

ORDER SUMMARY – Case Number: C-11-0605

Name(s): Gregory K. Vogel and Sandy J. Vogel

Order Number: C-11-0605-12-FO01

Effective Date: November 29, 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Or NMLS Identifier [U/L] (Revoked, suspended, stayed, application denied or withdrawn)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: none

Not Apply Until: n/a

Not Eligible Until: n/a

Prohibition/Ban Until: November 29, 2017

Investigation Costs	\$1,051.20	Due: 12/29/12	Paid <input type="checkbox"/> Y <input checked="" type="checkbox"/> N	Date
Fine	\$15,000	Due: 12/29/12	Paid <input type="checkbox"/> Y <input checked="" type="checkbox"/> N	Date
Assessment(s)	\$0	Due	Paid <input type="checkbox"/> Y <input type="checkbox"/> N	Date
Restitution	\$5,250	Due: 12/29/12	Paid <input type="checkbox"/> Y <input checked="" 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 checked="" type="checkbox"/> N		
No. of Victims:		4		

Comments: _____



STATE OF WASHINGTON
DEPARTMENT OF FINANCIAL INSTITUTIONS

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

No.: C-11-0605-12-FO01

MAGNUS VOGEL PRESTON &
ASSOCIATES; GREGORY K. VOGEL, Owner;
SANDI J. VOGEL, Owner; DUSTIN R. VOGEL,
Loan Originator,

FINAL ORDER AS TO GREGORY K.
VOGEL AND SANDI J. VOGEL

Respondents.

I. DIRECTOR'S CONSIDERATION

A. Procedural History. This matter has come before the Director ("Director") of the Department of Financial Institutions of the State of Washington ("Department"), pursuant to RCW 34.05.440(2). On June 27, 2011, the Director, through his designee, Consumer Services Division Director Deborah Bortner, issued a Statement of Charges and Notice of Intention to Enter an Order to Cease and Desist, Prohibit from Industry, Impose Fine, Order Restitution, and Collect Investigation Fee ("Statement of Charges") against MAGNUS VOGEL PRESTON & ASSOCIATES, GREGORY K. VOGEL, SANDI J. VOGEL, and DUSTIN R. VOGEL (collectively, "Respondents"), pursuant to violations of the Washington Mortgage Broker Practices Act, Chapter 19.146 RCW (the "Act"). A copy of the Statement of Charges is attached and incorporated into this order by this reference. The Statement of Charges was accompanied by a cover letter dated June 27, 2011, a Notice of Opportunity to Defend and Opportunity for Hearing, and a blank Application for Adjudicative Hearing for each Respondent (collectively, "accompanying documents"). On June 27, 2011, the

1 Department served Respondents Gregory K. Vogel and Sandi Vogel with the Statement of Charges
2 and accompanying documents, sent by First-Class mail and Federal Express overnight delivery.

3 On July 14 and 15, 2011, the Department received Applications for Adjudicative Hearing
4 from Respondents Gregory K. Vogel and Sandi J. Vogel. On September 27, 2011, the Department
5 made a request to the Office of Administrative Hearings (“OAH”) to assign an Administrative Law
6 Judge (“ALJ”) to schedule and conduct a hearing on the Statement of Charges.

7 On October 14, 2011, Administrative Law Judge Thomas P. Rack (“ALJ Rack”) issued a
8 Notice of Prehearing Conference scheduling a prehearing conference on October 31, 2011, at 2:00
9 p.m. On October 25, 2011, OAH issued an Amended Notice of Prehearing Conference rescheduling
10 the prehearing conference for November 28, 2011, at 10:00 a.m. On October 31, 2011, OAH issued a
11 Notice of Prehearing Conference rescheduling the prehearing conference to December 1, 2011.

12 On December 1, 2011, representatives for the Department and for Respondents Gregory K.
13 Vogel and Sandi J. Vogel attended a telephonic prehearing conference following which ALJ Rack
14 issued a Notice of Hearing and Order Following Prehearing Conference of December 1, 2011,
15 scheduling a hearing for May 7-9, 2012. On May 4, 2012, based upon Respondent Gregory K.
16 Vogel’s ongoing bankruptcy action, ALJ Rack issued an Order and Notice: Postponing all Case
17 Activities and Setting Status Conference rescheduling a Prehearing Conference for July 23, 2012, at
18 10:00 a.m. On May 18, 2012, OAH issued a notice reassigning the case to ALJ Terry A. Schuh
19 (“ALJ Schuh”) and scheduling a Status Conference for August 6, 2012, at 9:00 a.m. The notice of
20 the Status Conference contained the following language, “**You must participate in the conference.**

21 **If you do not, a default may be entered. This means you lose the opportunity to further**
22 **challenge the agency action.”** On August 6, 2012, the status conference was convened by ALJ
23 Schuh at 9:00 a.m. Respondents failed to appear and the Department moved for an order of default
24 dismissing the administrative appeal. On August 8, 2012, ALJ Schuh issued an Initial Order of

1 Default Dismissing Respondents' Appeal for Failure to Appear ("Order of Default") dismissing
2 Respondent's administrative appeal, and caused the Order of Default to be sent to Respondents via
3 First-Class mail.

4 Pursuant to RCW 34.05.440(3), Respondents had seven (7) days from the date of service of
5 the Order of Default to file a written motion with OAH requesting that the Order of Default be
6 vacated, and stating the grounds relied upon. Respondents did not make a request to vacate during
7 the statutory period.

8 Pursuant to RCW 34.05.464 and WAC 10-08-211, Respondents had twenty (20) days from
9 the date of service of the Order of Default to file a Petition for Review of the Order of Default.
10 Respondents did not file a Petition for Review during the statutory period.

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

- 13 1. Statement of Charges, cover letter dated June 27, 2011, and Notice of Opportunity
14 to Defend and Opportunity for Hearing, with documentation of service.
- 15 2. Applications for Adjudicative Hearing for Gregory K. Vogel and Sandi J. Vogel.
- 16 3. Request to OAH for Assignment of Administrative Law Judge.
- 17 4. Notice of Prehearing Conference dated October 14, 2011, with documentation of
18 service.
- 19 5. Amended Notice of Prehearing Conference dated October 25, 2011, with
20 documentation of service.
- 21 6. Notice of Prehearing Conference dated October 31, 2011, with documentation of
22 service.
- 23 7. Notice of Hearing and Order Following Prehearing Conference of December 1,
24 2011, dated December 1, 2011, with documentation of service.
8. Order and Notice: Postponing all Case Activities and Setting Status Conference
dated May 4, 2012, with documentation of service.

1 9. Notice Reassigning Administrative Law Judge and scheduling Status Conference
2 dated May 18, 2012, with documentation of service.

3 10. Initial Order of Default Dismissing Respondents' Appeal for Failure to Appear
4 dated August 8, 2012, with documentation of service.

5 C. Factual Findings and Grounds for Order. Pursuant to RCW 34.05.440(2), the Director
6 hereby adopts the Statement of Charges, which is attached hereto.

7 II. FINAL ORDER

8 Based upon the foregoing, and the Director having considered the record and being otherwise
9 fully advised, NOW, THEREFORE:

10 A. IT IS HEREBY ORDERED, That:

- 11 1. Respondents GREGORY K. VOGEL and SANDI J. VOGEL cease and desist offering
12 loan modification services or otherwise conducting the business of a mortgage broker
13 or loan originator in the State of Washington;
- 14 2. Respondents GREGORY K. VOGEL and SANDI J. VOGEL are prohibited from
15 participation in the conduct of the affairs of any mortgage broker subject to licensure
16 by the Director, in any manner, for a period of five (5) years;
- 17 3. Respondents GREGORY K. VOGEL and SANDI J. VOGEL shall, jointly and
18 severally, pay a fine to the Washington State Department of Financial Institutions in
19 the amount of Fifteen Thousand Dollars (\$15,000.00);
- 20 4. Respondents GREGORY K. VOGEL and SANDI J. VOGEL shall, jointly and
21 severally, pay restitution of all fees or monies collected from consumers for the
22 unlawful conduct set forth in the Statement of Charges, including, without limitation,
23 the fees or monies received from the consumers identified in paragraph 1.2 of the
24 Statement of Charges in the amounts also set forth therein;
5. Respondents GREGORY K. VOGEL and SANDI J. VOGEL shall, jointly and
severally, pay to the Washington State Department of Financial Institutions an
investigation fee in the amount of One Thousand Fifty-One Dollars and Twenty Cents
(\$1,051.20); and
6. Respondents GREGORY K. VOGEL and SANDI J. VOGEL shall maintain records in
compliance with the Act, and provide the Washington State Department of Financial
Institutions with the location of the books, records and other information relating to
the business of Respondent MAGNUS VOGEL PRESTON & ASSOCIATES, and the
name, address and telephone number of the individual responsible for maintenance of
such records, in compliance with the Act.

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

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

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

15 D. Judicial Review. Respondents Gregory K. Vogel and Sandi J. Vogel have the right to
16 petition the superior court for judicial review of this agency action under the provisions of chapter
17 34.05 RCW. For the requirements for filing a Petition for Judicial Review, see RCW 34.05.510 and
18 sections following.

19 E. Non-compliance with Order. If you do not comply with the terms of this order, the
20 Department may seek its enforcement by the Office of the Attorney General to include the collection
21 of the fine, fee, and restitution imposed herein. The Department also may assign the amounts owed
22 to a collection agency for collection.
23

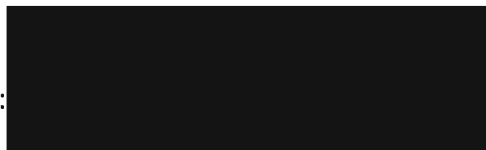
1 F. Service. For purposes of filing a Petition for Reconsideration or a Petition for Judicial
2 Review, service is effective upon deposit of this order in the U.S. mail, declaration of service
3 attached hereto.

4 DATED this 19th day of November, 2012



7 STATE OF WASHINGTON
8 DEPARTMENT OF FINANCIAL INSTITUTIONS

9 By:



10 SCOTT JARVIS
11 Director

**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-11-0605-11-SC01

MAGNUS VOGEL PRESTON & ASSOCIATES; GREGORY K. VOGEL, Owner; SANDI J. VOGEL, Owner; DUSTIN R. VOGEL, Loan Originator,

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

Respondents.

INTRODUCTION

Pursuant to RCW 19.146.220 and RCW 19.146.223, the Director of the Department of Financial Institutions of the State of Washington (Director) is responsible for the administration of chapter 19.146 RCW, the Mortgage Broker Practices (Act)¹. After having conducted an investigation pursuant to 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. **Magnus Vogel Preston & Associates (Respondent Magnus Vogel Preston)** is located at 9623 32nd St. SE, Ste. A101, Everett, Washington, 98025. Respondent Magnus Vogel Preston has never been licensed to conduct the business of a Mortgage Broker by the Department of Financial Institutions.

//

¹ RCW 19.146 (2006)

1 B. **Gregory K. Vogel (Respondent Gregory Vogel)** is an owner of Respondent
2 Magnus Vogel Preston. Respondent Gregory Vogel was licensed by the Department to conduct
3 business as loan originator on or around August 8, 2007, and continued to be licensed until his license
4 expired on December 31, 2007.

5 C. **Sandi J. Vogel (Respondent Sandi Vogel)** is an owner of Respondent Magnus Vogel
6 Preston. Respondent Sandi Vogel has never been licensed to conduct the business of a Mortgage
7 Broker or Loan Originator by the Department.

8 D. **Dustin R. Vogel (Respondent Dustin Vogel)** is a loan originator for Respondent
9 Magnus Vogel Preston. Respondent Dustin Vogel has never been licensed to conduct the business of
10 a Mortgage Broker or Loan Originator by the Department.

11 **1.2 Unlicensed Activity.** Between at least in or around May 2010, and the date of this Statement
12 of Charges, Respondents held themselves out as able to assist at least four consumers in applying to
13 obtain a loan modification on property located in the state of Washington. The consumers involved
14 in these loan modifications paid advance fees to Respondents totaling at least \$5,250 as follows:

Consumer 1 [REDACTED]	\$1,500
Consumer 2 [REDACTED]	\$1,500
Consumer 3 [REDACTED]	\$1,500
Consumer 4 [REDACTED]	\$750

19 **1.3 Misrepresentations and Omissions.** Respondents solicited the consumers listed above via
20 email or telephone to sign up for loan modification services. Respondents' "retainer commitment,"
21 sent to at least two of these consumers, stated "(y)our file has been approved for a loan modification
22 program." Respondents' "Policy of Refund Guarantee," provided to at least two of these consumers,
23 guaranteed a full refund if Respondents were unable to provide a loan modification for the

1 consumers. None of these consumers obtained a loan modification after paying an advance fee to
2 Respondents. Respondents did not provide refunds of the advance fees to any of these consumers.

3 **1.3 Failure to Fully and Timely Comply with Director's Authority.** On or around August 27,
4 2010, the Department served a directive, addressed to Respondent Magnus Vogel Preston, on
5 Respondents, requesting certain documents and information more specifically set forth therein. A
6 response was due on or before September 11, 2010². Respondents did not respond to the directive.
7 On or around September 20, 2010, the Department served a subpoena, addressed to Respondent
8 Magnus Vogel Preston, on Respondents, requiring a response to the earlier directive served on or
9 around August 27, 2010; this response was due on or before October 10, 2010³. Respondents did not
10 respond to the Department's subpoena.

11 On or around February 23, 2011, the Department sought enforcement of the September 30,
12 2010, subpoena by the Office of the Attorney General of Washington. On or about March 21, 2010,
13 the assigned Assistant Attorney General sent a letter to Respondents notifying Respondents that legal
14 action would be commenced unless Respondents provided the materials responsive to the subpoena
15 on or before April 15, 2011. The Department received a partial response to the subpoena on or
16 around April 11, 2011.

17 As part of the response, Respondents acknowledged the requirements to obtain a license to
18 operate as a Mortgage Broker or a Loan Originator. Respondents also agreed to cease and desist
19 operating as Mortgage Brokers or Loan Originators until such time as they obtained the appropriate
20

21 ² The directive required Respondents to respond "no later than fifteen days following the date of (the) directive." The directive was
22 dated August 27, 2010. The due date was thus September 11, 2010, a Saturday. To be timely, a response would have to be received by
the close of business on the following business day: September 13, 2010.

23 ³ The subpoena required Respondents to respond "no later than ten days following the date of (the) subpoena." The subpoena was
dated September 30, 2010. The due date was thus October 10, 2010, a Sunday. To be timely, a response would have to be received by
the close of business on the following business day: October 11, 2010.

1 licenses from the Department. Respondents also submitted a Claim of Non-Applicability form
2 indicating that their conduct did not require licensure by the Department.

3 **1.3 On-Going Investigation.** The Department's investigation into the alleged violations of the
4 Act by Respondents continues to date.

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

6 **2.1 Definition of Mortgage Broker.** Pursuant to RCW 19.146.010(14) and WAC 208-660-
7 010(29), "Mortgage Broker" means any person who, for compensation or gain, or in the expectation
8 of compensation or gain (a) makes a residential mortgage loan or assists a person in obtaining or
9 applying to obtain a residential mortgage loan or (b) holds himself or herself out as being able to
10 make a residential mortgage loan or assist a person in obtaining or applying to obtain a residential
11 mortgage loan.

12 **2.2 Definition of Loan Originator.** Pursuant to RCW 19.146.010(11)(a), "Loan originator"
13 means a natural person who for direct or indirect compensation or gain, or in the expectation of direct
14 or indirect compensation or gain (i) takes a residential mortgage loan application for a mortgage
15 broker, or (ii) offers or negotiates terms of a mortgage loan. "Loan originator" also includes a person
16 who holds themselves out to the public as able to perform any of these activities. "Loan originator"
17 does not mean persons performing purely administrative or clerical tasks for a mortgage broker. For
18 the purposes of this subsection, "administrative or clerical tasks" means the receipt, collection, and
19 distribution of information common for the processing of a loan in the mortgage industry and
20 communication with a borrower to obtain information necessary for the processing of a loan. A
21 person who holds himself or herself out to the public as able to obtain a loan is not performing
22 administrative or clerical tasks.

1 **2.3 Requirement to Obtain and Maintain License.** Based on the Factual Allegations set forth
2 in Section I above, Respondents are in apparent violation of RCW 19.146.0201(2) and (3) and RCW
3 19.146.200 for engaging in the business of a mortgage broker or loan originator without first
4 obtaining and maintaining a license under the Act. Individuals or entities negotiating residential
5 mortgage loan terms act as mortgage brokers or loan originators and must be licensed under the Act
6 unless specifically exempt from the Act.

7 **2.4 Prohibited Acts.** Based on the Factual Allegations set forth in Section I above, Respondents
8 are in apparent violation of RCW 19.146.0201(1), (2), and (3) for directly or indirectly employing a
9 scheme, device or artifice to defraud or mislead borrowers or lenders or any person, engaging in an
10 unfair or deceptive practice toward any person, or obtaining property by fraud or misrepresentation.

11 **2.5 Requirement to Comply with Director's Authority:** Based on the Factual Allegations set
12 forth in Section I above, Respondents are in apparent violation of RCW 19.146.235 for failing to
13 fully and timely respond to Department directives and subpoenas. Pursuant to RCW 19.146.235(2)(b)
14 and (c), for the purpose of investigating violations arising from the Act, the Director may, at any
15 time, either personally or by designee, may subpoena the books, accounts, records, files, and any
16 other documents the Director or designated person deems relevant to the inquiry, of every licensee
17 and of every other person engaged in the business of mortgage brokering, whether such a person acts
18 or claims to act under, or without the authority of, this chapter. Pursuant to RCW 19.146.235(9)(a),
19 no person subject to investigation under the Act may knowingly withhold any books, records, or
20 other information.

21 III. AUTHORITY TO IMPOSE SANCTIONS

22 **3.1 Authority to Issue an Order to Cease and Desist.** Pursuant to RCW 19.146.220(4), the
23 Director may issue orders directing a licensee, its employee or loan originator, or other person subject

1 to the Act to cease and desist from conducting business in a manner that is injurious to the public or
2 violates any provision of the Act.

3 **3.2 Authority to Prohibit from the Industry.** Pursuant to RCW 19.146.220(5)(a) and (d), the
4 Director may issue orders removing from office or prohibiting from participation in the conduct of
5 the affairs of a licensed mortgage broker, or both, any officer, principal, employee, or loan originator
6 of any licensed mortgage broker or any person subject to licensing under the Act for any violation of
7 RCW 19.146.0201(1) through (9), or RCW 19.146.200, or failure to comply with a directive or order
8 of the Director.

9 **3.3 Authority to Impose Fine.** Pursuant to RCW 19.146.220(2) and (3) and WAC 208-660-530,
10 the Director may impose fines on a licensee, employee or loan originator of the licensee, or other
11 person subject to the Act for any violations of the Act, or any violations of RCW 19.146.0201(1)
12 through (9), or RCW 19.146.200, or failure to comply with a directive or order of the Director.

13 **3.4 Authority to Order Restitution.** Pursuant to RCW 19.146.220(2), the Director may issue
14 orders directing a licensee or other person subject to the Act to pay restitution.

15 **3.5 Authority to Collect Investigation Fee.** Pursuant to RCW 19.146.228(2), WAC 208-660-
16 550(4) and WAC 208-660-520(9), upon completion of any investigation of the books and records of a
17 licensee or other person subject to the Act, the Department will furnish to the licensee or other person
18 subject to the Act a billing to cover the cost of the investigation. The investigation charge will be
19 calculated at the rate of forty-eight dollars (\$48) per hour that each staff person devoted to the
20 investigation.

21 //

22 //

23 //

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

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

6 **4.1** Respondents Magnus Vogel Preston & Associates and Gregory K. Vogel, Sandi J. Vogel, and
7 Dustin R. Vogel cease and desist offering loan modification services or otherwise conducting the
8 business of a mortgage broker or loan originator in the state of Washington;

8 **4.2** Respondents Magnus Vogel Preston & Associates and Gregory K. Vogel, Sandi J. Vogel, and
9 Dustin R. Vogel be prohibited from participation in the conduct of the affairs of any mortgage broker
10 or consumer loan company subject to licensure by the Director, in any manner, for a period of five
11 (5) years;

11 **4.3** Respondents Magnus Vogel Preston & Associates and Gregory K. Vogel, Sandi J. Vogel, and
12 Dustin R. Vogel jointly and severally pay a fine which as of the date of this Statement of Charges
13 totals \$15,000;

13 **4.4** Respondents Magnus Vogel Preston & Associates and Gregory K. Vogel, Sandi J. Vogel, and
14 Dustin R. Vogel jointly and severally pay restitution of all fees or monies collected from at least the
15 consumers referenced in paragraph 1.2 above;

15 **4.5** Respondents Magnus Vogel Preston & Associates and Gregory K. Vogel, Sandi J. Vogel, and
16 Dustin R. Vogel jointly and severally pay an investigation fee which as of the date of this Statement
17 of Charges totals \$1,051.20, calculated at \$48 per hour for the twenty-one and nine-tenths (21.9) staff
18 hours devoted to the investigation; and

17 **4.6** Respondents Magnus Vogel Preston & Associates and Gregory K. Vogel, Sandi J. Vogel, and
18 Dustin R. Vogel, maintain records in compliance with the Act, and provide the Department with the
19 location of the books, records and other information relating to Respondent Magnus Vogel Preston's
20 business, and the name, address and telephone number of the individual responsible for maintenance
21 of such records in compliance with the Act.

20 //

21 //

22 //

23 //

1 **V. AUTHORITY AND PROCEDURE**

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

9
10 Dated this 27th day of June, 2011



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

17 Presented by:



18 MARISA E. BROGDEL
19 Financial Legal Examiner

20 Approved by:



21 JAMES R. BRUSSELBACK
22 Enforcement Chief

