

TERMS COMPLETED

ORDER SUMMARY – Case Number: C-13-1290-13-CO01

Name(s): TRG Settlement Services, LLP d/b/a Convenient Closing Services

Order Number: C-13-1290-13-CO01

Effective Date: November 6, 2013

License Number: U/L

Or NMLS Identifier [U/L] (Revoked, suspended, stayed, application denied or withdrawn)

License Effect: n/a
If applicable, you must specifically note the ending dates of terms.

Not Apply Until: n/a

Not Eligible Until: n/a

Prohibition/Ban Until: n/a

Investigation Costs	\$1,315.20	Due	Paid <input checked="" type="checkbox"/> Y <input type="checkbox"/> N	Date Nov. 1, 2013
Fine	\$50,000	Due	Paid <input checked="" type="checkbox"/> Y <input type="checkbox"/> N	Date Nov. 1, 2013
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 **1.4** Respondent TRG did not have an escrow agent license issued by the Department during any
2 of the time in question or satisfy an exception to the licensure requirement.

3 **CONCLUSIONS OF LAW**

4 **2.1** Based on the Findings of Fact, Respondent TRG violated RCW 18.44.021 by engaging in the
5 business of an escrow agent without first obtaining and maintaining a license in accordance with the
6 Act or meeting an exclusion from the Act.

7 **AGREEMENT AND ORDER**

8 The Department and Respondent TRG have agreed upon a basis for resolution of the Findings
9 of Fact and Conclusions of Law identified in this Consent Order. Respondent TRG neither admits
10 nor denies any wrongdoing by the entry of the Consent Order, but agrees not to contest the Findings
11 of Fact and Conclusions of Law identified in this Consent Order. Pursuant to chapter 18.44 RCW, the
12 Escrow Agent Registration Act, and RCW 34.05.060 of the Administrative Procedure Act,
13 Respondent TRG hereby agrees to the Department's entry of this Consent Order and further agrees
14 that the issues raised in the above-captioned matter may be economically and efficiently settled by
15 entry of this Consent Order.

16 Based upon the foregoing:

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

19 **B. Waiver of Hearing.** It is AGREED that Respondent TRG hereby waives its right to a
20 hearing and any and all administrative and judicial review of the issues raised in this matter or the
21 resolution reached herein.

22 **C. Escrow Agent License Required.** It is AGREED that Respondent TRG understands that
23 in order to engage in the business of an escrow agent in the State of Washington, Respondent TRG

1 must obtain an escrow agent license in accordance with the Act or qualify for an exclusion from
2 licensing as delineated in the Act. It is further AGREED that Respondent TRG will not engage in the
3 business of an escrow agent in the State of Washington until such time as Respondent TRG obtains a
4 license in accordance with the Act or qualifies for an exclusion from licensing as delineated in the
5 Act.

6 **D. Fine.** It is AGREED that Respondent TRG shall pay a fine to the Department in the
7 amount of \$50,000, upon entry of this Consent Order.

8 **E. Investigation Fee.** It is AGREED that Respondent TRG shall pay to the Department an
9 investigation fee of \$1,315.20, upon entry of this Consent Order.

10 **F. Payment Method Of Fine and Investigation Fee.** It is AGREED that Respondent TRG
11 will submit the fine and investigation fee via wire transfer to the Department in the amount of
12 \$51,315.20. The fine and investigation fee may be paid together and are due upon entry of the
13 Consent Order, which will not be entered until funds have been received by the Department.

14 **G. Records Retention.** It is AGREED that Respondent TRG, its officers, employees, and
15 agents shall maintain records in compliance with the Act and provide the Director with the location
16 of the books, records and other information relating to Respondent TRG's escrow agent business, and
17 the name, address and telephone number of the individual responsible for maintenance of such
18 records in compliance with the Act.

19 **H. Application for Escrow Agent License.** It is AGREED that the entry of this Consent
20 Order will not preclude Respondent TRG from obtaining an escrow agent license, SO LONG AS all
21 requirements under chapter 18.44 RCW and chapter 208-680 WAC are satisfactorily met, including
22 the application being complete as determined by the Department.

1 I. **Authority to Execute Order.** It is AGREED that the undersigned represented and
2 warranted that they have the full power and right to execute this Consent Order on behalf of the
3 parties represented.

4 J. **Non-Compliance with Order.** It is AGREED that Respondent TRG understands that
5 failure to abide by the terms and conditions of this Consent Order may result in further legal action
6 by the Director. In the event of such legal action, Respondent TRG may be responsible to reimburse
7 the Director for the cost incurred in pursuing such action, including but not limited to, attorney fees.

8 K. **Voluntarily Entered.** It is AGREED that Respondent TRG has voluntarily entered into
9 this Consent Order, which is effective when signed by the Director's designee.

10 L. **Completely Read, Understood, and Agreed.** It is AGREED that Respondent TRG has
11 read this Consent Order in its entirety and fully understands and agrees to all of the same.

12 **RESPONDENTS:**

13 TRG Settlement Services, LLP
14 d/b/a Convenient Closing Services

15 By:

16 

17 Don Evans
18 Senior Vice President

11/1/13
Date

19 Name:
20 Title:

Date

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DO NOT WRITE BELOW THIS LINE

THIS ORDER ENTERED THIS 6th DAY OF November, 2013



[Redacted signature]

DEBORAH BORTNER
Director
Division of Consumer Services
Department of Financial Institutions

Presented by:

[Redacted signature]

Gregory H. Sandoz
Financial Legal Examiner

Approved by:

[Redacted signature]

Charles E. Clark
Enforcement Chief

RECEIVED
NOV 27 2013

CONSENT ORDER
C-13-1290-13-CO01
TRG Settlement Services, LLP