, in any
15 manner, for a period of five years.
- 16 2. Respondent Robert E. Sutton pay a fine, jointly and severally, with Respondent
17 Centrix Financial, LLC, totaling \$6,000. (Note: Centrix Financial, LLC, is subject to a
18 separate order.)
- 19 3. Respondent Robert E. Sutton provide the Department with a completed Consolidated
20 Annual Report and a completed Annual Assessment Report, including all required
21 supporting documentation, for each of the calendar years that ended December 31,
22 2006; December 31, 2007; December 31, 2008; December 31, 2009; and December
23

1 31, 2010, respectively, and for the calendar year in which Respondent Centrix
2 Financial, LLC closed.

- 3 4. Respondent Robert E. Sutton pay, jointly and severally, with Respondent Centrix
4 Financial, LLC an annual assessment for the calendar years that ended December 31,
5 2006; December 31, 2007; December 31, 2008; December 31, 2009; and December
6 31, 2010, and for the year in which Respondent Centrix Financial, LLC closed, as
7 calculated in accordance with the instructions for the Annual Assessment Report for
8 each of those years. (Note: Centrix Financial, LLC, is subject to a separate order.)
- 9 5. Respondent Robert E. Sutton pay, jointly and severally, a \$5,000 penalty for failing to
10 file a Consolidated Annual Report and an Annual Assessment Report for each of the
11 calendar years that ended December 31, 2006; December 31, 2007; December 31,
12 2008; December 31, 2009; and December 31, 2010, respectively by March 1 of the
13 following year. (Note: Centrix Financial, LLC, is subject to a separate order.)
- 14 6. Respondent Robert E. Sutton pay, jointly and severally, with Centrix Financial LLC,
15 an investigation fee of \$1,818.41. (Note: Centrix Financial, LLC, is subject to a
16 separate order.)

17 B. Reconsideration. Pursuant to RCW 34.05.470, Respondent has the right to file a
18 Petition for Reconsideration stating the specific grounds upon which relief is requested. The Petition
19 must be filed in the Office of the Director of the Department of Financial Institutions by courier at
20 150 Israel Road SW, Tumwater, Washington 98501, or by U.S. Mail at P.O. Box 41200, Olympia,
21 Washington 98504-1200, within ten (10) days of service of the Final Order upon Respondent. The
22 Petition for Reconsideration shall not stay the effectiveness of this order nor is a Petition for
23 Reconsideration a prerequisite for seeking judicial review in this matter.

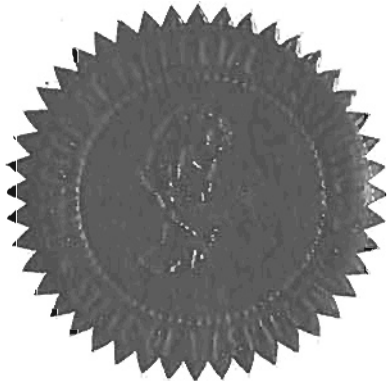
1 A timely Petition for Reconsideration is deemed denied if, within twenty (20) days from the
2 date the petition is filed, the agency does not (a) dispose of the petition or (b) serve the parties with a
3 written notice specifying the date by which it will act on a petition.

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

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

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

13 DATED this 5th day of March, 2012



16 STATE OF WASHINGTON
17 DEPARTMENT OF FINANCIAL INSTITUTIONS

18 [REDACTED]
19 SCOTT JARVIS
20 DIRECTOR

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25

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

IN THE MATTER OF DETERMINING
Whether there has been a violation of the
Consumer Loan Act of Washington by:

CENTRIX FINANCIAL, LLC,
ROBERT E. SUTTON, 100% Owner and CEO,

Respondents.

NO. C-08-344-11-SC01

STATEMENT OF CHARGES and
NOTICE OF INTENTION TO ENTER AN
ORDER TO REVOKE LICENSE, PROHIBIT FROM
INDUSTRY, IMPOSE FINE, FILE ANNUAL
REPORTS, COLLECT ANNUAL ASSESSMENTS,
ASSESS LATE PENALTY, COLLECT
INVESTIGATION COSTS, AND MAINTAIN
RECORDS

INTRODUCTION

Pursuant to RCW 31.04.093 and RCW 31.04.165, the Director of the Department of Financial Institutions of the State of Washington (Director) is responsible for the administration of chapter 31.04 RCW, the Consumer Loan Act (Act). After having conducted an investigation pursuant to RCW 31.04.145, and based upon the facts available as of the date of this Statement of Charges, the Director, by and through his designee, Division of Consumer Services Director, Deborah Bortner, institutes this proceeding and finds as follows:

I. FACTUAL ALLEGATIONS

1.1 Respondents.

- A. Centrix Financial, LLC. (Respondent Centrix Financial)** was licensed by the Department of Financial Institutions of the State of Washington (Department) to conduct business as a Consumer Loan Company on or about May 25, 2006, and continues to be licensed to date. Respondent Centrix Financial is licensed to conduct business as a consumer loan company at 6782 South Potomac Street, Centennial, Colorado, 80112. According to its application submitted to the Department, Respondent Centrix Financial's CEO and 100% Owner is Robert E. Sutton, and its President is Gerald Fitzgerald.
- B. Robert E. Sutton (Respondent Sutton)** is 100% owner of Respondent Centrix Financial and was listed as CEO of Respondent Centrix Financial at its time of licensure.

1 **1.2 Failure to Maintain Bond.** On or about July 26, 2006, the Department received a notice from
2 Travelers Casualty and Surety Company of America that Respondent Centrix Financial's surety bond
3 would be cancelled, effective September 14, 2006. From on or about September 14, 2006, through the
4 date of this Statement of Charges, Respondent Centrix Financial has not maintained the required surety
5 bond or permitted substitute.

6 **1.3 Ceasing Operations.** On or around November 20, 2007, the Department received notice that
7 Respondent Centrix Financial had filed for bankruptcy on or around September 15, 2006, pursuant to
8 Chapter 11 of the United States Bankruptcy Code, in the U.S. Bankruptcy Court of Colorado. The
9 bankruptcy was finalized in March, 2007, and Respondent Centrix Financial has not been a going concern
10 since that time. No closure documents have been received by the Department following the closure of the
11 company, as required by the Act. As of the date of this Statement of Charges, Respondents have not
12 complied with the closure requirements under the Act.

13 **1.4 Failure to File Reports.** A Consolidated Annual Report and an Annual Assessment Report,
14 concerning the business and operations of each licensed place of business conducted during the preceding
15 calendar year, are due to the Department on or before the first day of March or within 30 days of closure.
16 A licensee is subject to a penalty of \$50 per report for each day's delay in filing the required reports. As
17 of the date of this Statement of Charges, Respondents have not filed a Consolidated Annual Report
18 (CAR) and an Annual Assessment Report (AAR) for each of the calendar years 2006 through 2010, each
19 due to the Department on or before March 1¹ of the following year. If Respondent Centrix Financial has
20 closed, Respondents did not file a Consolidated Annual Report and Annual Assessment Report within 30
21 days of closure. In addition, a late penalty of \$100 per day has accrued for the 2006 through 2010 reports
22 and continues to accrue daily for all reports due prior to November 5, 2010.²

23 ¹ If March 1 falls on a non-business day, the due date is the first business day following March 1.

24 ² Pursuant to WAC 208-620-430, effective November 5, 2010, the maximum penalty assessed for late filing of these
25 reports is \$5,000 per reporting year. This amended rule applies only to Respondents' 2010 reports, which were due
March 1, 2011.

1 **1.5 Failure to Pay Annual Assessments.** Payment of an annual assessment, as calculated on the
2 Annual Assessment Report, is due to the Department on or before the first day of March or within 30
3 days of closure. As of the date of this Statement of Charges, Respondents have not paid an annual
4 assessment for each of the calendar years 2006 through 2010, due to the Department on or before March
5 1, of the following year. If Respondent Centrix Financial has closed, it did not pay an annual assessment
6 within 30 days of closure.

7 **1.6 Failure to Notify Department of Significant Developments.** As discussed in paragraph 1.2,
8 Respondent Centrix Financial's surety bond was cancelled in 2006. As of the date of this Statement of
9 Charges, Respondents have not notified the Department of receipt of notification of cancellation of the
10 surety bond. Additionally, Respondent Centrix Financial's corporate license expired on or about
11 November 1, 2007. As of the date of this Statement of Charges, Respondents have not notified the
12 Department of this expiration of its Washington state master business license and this change in standing
13 with the state of Washington Secretary of State.

14 **1.7 Failure to Obtain Approval to Maintain Records at an Out-Of-State Location.** Respondent
15 Centrix Financial appears to no longer be located at its licensed location. As of the date of this Statement
16 of Charges, Respondents have not requested approval in writing to maintain Respondent Centrix
17 Financial's records at any location other than its licensed location.

18 **1.8 Failure to Comply with Director's Authority.** On or around April 2, 2007, the Department
19 served a Directive on Respondent Centrix Financial regarding Respondent Centrix Financial's failure to
20 file its 2006 CAR & AAR. On or around November 14, 2007, the Department served a directive on
21 Respondent Centrix Financial at the address of its registered agent, requesting it to provide certain
22 documents and information more specifically set forth therein on or before November 26, 2007. On or
23 around March 15, 2008, the Department served a Directive on Respondent Centrix Financial regarding
24 Respondent Centrix Financial's failure to file its 2007 CAR & AAR. On or around December 23, 2008,
25 the Department served a Requirement and Directive, alerting Respondent Centrix Financial to its failure

1 to transition its license to the Nationwide Mortgage Licensing System and requiring that it complete the
2 transition by December 31, 2008. The Department has received no response to any of these Directives as
3 of the date of this Statement of Charges.

4 **1.9 On-Going Investigation.** The Department's investigation into the alleged violations of the Act
5 by Respondents continues to date.

6 II. GROUNDS FOR ENTRY OF ORDER

7 **2.1 Requirement to Maintain Surety Bond.** Based on the Factual Allegations set forth in Section I
8 above, Respondents are in apparent violation of RCW 31.04.045(6) for failing to maintain in effect a
9 surety bond or permitted substitute.

10 **2.2 Requirement to File Annual Reports.** Based on the Factual Allegations set forth in Section I
11 above, Respondents are in apparent violation of RCW 31.04.155, WAC 208-620-430(1), WAC 208-620-
12 460(1), and WAC 208-620-499(2) for failing to file a Consolidated Annual Report and an Annual
13 Assessment Report with the Director on or before the first day of March of each year, or within thirty
14 days of closure, giving such relevant information as the Director may reasonably require concerning the
15 business and operations of each licensed place of business conducted during the preceding calendar year.

16 **2.3 Requirement to Pay Annual Assessment.** Based on the Factual Allegations set forth in Section
17 I above, Respondents are in apparent violation of RCW 31.04.085, WAC 208-620-430(1), WAC 208-
18 620-460(1), and WAC 208-620-499(2) for failing to pay an annual assessment, as calculated on the
19 Annual Assessment Report, to the Director on or before the first day of March of each year, or within
20 thirty days of closure.

21 **2.4 Requirement to Report Significant Developments.** Based on the Factual Allegations set forth
22 in Section I above, Respondents are in apparent violation of WAC 208-620-490(1)(f) for failing to notify
23 the Department in writing at least ten days prior to ceasing operations, and WAC 208-620-490(2) for
24 failing to notify the Department in writing within ten days of: a change in Respondent Centrix Financial's
25 standing with the State of Washington's Secretary of State; and receipt of a notification of cancellation of

1 Respondent Centrix Financial's surety bond.

2 **2.5 Requirement to comply with Director's Authority.** Based on the Factual Allegations set forth
3 in Section I above, Respondents are in apparent violation of RCW 31.04.145 for failing to fully and
4 timely respond to Department directives. Pursuant to RCW 31.04.145, for the purpose of investigating
5 violations arising from the Act, the Director, either personally or by designee, may subpoena the books,
6 accounts, records, files, and any other documents the Director or designated person deems relevant to the
7 inquiry. No person subject to investigation under the Act may knowingly withhold any books, records, or
8 other information.

9 **2.6 Requirement to Maintain Records.** Based on the Factual Allegations set forth in Section I
10 above, Respondents are in apparent violation of RCW 31.04.155 and WAC 208-620-520 for failing to
11 maintain records at an approved out-of-state location. Pursuant to RCW 31.04.155 and WAC 208-620-
12 520, a licensee shall preserve the books, accounts, records papers, documents, files, and other information
13 relevant to a loan for at least twenty-five months after making the final entry on any loan. Pursuant to
14 WAC 208-620-380, an out-of-state licensee must request approval from the Department in writing to
15 maintain a licensee's records at an out-of-state location and must agree to provide the Department access
16 to the records.

16 III. AUTHORITY TO IMPOSE SANCTIONS

17 **3.1 Authority to Revoke License.** Pursuant to RCW 31.04.093(3) and WAC 208-620-570, the
18 Director may revoke a license if a licensee: has failed to pay any fee due the State of Washington; has
19 failed to maintain in effect the bond or permitted substitute; or, either knowingly or without the exercise
20 of due care, has violated any provision of the Act or any rule adopted under the Act.

21 **3.2 Authority to Prohibit from the Industry.** Pursuant to RCW 31.04.093(6), the Director may
22 issue orders removing from office or prohibiting from participation in the conduct of the affairs of a
23 consumer loan company, or both, any officer, principal, employee, or loan originator of any licensed
24 mortgage broker or consumer loan company, or any person subject to licensing under the Act for any

1 violation of RCW 31.04.027.

2 **3.3 Authority to Impose Fine.** Pursuant to RCW 31.04.093(4), the Director may impose fines of up
3 to one hundred dollars per day upon the licensee for any violation of the Act.

4 **3.4 Authority to Issue Order to Take Affirmative Action.** Pursuant to RCW 31.04.093(5), the
5 Director may issue an order directing the licensee, its employee or loan originator, or other person subject
6 to the Act, to take such affirmative action as is necessary to comply with the Act.

7 **3.5 Authority to Assess Report Late Penalties.** Pursuant to RCW 31.04.155 and WAC 208-620-
8 430(2), a licensee that fails to file a report that is required to be filed by the Act, within the time frame
9 required under the Act, is subject to a penalty of fifty dollars per report for each day of delay. ¹

10 **3.6 Authority to Collect Cost of Investigation.** Pursuant to RCW 31.04.145(3) and WAC 208-620-
11 590, every licensee examined or investigated by the Director or the Director's designee shall pay to the
12 Director the cost of the investigation, calculated at the rate of \$69.01 per staff hour spent on the investigation.
13 Pursuant to RCW 43.17.240, interest at the rate of one percent per month, or fraction thereof, shall accrue on
14 debts owed to the state, starting on the date the debts become past due.

14 IV. NOTICE OF INTENTION TO ENTER ORDER

15 Respondents' violations of the provisions of chapter 31.04 RCW and chapter 208-620 WAC, as set
16 forth in the above Factual Allegations, Grounds for Entry of Order, and Authority to Impose Sanctions,
17 constitute a basis for the entry of an Order under RCW 31.04.093, RCW 31.04.165, and RCW 31.04.205.

18 Therefore, it is the Director's intention to ORDER that:

19 **4.1** Respondent Centrix Financial LLC's license to conduct business as a consumer loan company be
20 revoked.

21 **4.2** Respondent Centrix Financial LLC be prohibited from participation in the conduct of the affairs of
22 any consumer loan company subject to licensure by the Director, in any manner, for a period of five
23 years.

24 **4.3** Respondent Robert E. Sutton be prohibited from participation in the conduct of the affairs of any
25 consumer loan company subject to licensure by the Director, in any manner, for a period of five
years.

¹ As of November 5, 2010, the maximum late penalty assessed is \$5,000 per reporting year.

- 1
2
3
4
5
6
7
8
9
10
11
12
13
14
- 4.4 Respondent Centrix Financial LLC and Respondent Robert E. Sutton jointly and severally pay a fine, which as of the date of this Statement of Charges totals \$6,000.
- 4.5 Respondent Centrix Financial LLC and Respondent Robert E. Sutton provide the Department with a completed Consolidated Annual Report and a completed Annual Assessment Report, including all required supporting documentation, for each of the calendar years that ended December 31, 2006, December 31, 2007, December 31, 2008, December 31, 2009, and December 31, 2010, respectively, and for the calendar year in which Respondent Centrix Financial LLC closed.
- 4.6 Respondent Centrix Financial LLC and Respondent Robert E. Sutton jointly and severally pay an annual assessment for the calendar years that ended December 31, 2006, December 31, 2007, December 31, 2008, December 31, 2009, and December 31, 2010, respectively, and for the calendar year in which Respondent Centrix Financial LLC closed, as calculated in accordance with the instructions for the Annual Assessment Report for each of those years.¹
- 4.7 Respondent Centrix Financial LLC and Respondent Robert E. Sutton jointly and severally pay a \$5,000 penalty for failing to file a Consolidated Annual Report and an Annual Assessment Report for each of the calendar years that ended December 31, 2006, December 31, 2007, December 31, 2008, December 31, 2009, and December 31, 2010, respectively, by March 1 of the following year.
- 4.8 Respondent Centrix Financial LLC and Respondent Robert E. Sutton jointly and severally pay the cost of the Department's investigation. As of the date of this Statement of Charges, the cost of the investigation totals \$1,818.41, calculated at \$69.01 per hour for 26.35 staff hours.
- 4.9 Respondent Centrix Financial LLC maintain records in compliance with the Act and provide the Director with the location of the books, records and other information relating to Respondent Centrix Financial LLC's consumer loan company business, and the name, address and telephone number of the individual responsible for maintenance of such records in compliance with the Act.

15 //
16 //
17 //
18 //
19 //
20 //
21 //

22
23 ¹ On or around March 29, 2010, the Department received \$1,500 from Travelers Casualty and Surety Company of America pursuant to a claim made on Respondent Centrix Financial's surety bond for the 2006 Annual Assessment, calculated at \$1,500 pursuant to WAC 208-620-430(3)(c).

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25

V. AUTHORITY AND PROCEDURE

This Statement of Charges is entered pursuant to the provisions of RCW 31.04.093, RCW 31.04.165, RCW 31.04.202, and RCW 31.04.205, 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 27th day of July, 2011.



[Redacted signature]

DEBORAH BORTNER
Director
Division of Consumer Services
Department of Financial Institutions

Presented by:

[Redacted signature]

SHANA L. OLIVER
Financial Legal Examiner

Approved by:

[Redacted signature]

JAMES R. BRUSSELBACK
Enforcement Chief