

**ORDER SUMMARY – Case Number: C-12-1094**

**Name(s):** National Help Center Law Group d/b/a NHC Law Group  
Richard Khachatourian

**Order Number:** C-12-1094-13-FO01

**Effective Date:** June 10, 2013

**License Number:** Unlicensed  
**Or NMLS Identifier [U/L]** (Revoked, suspended, stayed, application denied or withdrawn)  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:** June 10, 2018

**Not Eligible Until:** June 10, 2018

**Prohibition/Ban Until:** June 10, 2018

<b>Investigation Costs</b>	\$768	Due	Paid <input type="checkbox"/> Y <input checked="" type="checkbox"/> N	Date
<b>Fine</b>	\$3,000	Due	Paid <input type="checkbox"/> Y <input checked="" type="checkbox"/> N	Date
<b>Assessment(s)</b>	\$	Due	Paid <input type="checkbox"/> Y <input type="checkbox"/> N	Date
<b>Restitution</b>	\$8,500	Due	Paid <input type="checkbox"/> Y <input checked="" type="checkbox"/> N	Date
<b>Judgment</b>	\$	Due	Paid <input type="checkbox"/> Y <input type="checkbox"/> N	Date
<b>Satisfaction of Judgment Filed?</b>		<input type="checkbox"/> Y <input checked="" type="checkbox"/> N		
No. of Victims:		One (1)		

Comments: Respondents must also cease and desist from engaging in mortgage broker activity, are prohibited from participating in the conduct of the affairs of any mortgage broker subject to licensure for a period of five (5) years, and must maintain records in accordance with MBPA.

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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:

NATIONAL HELP CENTER LAW GROUP,  
INC. D/B/A NHC LAW GROUP, and  
RICHARD KHACHATOURIAN, President,

Respondents.

No.: C-12-1094-13-FO01

FINAL ORDER REGARDING NATIONAL  
HELP CENTER LAW GROUP D/B/A NHC  
LAW GROUP AND RICHARD  
KHACHATOURIAN

I. DIRECTOR'S CONSIDERATION

A. Default. This matter has come before the Director of the Department of Financial Institutions of the State of Washington (Director), through his designee, Consumer Services Division Director Deborah Bortner (Director's designee), pursuant to RCW 34.05.440(1). On March 28, 2013, the Director, through the Director's designee, issued a Statement of Charges and Notice of Intention to Enter an Order to Cease and Desist Business, Prohibit From Industry, Order Restitution, Impose Fine, and Collect Investigation Fee (Statement of Charges) against National Help Center Law Group d/b/a NHC Law Group and Richard Khachatourian (Respondents). 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 April 17, 2013, a Notice of Opportunity to Defend and Opportunity for Hearing, and a blank Application for Adjudicative Hearing for Respondents (collectively, accompanying documents).

On April 24, 2013, the Department served Respondents National Help Center Law Group d/b/a NHC Law Group and Richard Khachatourian with the Statement of Charges and accompanying documents by First-Class mail and Federal Express overnight delivery. On April 25, 2013, the

1 documents sent by Federal Express overnight delivery were delivered. The documents sent by First-  
2 Class mail were not returned to the Department by the United States Postal Service.

3 Respondents National Help Center Law Group d/b/a NHC Law Group and Richard  
4 Khachatourian did not request an adjudicative hearing within twenty calendar days after the  
5 Department served the Notice of Opportunity to Defend and Opportunity for Hearing, as provided for  
6 in WAC 208-08-050(2).

7 B. Record Presented. The record presented to the Director's designee for her review and  
8 for entry of a final decision included the Statement of Charges, cover letter dated April 17, 2013,  
9 Notice of Opportunity to Defend and Opportunity for Hearing, and blank Applications for  
10 Adjudicative Hearing for Respondents, with documentation for service.

11 C. Factual Findings and Grounds for Order. Pursuant to RCW 34.05.440(1), the  
12 Director's designee hereby adopts the Statement of Charges, which is attached hereto.

## 13 II. FINAL ORDER

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

16 A. IT IS HEREBY ORDERED, That:

- 17 1. Respondents National Help Center Law Group d/b/a NHC Law Group and Richard  
18 Khachatourian cease and desist engaging in the business of a mortgage broker or  
loan originator.
- 19 2. Respondents National Help Center Law Group d/b/a NHC Law Group and Richard  
20 Khachatourian are prohibited from participation in the conduct of the affairs of any  
mortgage broker subject to licensure by the Director, in any manner, for a period  
21 of five (5) years.
- 22 3. Respondents National Help Center Law Group d/b/a NHC Law Group and Richard  
23 Khachatourian jointly and severally with each other pay \$8,500 in restitution to the  
consumers identified by the Department in Section 1.2 of the Statement of  
Charges.

- 1                   4. Respondents National Help Center Law Group d/b/a NHC Law Group and Richard  
2                   Khachatourian jointly and severally with each other pay a fine of \$3,000.
- 3                   5. Respondents National Help Center Law Group d/b/a NHC Law Group and Richard  
4                   Khachatourian jointly and severally with each other pay an investigation fee of  
5                   \$768.
- 6                   6. Respondents National Help Center Law Group d/b/a NHC Law Group and Richard  
7                   Khachatourian, its officers, employees, and agents maintain records in compliance  
8                   with Chapter 19.146 RCW, Mortgage Broker Practices Act (Act) and provide the  
9                   Director with the location of the books, records and other information relating to  
10                  Respondents National Help Center Law Group d/b/a NHC Law Group and Richard  
11                  Khachatourian business, and the name, address and telephone number of the  
12                  individual responsible for maintenance of such records in compliance with the Act.

13                  B.     Reconsideration. Pursuant to RCW 34.05.470, Respondents National Help Center  
14                  Law Group d/b/a NHC Law Group and Richard Khachatourian have the right to file a Petition for  
15                  Reconsideration stating the specific grounds upon which relief is requested. The Petition must be  
16                  filed in the Office of the Director of the Department of Financial Institutions by courier at 150 Israel  
17                  Road SW, Tumwater, Washington 98501, or by U.S. Mail at P.O. Box 41200, Olympia, Washington  
18                  98504-1200, within ten (10) days of service of the Final Order upon Respondents. The Petition for  
19                  Reconsideration shall not stay the effectiveness of this order nor is a Petition for Reconsideration a  
20                  prerequisite for seeking judicial review in this matter.

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

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

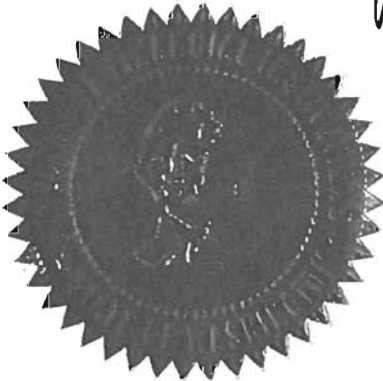
27                  D.     Judicial Review. Respondents National Help Center Law Group d/b/a NHC Law  
28                  Group and Richard Khachatourian have the right to petition the superior court for judicial review of

1 this agency action under the provisions of chapter 34.05 RCW. For the requirements for filing a  
2 Petition for Judicial Review, see RCW 34.05.510 and sections following.

3 E. Non-compliance with Order. If you do not comply with the terms of this order,  
4 **including payment of any amounts owed within 30 days of receipt of this order**, the Department  
5 may seek its enforcement by the Office of the Attorney General to include the collection of the fines,  
6 assessments, late penalties, fees, and restitution imposed herein. The Department also may assign the  
7 amounts owed to a collection agency for collection.

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

11 DATED this 10<sup>th</sup> day of June, 2013.



12 STATE OF WASHINGTON  
13 DEPARTMENT OF FINANCIAL INSTITUTIONS

14   
15 DEBORAH BORTNER  
16 Director  
17 Division of Consumer Services

**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:

NATIONAL HELP CENTER LAW GROUP, INC.  
D/B/A NHC LAW GROUP, and  
RICHARD KHACHATOURIAN, President,

Respondents.

No. C-12-1094-13-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

**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). 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. Respondent National Help Center Law Group, Inc. d/b/a NHC Law Group**  
**(Respondent NHC Law Group)** has never been licensed by the Department of Financial Institutions of the State of Washington (Department) to conduct business as a mortgage broker or loan originator.

**B. Respondent Richard Khachatourian (Respondent Khachatourian)** is the president of Respondent NHC Law Group. During the relevant time period, Respondent Khachatourian was not licensed by the Department to conduct business as a mortgage broker or loan originator.

**1.2 Unlicensed Activity.** Between at least July 29, 2011, and the date of the Statement of Charges, Respondents were offering residential mortgage loan modification services to Washington

1 consumers on property located in Washington State. Respondents entered into a contractual  
2 relationship with at least one Washington consumer to provide those services and collected an advance  
3 fee for the provision of those services. The Department has received at least one complaint from a  
4 Washington consumer alleging Respondents provided or offered to provide residential mortgage loan  
5 modification services while not licensed by the Department to provide those services. The consumer  
6 [REDACTED] paid Respondents a fee of \$8,500.

7 **1.3 Misrepresentations and Omissions.** Respondents represented that they were licensed to  
8 provide the residential mortgage loan modification services or omitted disclosing that they were not  
9 licensed to provide those services.

10 **1.4 On-Going Investigation.** The Department’s investigation into the alleged violations of the  
11 Act by Respondents continues to date.

## 12 II. GROUNDS FOR ENTRY OF ORDER

13 **2.1 Mortgage Broker Defined.** Pursuant to RCW 19.146.010(14) and WAC 208-660-006,  
14 “Mortgage Broker” means any person who, for compensation or gain, or in the expectation of  
15 compensation or gain (a) assists a person in obtaining or applying to obtain a residential mortgage loan  
16 or (b) holds himself or herself out as being able to make a residential mortgage loan or assist a person  
17 in obtaining or applying to obtain a residential mortgage loan. Pursuant to WAC 208-660-006, a  
18 person “‘assists a person in obtaining or applying to obtain a residential mortgage loan’ by, among  
19 other things, counseling on loan terms (rates, fees, other costs), [and] preparing loan packages....”

20 **2.2 Loan Originator Defined.** Pursuant to RCW 19.146.010(11), “loan originator” means a  
21 natural person who for direct or indirect compensation or gain, or in the expectation of direct or  
22 indirect compensation or gain: takes a residential mortgage loan application for a mortgage broker;  
23 offers or negotiates terms of a mortgage loan; or holds themselves out to the public as able to perform  
24 any of these activities.

1 **2.3 Prohibited Acts.** Based on the Factual Allegations set forth in Section I above, Respondents  
2 are in apparent violation of RCW 19.146.0201(2) & (3) for engaging in an unfair or deceptive practice  
3 toward any person and obtaining property by fraud or misrepresentation.

4 **2.4 Requirement to Obtain and Maintain Mortgage Broker License.** Based on the Factual  
5 Allegations set forth in Section I above, Respondents are in apparent violation of RCW 19.146.200(1)  
6 for engaging in the business of a mortgage broker for Washington residents or property without first  
7 obtaining a license to do so.

8 **2.5 Requirement to Obtain and Maintain Loan Originator License.** Based on the Factual  
9 Allegations set forth in Section I above, Respondents are in apparent violation of RCW 19.146.200(1)  
10 for engaging in the business of a loan originator without first obtaining and maintaining a license.

11 **2.6 Requirement to Maintain Accurate and Current Books and Records.** Pursuant to RCW  
12 19.146.060 and WAC 208-660-450, Respondents are required to keep all books and records in a  
13 location that is on file with and readily available to the Department until at least twenty-five months  
14 have elapsed following the effective period to which the books and records relate.

### 15 III. AUTHORITY TO IMPOSE SANCTIONS

16 **3.1 Authority to Issue an Order to Cease and Desist.** Pursuant to RCW 19.146.220(4), the  
17 Director may issue orders directing any person subject to the Act to cease and desist from conducting  
18 business.

19 **3.2 Authority to Prohibit from Industry.** Pursuant to RCW 19.146.220(5), the Director may  
20 issue orders prohibiting from participation in the conduct of the affairs of a licensed mortgage broker  
21 any person subject to licensing under the Act for any violation of RCW 19.146.0201(1) through (9) or  
22 (13), or RCW 19.146.200.

23 **3.3 Authority to Order Restitution.** Pursuant to RCW 19.146.220(2), the Director may order  
24 restitution against any person subject to the Act for any violation of the Act.



1 **3.4 Authority to Impose Fine.** Pursuant to RCW 19.146.220(2), the Director may impose fines  
2 against any person subject to the Act for any violation of the Act.

3 **3.5 Authority to Collect Investigation Fee.** Pursuant to RCW 19.146.228(2), and WAC 208-  
4 660-550(4)(a), the Department will charge forty-eight dollars per hour for an examiner's time devoted  
5 to an investigation of any person subject to the Act.

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

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

10 **4.1** Respondents cease and desist engaging in the business of a mortgage broker or loan originator.

11 **4.2** Respondents be prohibited from participation, in any manner, in the conduct of the affairs of  
12 any mortgage broker subject to licensure by the Director for a period of five (5) years.

13 **4.3** Respondents jointly and severally pay restitution to the consumers identified by the  
14 Department in paragraph 1.2 in the amount set forth therein, and that Respondents jointly and  
15 severally pay restitution to each Washington consumer with whom they entered into a contract  
for residential mortgage loan modification services related to real property or consumers  
located in the state of Washington equal to the amount collected from that Washington  
consumer for those services in an amount to be determined at hearing.

16 **4.4** Respondents jointly and severally pay a fine of \$3,000 for each residential loan modification  
17 transaction entered into with Washington consumers. As of the date of this Statement of  
Charges, the fine totals \$3,000.

18 **4.5** Respondents jointly and severally pay an investigation fee at the rate of \$48 per hour. As of  
19 the date of this Statement of Charges, the investigative fee totals \$768.

20 **4.6** Respondents maintain records in compliance with the Act and provide the Department with the  
21 location of the books, records and other information relating to Respondents' provision of  
residential mortgage loan modification services in Washington, and the name, address and  
22 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 is entered pursuant to the provisions of RCW 19.146.220, RCW  
3 19.146.221, RCW 19.146.223, and RCW 19.146.230, and is subject to the provisions of chapter 34.05  
4 RCW (The Administrative Procedure Act). Respondents may make a written request for a hearing as  
5 set forth in the NOTICE OF OPPORTUNITY TO DEFEND AND OPPORTUNITY FOR HEARING  
6 accompanying this Statement of Charges.

7  
8 Dated this 28th day of March, 2013.

9  
10 /S/  
11 DEBORAH BORTNER  
12 Director, Division of Consumer Services  
13 Department of Financial Institutions

14 Presented by:

15  
16 /S/  
17 BARBARA J. PENTTILA  
18 Financial Legal Examiner

19 Approved by:

20 /S/  
21 CHARLES E. CLARK  
22 Enforcement Chief