

ORDER SUMMARY – Case Number: C-12-0931

Name(s): Matt E. Moskos

Order Number: C-12-0931-13-CO01

Effective Date: January 21, 2014

License Number: UL

Or NMLS Identifier [U/L] (Revoked, suspended, stayed, application denied or withdrawn)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: January 21, 2024

Not Eligible Until: January 21, 2024

Prohibition/Ban Until: January 21, 2024

Investigation Costs	\$804	Due	Paid <input checked="" type="checkbox"/> Y <input type="checkbox"/> N	Date 1/14/2014
Fine	\$	Due	Paid <input type="checkbox"/> Y <input 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	\$	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:

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

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

7 INTEGRITY MORTGAGE AND CREDIT
8 SOLUTIONS, INC.,
9 LISA M. MORGAN, Principal, and
10 MATT E. MOSKOS, Principal,

11 Respondents.

No.: C-12-0931-13-CO01

12 CONSENT ORDER AS TO
13 MATT E. MOSKOS

14 COMES NOW the Director of the Department of Financial Institutions (Director), through his
15 designee Deborah Bortner, Division Director, Division of Consumer Services, and Matt E. Moskoss
16 (Respondent Moskoss), and finding that the issues raised in the above-captioned matter may be
17 economically and efficiently settled solely as they relate to Respondent Moskoss, agree to the entry of
18 this Consent Order. This Consent Order is entered pursuant to chapter 19.146 of the Revised Code of
19 Washington (RCW), and RCW 34.05.060 of the Administrative Procedure Act, based on the
20 following:

21 **AGREEMENT AND ORDER**

22 The Department of Financial Institutions, Division of Consumer Services (Department) and
23 Respondent Moskoss have agreed upon a basis for resolution of the matters alleged in Statement of
24 Charges No. C-12-0931-13-SC01 (Statement of Charges), entered March 25, 2013, (copy attached
hereto) solely as they relate to Respondent Moskoss. Pursuant to chapter 19.146 RCW, the Mortgage
Broker Practices Act (Act) and RCW 34.05.060 of the Administrative Procedure Act, Respondent
Moskoss 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

1 this Consent Order solely as they relate to Respondent Moskos. The parties intend this Consent
2 Order to fully resolve the Statement of Charges solely as it relates to Respondent Moskos.

3 Based upon the foregoing:

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

6 **B. Waiver of Hearing.** It is AGREED that Respondent Moskos has been informed of the
7 right to a hearing before an administrative law judge, and hereby waives his right to a hearing and
8 any and all administrative and judicial review of the issues raised in this matter, or of the resolution
9 reached herein. Accordingly, Respondent Moskos, by his signature below, withdraws his appeal to
10 the Office of Administrative Hearings.

11 **C. No Admission of Liability.** The parties intend this Consent Order to fully resolve the
12 Statement of Charges and agree that Respondent Moskos does not admit to any wrongdoing by its
13 entry.

14 **D. Cease and Desist.** It is AGREED that Respondent Moskos shall cease and desist from
15 conducting the business of a mortgage broker or loan originator in the state of Washington.

16 **E. Prohibition from Industry.** It is AGREED that, for a period of ten (10) years from the
17 date of entry of this Consent Order, Respondent Moskos is prohibited from participating in the
18 conduct of the affairs of any mortgage broker licensed by the Department or subject to licensure or
19 regulation by the Department, in any capacity.

20 **F. Investigation Fee.** It is AGREED that Respondent Moskos shall pay to the Department
21 an investigation fee of \$804, in the form of a cashier's check made payable to the "Washington State
22 Treasurer," upon entry of this Consent Order.

23 **G. Non-Compliance with Order.** It is AGREED that Respondent Moskos understands that
24 failure to abide by the terms and conditions of this Consent Order may result in further legal action

1 by the Director. In the event of such legal action, Respondent Moskos may be responsible to
2 reimburse the Director for the cost incurred in pursuing such action, including but not limited to,
3 attorney fees.

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

6 **I. Completely Read, Understood, and Agreed.** It is AGREED that Respondent Moskos
7 has read this Consent Order in its entirety and fully understands and agrees to all of the same.

8 **RESPONDENT:**

9 [Redacted]
10 Matt E. Moskos

Date 1/9/2014

11 _____
12 Seth A. Rosenberg, WSBA No. 41660
13 Attorney for Respondent

Date

DO NOT WRITE BELOW THIS LINE

14
15 THIS ORDER ENTERED THIS 9th DAY OF January, 2013. ^{4 DB}

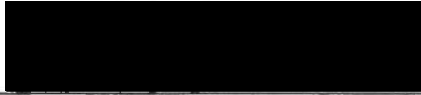


16 [Redacted]
17 _____
18 DEBORAH BORTNER
19 Director
20 Division of Consumer Services
21 Department of Financial Institutions

21 Presented by:
22 [Redacted]
23 KENNETH J. SUGIMOTO
24 Financial Legal Examiner

RECEIVED

1 Approved by:



3 CHARLES E. CLARK
Enforcement Chief

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

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

5 INTEGRITY MORTGAGE AND CREDIT
SOLUTIONS, INC.,
6 LISA M. MORGAN, Principal, and
MATT E. MOSKOS, Principal.

7 Respondents.

No. C-12-0931-13-SC01

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

8 INTRODUCTION

9 Pursuant to RCW 19.146.220 and RCW 19.146.223, the Director of the Department of Financial
10 Institutions of the State of Washington (Director) is responsible for the administration of chapter
11 19.146 RCW, the Mortgage Broker Practices (Act). After having conducted an investigation pursuant
12 to RCW 19.146.235, and based upon the facts available as of the date of this Statement of Charges, the
13 Director, through his designee, Division of Consumer Services Director Deborah Bortner, institutes
14 this proceeding and finds as follows:

15 I. FACTUAL ALLEGATIONS

16 1.1 Respondents.

17 A. Integrity Mortgage and Credit Solutions, Inc. (Respondent Integrity) has never been
18 licensed by the Department of Financial Institutions of the State of Washington (Department) to
19 conduct business as a mortgage broker or loan originator.

20 B. Lisa M. Morgan (Respondent Morgan) is a principal of Respondent Integrity. During
21 the relevant time period, Respondent Morgan was not licensed by the Department to conduct business
22 as a mortgage broker or loan originator.

1 **C. Matt E. Moskos (Respondent Moskos)** is a principal of Respondent Integrity. During the
2 relevant time period, Respondent Moskos was not licensed by the Department to conduct business as a
3 mortgage broker or loan originator.

4 **1.2 Unlicensed Activity.** Between at least August 12, 2009, and the date of this Statement of
5 Charges, Respondents were offering residential mortgage loan modification services to Washington
6 consumers on property located in Washington State. Respondents entered into a contractual
7 relationship with at least 13 Washington consumers to provide those services and collected an advance
8 fee for the provision of those services. The Department has received at least one complaint from a
9 Washington consumer alleging Respondents provided or offered to provide residential mortgage loan
10 modification services while not licensed by the Department to provide those services. A list of
11 Washington consumers with whom Respondents conducted business as a mortgage broker or loan
12 originator, and the amount paid by each is appended hereto and incorporated herein by reference.

13 **1.3 Misrepresentations and Omissions.** Respondents represented that they were licensed to
14 provide the residential mortgage loan modification services or omitted disclosing that they were not
15 licensed to provide those services.

16 **1.4 On-Going Investigation.** The Department's investigation into the alleged violations of the
17 Act by Respondents continues to date.

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

19 **2.1 Mortgage Broker Defined.** Pursuant to RCW 19.146.010(14) and WAC 208-660-006,
20 "Mortgage Broker" means any person who, for compensation or gain, or in the expectation of
21 compensation or gain (a) assists a person in obtaining or applying to obtain a residential mortgage loan
22 or (b) holds himself or herself out as being able to make a residential mortgage loan or assist a person
23 in obtaining or applying to obtain a residential mortgage loan. Pursuant to WAC 208-660-006, a
24

1 person ““assists a person in obtaining or applying to obtain a residential mortgage loan’ by, among
2 other things, counseling on loan terms (rates, fees, other costs), [and] preparing loan packages....”

3 **2.2 Loan Originator Defined.** Pursuant to RCW 19.146.010(11), “loan originator” means a
4 natural person who for direct or indirect compensation or gain, or in the expectation of direct or
5 indirect compensation or gain: takes a residential mortgage loan application for a mortgage broker;
6 offers or negotiates terms of a mortgage loan; or holds themselves out to the public as able to perform
7 any of these activities.

8 **2.3 Prohibited Acts.** Based on the Factual Allegations set forth in Section I above, Respondents
9 are in apparent violation of RCW 19.146.0201(2) & (3) for engaging in an unfair or deceptive practice
10 toward any person and obtaining property by fraud or misrepresentation.

11 **2.4 Requirement to Obtain and Maintain Mortgage Broker License.** Based on the Factual
12 Allegations set forth in Section I above, Respondents are in apparent violation of RCW 19.146.200(1)
13 for engaging in the business of a mortgage broker for Washington residents or property without first
14 obtaining a license to do so.

15 **2.5 Requirement to Obtain and Maintain Loan Originator License.** Based on the Factual
16 Allegations set forth in Section I above, Respondents are in apparent violation of RCW 19.146.200(1)
17 for engaging in the business of a loan originator without first obtaining and maintaining a license.

18 **2.6 Requirement to Maintain Accurate and Current Books and Records.** Pursuant to RCW
19 19.146.060 and WAC 208-660-450, Respondents are required to keep all books and records in a
20 location that is on file with and readily available to the Department until at least twenty-five months
21 have elapsed following the effective period to which the books and records relate.

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1 **III. AUTHORITY TO IMPOSE SANCTIONS**

2 **3.1 Authority to Issue an Order to Cease and Desist.** Pursuant to RCW 19.146.220(4), the
3 Director may issue orders directing any person subject to the Act to cease and desist from conducting
4 business.

5 **3.2 Authority to Prohibit from Industry.** Pursuant to RCW 19.146.220(5), the Director may
6 issue orders prohibiting from participation in the conduct of the affairs of a licensed mortgage broker
7 any person subject to licensing under the Act for any violation of RCW 19.146.0201(1) through (9) or
8 (13), or RCW 19.146.200.

9 **3.3 Authority to Order Restitution.** Pursuant to RCW 19.146.220(2), the Director may order
10 restitution against any person subject to the Act for any violation of the Act.

11 **3.4 Authority to Impose Fine.** Pursuant to RCW 19.146.220(2), the Director may impose fines
12 against any person subject to the Act for any violation of the Act.

13 **3.5 Authority to Collect Investigation Fee.** Pursuant to RCW 19.146.228(2), and WAC 208-
14 660-550(4)(a), the Department will charge forty-eight dollars per hour for an examiner’s time devoted
15 to an investigation of any person subject to the Act.

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

17 Respondents’ violations of the provisions of chapter 19.146 RCW and chapter 208-660 WAC, as
18 set forth above constitute a basis for the entry of an Order under RCW 19.146.220, RCW 19.146.221,
19 and RCW 19.146.223. Therefore, it is the Director’s intent to ORDER that:

20 **4.1** Respondents Integrity Mortgage and Credit Solutions, Inc., Lisa M. Morgan, and Matt E.
21 Moskos cease and desist engaging in the business of a mortgage broker or loan originator.

22 **4.2** Respondents Integrity Mortgage and Credit Solutions, Inc., Lisa M. Morgan, and Matt E.
23 Moskos be prohibited from participation, in any manner, in the conduct of the affairs of any
mortgage broker subject to licensure by the Director for a period of five years.

24 **4.3** Respondents Integrity Mortgage and Credit Solutions, Inc., Lisa M. Morgan, and Matt E.
Moskos jointly and severally pay restitution to the consumers identified by the Department in

1 paragraph 1.2 in the amount set forth therein, and that Respondents Integrity Mortgage and
2 Credit Solutions, Inc., Lisa M. Morgan, and Matt E. Moskos jointly and severally pay
3 restitution to each Washington consumer with whom they entered into a contract for residential
4 mortgage loan modification services related to real property or consumers located in the state
5 of Washington equal to the amount collected from that Washington consumer for those
6 services in an amount to be determined at hearing.

7 **4.4** Respondents Integrity Mortgage and Credit Solutions, Inc., Lisa M. Morgan, and Matt E.
8 Moskos jointly and severally pay a fine, which as of the date of this Statement of Charges
9 totals \$39,000.

10 **4.5** Respondents Integrity Mortgage and Credit Solutions, Inc., Lisa M. Morgan, and Matt E.
11 Moskos jointly and severally pay an investigation fee, which as of the date of this Statement of
12 Charges totals \$912.

13 **4.6** Respondents Integrity Mortgage and Credit Solutions, Inc., Lisa M. Morgan, and Matt E.
14 Moskos maintain records in compliance with the Act and provide the Department with the
15 location of the books, records and other information relating to Respondents Integrity
16 Mortgage and Credit Solutions, Inc., Lisa M. Morgan, and Matt E. Moskos's provision of
17 residential mortgage loan modification services in Washington, and the name, address and
18 telephone number of the individual responsible for maintenance of such records in compliance
19 with the Act.

20 **V. AUTHORITY AND PROCEDURE**

21 This Statement of Charges is entered pursuant to the provisions of RCW 19.146.220, RCW
22 19.146.221, RCW 19.146.223, and RCW 19.146.230, and is subject to the provisions of chapter 34.05
23 RCW (The Administrative Procedure Act). Respondents may make a written request for a hearing as
24 set forth in the NOTICE OF OPPORTUNITY TO DEFEND AND OPPORTUNITY FOR HEARING
accompanying this Statement of Charges.

Dated this 25th day of March, 2013.

/s/ _____
DEBORAH BORTNER
Director, Division of Consumer Services
Department of Financial Institutions

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Presented by:

/s/
KENNETH J. SUGIMOTO
Financial Legal Examiner

Approved by:

/s/
CHARLES E. CLARK
Enforcement Chief

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APPENDIX – RESTITUTION

Borrower	Amount
B.B.	\$ 1,525.00
C.B.	\$ 1,125.00
S.B.	\$ 1,800.00
B.D.	\$ 600.00
H.H.	\$ 600.00
J.H.	\$ 2,250.00
J.H.	\$ 135.06
C.L.	\$ 1,260.44
J.M.	\$ 2,250.00
R.R.	\$ 1,800.00
T.R.	\$ 1,800.00
B.T.	\$ 1,445.15
M.W.	\$ 2,800.00
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Total:	\$ 19,390.65