

ORDER SUMMARY – Case Number: C-10-093

Name(s): Alliance Law Center Corp
Cameron J. Edwards

Order Number: C-10-093-11-CO01

Effective Date: August 24,2011

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Or NMLS Identifier [U/L] (Revoked, suspended, stayed, application denied or withdrawn)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

Not Apply Until: _____

Not Eligible Until: _____

Prohibition/Ban Until: August 24, 2016

Investigation Costs	\$336	Due	Paid <input type="checkbox"/> Y <input checked="" type="checkbox"/> N	Date
Fine	\$5,000	Due	Paid <input type="checkbox"/> Y <input checked="" type="checkbox"/> N	Date
Assessment(s)	\$	Due	Paid <input type="checkbox"/> Y <input type="checkbox"/> N	Date
Restitution	\$	Due	Paid <input type="checkbox"/> Y <input type="checkbox"/> N	Date
Judgment	\$5,336	Due	Paid <input type="checkbox"/> Y <input checked="" type="checkbox"/> N	Date
Satisfaction of Judgment Filed?		<input type="checkbox"/> Y <input checked="" type="checkbox"/> N		
No. of Victims:				

Comments: Confession of judgment entered and filed. Respondents agree not to oppose restitution claim to CA Bar.

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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-10-093-11-CO01

CONSENT ORDER

ALLIANCE LAW CENTER CORP.,
and
CAMERON J. EDWARDS,
Owner,

Respondent(s).

COMES NOW the Director of the Department of Financial Institutions (Director), through his designee Deborah Bortner, Division Director, Division of Consumer Services, and Alliance Law Center, Corp. (Respondent Alliance), and Cameron J. Edwards, Owner (Respondent Edwards), and finding that the issues raised in the above-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 the 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

CONSENT ORDER
C-10-093-11-CO01
Alliance Law Center, Corp.
Cameron J. Edwards

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DEPARTMENT OF FINANCIAL INSTITUTIONS
Division of Consumer Services
150 Israel Rd SW
PO Box 41200
Olympia, WA 98504-1200
(360) 902.8703

1 No. C-10-093-11-SC01 (Statement of Charges), entered December 2, 2010 (copy attached hereto).
2 Pursuant to chapter 19.146 RCW, the Mortgage Broker Practices Act (Act) and RCW 34.05.060 of
3 the Administrative Procedure Act, Respondents hereby agree to the Department's entry of this
4 Consent Order and further agree that the issues raised in the above-captioned matter may be
5 economically and efficiently settled by entry of this Consent Order. The parties intend this Consent
6 Order to fully resolve the Statement of Charges. Respondents are agreeing not to contest the
7 Statement of Charges in consideration of the terms of this Consent Order.

8 Based upon the foregoing:

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

11 **B. Waiver of Hearing.** It is AGREED that Respondents have been informed of the right to a
12 hearing before an administrative law judge, and hereby waive their right to a hearing and any and all
13 administrative and judicial review of the issues raised in this matter, or of the resolution reached
14 herein. Accordingly, Respondents, by the signatures below, withdraw their appeal to the Office of
15 Administrative Hearings.

16 **C. Prohibition from Industry.** It is AGREED that for a period of five (5) years from the
17 date of entry of this Consent Order Respondents are prohibited from participating in the conduct of
18 the affairs of any mortgage broker licensed by the Department or subject to licensure or regulation by
19 the Department, in any capacity, including but not limited to: (1) any financial capacity whether
20 active or passive; or (2) as an officer, director, principal, partner, LLC member, designated broker,
21 employee, or loan originator; or (3) any management, control, oversight or maintenance of any trust
22 account(s) in any way related to any residential transaction; or (4) receiving, disbursing, managing or
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1 controlling in any way, consumer trust funds in any way related to any residential mortgage
2 transaction.

3 **D. Declaration of Financial Condition and Confession of Judgment.** It is AGREED that
4 Respondent Edwards has provided the Department with a Declaration comprehensively describing
5 his current financial condition and representing his current inability to pay the fine and investigation
6 fee obligations agreed to in Paragraphs E and F of this Consent Order. It is further AGREED that,
7 based on this Declaration, the Department has accepted a Confession of Judgment from Respondents
8 for said fine and investigation fee obligations. A copy of this Confession of Judgment is attached and
9 incorporated into this Consent Order by this reference. Consistent with RCW 4.60, the Department
10 may immediately seek entry of the judgment. Respondent Edwards shall, upon the Department's
11 request, fully and promptly cooperate with the Department in its efforts to get the judgment entered
12 by the superior court.

13 **E. Confession of Judgment for Fine.** It is AGREED that Respondents have entered into a
14 Confession of Judgment for a fine in the amount of \$5,000.00 owed to the Department.

15 **F. Confession of Judgment for Investigation Fee.** It is AGREED that Respondents have
16 entered into a Confession of Judgment for an investigation fee in the amount of \$336.00 owed to the
17 Department.

18 **G. Restitution.** It is AGREED that Respondents shall not oppose any restitution request
19 made by the borrowers identified in the Statement of Charges to the State Bar of California.

20 **H. Rights of Non-Parties.** It is AGREED that the Department does not represent or have the
21 consent of any person or entity not a party to this Consent Order to take any action concerning their
22 personal legal rights. It is further AGREED that for any person or entity not a party to this Consent
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1 Order, this Consent Order does not limit or create any private rights or remedies against Respondents,
2 limit or create liability of Respondents, or limit or create defenses of Respondents to any claims.

3 **I. Change of Address.** It is AGREED that for the duration of the period this Consent Order
4 is in effect, but no more than five (5) years unless otherwise agreed to in writing by the Department,
5 Respondent Edwards shall provide the Department with a mailing address and telephone number at
6 which he can be contacted and Respondent Edwards shall notify the Department in writing of any
7 changes to his mailing address or telephone number within fifteen (15) days of any such change.

8 **J. Complete Cooperation with the Department (Statements).** It is AGREED that, upon
9 written request by the Department, Respondent Edwards shall provide the Department truthful and
10 complete sworn statements outlining his activities with respect to Respondent Alliance and any and
11 all persons and entities involved or in any way associated with Respondent Alliance, including, but
12 not limited to, owners, employees, independent contractors, agents, businesses, and persons with
13 whom Respondent Alliance dealt, communicated, or otherwise related. The "sworn statements" may
14 take the form of affidavits, declarations, or deposition testimony, at the Department's discretion. A
15 failure to cooperate fully, truthfully, and completely is a breach of this Consent Order.

16 **K. Complete Cooperation with the Department.** In addition to providing the sworn
17 statements as described in Paragraph J, it is AGREED that, upon written request by the Department,
18 Respondent Edwards shall cooperate fully, truthfully, and completely with the Department and
19 provide any and all information known to him relating in any manner to Respondent Alliance and any
20 and all persons involved or in any way associated with Respondent Alliance, including, but not
21 limited to, owners, employees, independent contractors, agents, businesses, and persons with whom
22 Respondent Alliance dealt, communicated, or otherwise related. It is further AGREED that, upon
23 written request by the Department, Respondent Edwards shall provide any and all documents,

1 writings or materials, or objects or things of any kind in his possession or under his care, custody, or
2 control that he is authorized to possess, obtain, or distribute relating directly or indirectly to all areas
3 of the Department's inquiry and investigations. It is further AGREED that Respondent Edwards shall
4 testify fully, truthfully, and completely at any and all proceedings related to any Department
5 investigation or enforcement action or both related to any and all persons involved or in any way
6 associated with Respondent Alliance, and any respondents named therein. A failure to cooperate
7 fully, truthfully, and completely is a breach of this Consent Order.

8 **L. Records Retention.** It is AGREED that Respondents, their officers, employees, and
9 agents shall maintain such records currently in their possession in compliance with the Act and
10 provide the Director with the location of the books, records, and other information relating to
11 Respondents' mortgage broker business, and the name, address, and telephone number of the
12 individual responsible for maintenance of such records in compliance with the Act.

13 **M. Authority to Execute Order.** It is AGREED that the undersigned have represented and
14 warranted that they have the full power and right to execute this Consent Order on behalf of the
15 parties represented.

16 **N. Non-Compliance with Order.** It is AGREED that Respondents understand that failure to
17 abide by the terms and conditions of this Consent Order may result in further legal action by the
18 Director. In the event of such legal action, Respondents may be responsible to reimburse the Director
19 for the cost incurred in pursuing such action, including but not limited to, attorney fees.


20 **O. Voluntarily Entered.** It is AGREED that the undersigned Respondents have voluntarily
21 entered into this Consent Order, which is effective when signed by the Director's designee.

22 **P. Completely Read, Understood, and Agreed.** It is AGREED that Respondents have read
23 this Consent Order in its entirety and fully understand and agree to all of the same.

1 **RESPONDENTS:**

2 **Alliance Law Center Corp.**

3 By:

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Cameron J. Edwards

5 Owner

8/10/11
Date

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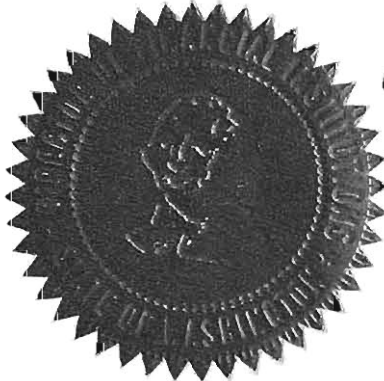
7 Cameron J. Edwards

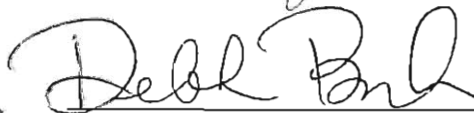
Individually

8/10/11
Date

9 DO NOT WRITE BELOW THIS LINE

10 THIS ORDER ENTERED THIS 24th DAY OF August, 2011



11 

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

16 Presented by:

17 

18 STEVEN C. SHERMAN
19 Financial Legal Examiner

20 Approved by:

21 

JAMES R. BRUSSELBACK
22 Enforcement Chief

23 RECEIVED

24 CONSENT ORDER
C-10-093-11-CO01
Alliance Law Center, Corp.
Cameron J. Edwards

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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-10-093-10-SC01

ALLIANCE LAW CENTER, CORP.,
and
CAMERON J. EDWARDS,
Owner,

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

Respondents.

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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 the date of these 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. **Alliance Law Center, Corp. (Respondent Alliance)** has never been licensed by the Department of Financial Institutions of the State of Washington (Department) to conduct business as a mortgage broker. Respondent Alliance is alleged to have conducted business as a mortgage broker from 600 B Street, Suite 2000, San Diego, California,² and 15822 Bernardo Center Drive, Suite C, San Diego, California.³

B. **Cameron J. Edwards (Respondent Edwards)** is known to have been licensed in California as an attorney at all times relevant to this Statement of Charges, and is alleged to be an owner of Respondent Alliance.

¹ All references to RCW 19.146 are to that version of the Act in effect at the time of the unlicensed activity.

² Obtained from the California Bar Association records and documents provided by borrowers.

³ Obtained from the California Secretary of State records.

1 **1.2 Unlicensed Activity.** Between at least May 1, 2009, and at least December 31, 2009, Respondents
2 assisted at least two borrowers in applying to modify residential mortgage loans on property located in the State
3 of Washington. Respondents received at least \$10,900 in advance fees for these services.

4 **1.3 Failure to Comply with Director's Authority.** On or about September 30, 2009, the Department sent
5 two Directives to Respondents by U.S. Mail at Respondents' place of business at 600 B Street, Suite 2000, San
6 Diego, California. The Directives required Respondents to provide certain documents and information more
7 specifically set forth therein within 15 days of mailing. The Directives were returned to the Department as
8 undeliverable.

9 On or about December 15, 2009, the Department sent Respondents two Directives by U.S. Mail at their
10 place of business at 15822 Bernardo Center Drive, Suite C, San Diego, California. The Directives required
11 Respondents to provide certain documents and information more specifically set forth therein within 15 days of
12 mailing. The Directives were returned to the Department as undeliverable.

13 On or about January 21, 2010, the Department served Respondents with the two Directives by U.S.
14 Mail at Respondent Edwards' residence. The Directives required Respondents to provide certain documents
15 and information more specifically set forth therein within 15 days of mailing. On or about March 3, 2010, the
16 Directives were returned to the Department with the name "Alliance Law Center" circled and the annotation
17 "Out of Business." Documents responsive to the Directive were not provided.

18 On or about March 10, 2010, the Department served a Subpoena on Respondents at Respondent
19 Edward's residence requiring Respondents to provide certain documents and information more specifically set
20 forth therein within 10 days of mailing. The Directives were not returned to the Department as undeliverable.
21 Respondents did not respond to the Subpoena.

22 **1.4 Prohibited Practices.** Respondents charged one borrower an advance fee of \$3,400 and a second
23 borrower an advance fee of \$7,500 to assist the borrowers with the modification of their residential mortgage
24 loans. Respondents, however, did not complete the contracted services and did not refund the borrowers'
25 money.

1 **1.5 On-Going Investigation.** The Department's investigation into the alleged violations of the Act by
2 Respondents continues to date.

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

4 **2.1 Definition of Mortgage Broker.** Pursuant to RCW 19.146.010(12) and WAC 208-660-006,
5 "Mortgage Broker" means any person who, for compensation or gain, or in the expectation of compensation or
6 gain (a) makes a residential mortgage loan or assists a person in obtaining or applying to obtain a residential
7 mortgage loan or (b) holds himself or herself out as being able to make a residential mortgage loan or assist a
8 person in obtaining or applying to obtain a residential mortgage loan. Pursuant to WAC 208-660-006, a person
9 "assists a person in obtaining or applying to obtain a residential mortgage loan" by, among other things,
10 counseling on loan terms (rates, fees, other costs), [and] preparing loan packages...."

11 **2.2 Requirement to Obtain a Mortgage Broker License.** Based on the Factual Allegations set forth in
12 Section I above, Respondents are in apparent violation of RCW 19.146.200 for engaging in the business of a
13 mortgage broker for Washington residents or property without first obtaining a license to do so.

14 **2.3 Requirement to Comply with Director's Authority.** Based on the Factual Allegations set forth in
15 Section I above, Respondents are in apparent violation of RCW 19.146.235 failing to comply with Directives of
16 the Director.

17 **2.4 Prohibited Practices.** Based on the Factual Allegations set forth in Section I above, Respondents are
18 in apparent violation of RCW 19.146.0201(2) and (3) for engaging in any unfair or deceptive practice toward
19 any person and for obtaining property by fraud or misrepresentation.

20 **III. AUTHORITY TO IMPOSE SANCTIONS**

21 **3.1 Authority to Prohibit from the Industry.** Pursuant to RCW 19.146.220(5)(a), the Director may issue
22 orders removing from office or prohibiting from participation in the conduct of the affairs of a licensed
23 mortgage broker, or both, any officer, principal, employee, or loan originator of any licensed mortgage broker
24 or any person subject to licensing under the Act for any violation of RCW 19.146.200.

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1 **3.2 Authority to Impose Fine.** Pursuant to RCW 19.146.220(2)(e), the Director may impose a fine for
2 failing to comply with a directive or subpoena of the Director or for any other violation of the Act.

3 **3.3 Authority to Order Restitution.** Pursuant to RCW 19.146.220(e), the Director may order restitution
4 for any violation of the Act.

5 **3.4 Authority to Collect Investigation Fee.** Pursuant to RCW 19.146.228(2) and WAC 208-660-550, the
6 Department may collect the costs of investigation. The investigation charge will be calculated at the rate of \$48 per
7 hour that each examiner devoted to the investigation.

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

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

13 **4.1** Respondents Alliance Law Center, Corp. and Cameron J. Edwards be prohibited from participation in the
14 conduct of the affairs of any mortgage broker subject to licensure by the Director, in any manner, for a
period of five years;

15 **4.2** Respondents Alliance Law Center, Corp. and Cameron J. Edwards jointly and severally pay a fine which as
16 of the date of these charges totals \$25,000;

17 **4.3** Respondents Alliance Law Center, Corp. and Cameron J. Edwards jointly and severally pay restitution to
18 the following borrowers:

18 E.B. - \$7,500
19 L.C. - \$3,400

20 **4.4** Respondents Alliance Law Center, Corp. and Cameron J. Edwards jointly and severally pay an
21 investigation fee which as of the date of these charges totals \$336, calculated at \$48 per hour for the 7
examiner hours devoted to the investigation to date; and

22 **4.5** Respondents Alliance Law Center, Corp. and Cameron J. Edwards maintain records in compliance with the
23 Act and provide the Department with the location of the books, records and other information relating to
Respondents' 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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1 **V. AUTHORITY AND PROCEDURE**

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

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9 Dated this 2nd day of December, 2010.



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A handwritten signature in cursive script, appearing to read "Deborah Bortner", written over a horizontal line.

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DEBORAH BORTNER
Director
Division of Consumer Services
Department of Financial Institutions

Presented by:

A handwritten signature in cursive script, appearing to read "Steven C. Sherman", written over a horizontal line.

STEVEN C. SHERMAN
Financial Legal Examiner

Approved by:

A handwritten signature in cursive script, appearing to read "James R. Brusselback", written over a horizontal line.

JAMES R. BRUSSELBACK
Enforcement Chief