

ORDER SUMMARY – Case Number: C-17-2132

Name(s): Brunty Law Firm, Inc. d/b/a Brunty Law Firm
Mark A. Brunty

Order Number: C-17-2132-18-FO02

Effective Date: 10/18/2018

License Number: U/L
Or NMLS Identifier [U/L]

License Effect: N/A

Not Apply Until: 10/18/2023

Not Eligible Until: 10/18/2023

Prohibition/Ban Until: 10/18/2023

Investigation Costs	\$5,366.40	Due 11/17/18	Paid <input type="checkbox"/> Y <input checked="" type="checkbox"/> N	Date
Fine	\$27,000.00	Due 11/17/18	Paid <input type="checkbox"/> Y <input checked="" type="checkbox"/> N	Date
Assessment(s)	\$	Due	Paid <input type="checkbox"/> Y <input type="checkbox"/> N	Date
Refunds	\$19,950.00	Due 11/17/18	Paid <input type="checkbox"/> Y <input checked="" type="checkbox"/> N	Date
Financial Literacy and Education	\$	Due	Paid <input type="checkbox"/> Y <input type="checkbox"/> N	Date
Cost of Prosecution	\$	Due	Paid <input type="checkbox"/> Y <input type="checkbox"/> N	Date
	No. of Victims:	9		

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
7 by:

8 INTEGRITY PARTNERS LLC; TERRY
9 WALDEN, Principal of Integrity Partners LLC;
10 JESSICA WALDEN, Member of Integrity
11 Partners LLC; EMERY LAW LLC d/b/a Emery
Law; MELANIE ANNE EMERY, Member of
Emery Law LLC and Sole Proprietor of Emery
Law; BRUNTY LAW FIRM, INC. d/b/a Brunty
Law Firm; MARK A. BRUNTY, Officer of
Brunty Law Firm, Inc. and Sole Proprietor d/b/a
Brunty Law Firm; and ROBERT G. BACON,
Sole Proprietor d/b/a Bacon Law Firm,
Respondents.

No.: C-17-2132-18-FO02

FINAL ORDER RE:

MARK A. BRUNTY and BRUNTY LAW
FIRM, INC. d/b/a BRUNTY LAW FIRM

12 **I. DIRECTOR'S CONSIDERATION**

13 A. Default. This matter has come before the Director of the Department of Financial
14 Institutions of the State of Washington (Director), through his designee, Consumer Services Division
15 Director Charles E. Clark (Director's designee), pursuant to RCW 34.05.440(1). On July 26, 2018,
16 the Director, through the Director's designee, issued a Statement of Charges and Notice of Intention
17 to Enter an Order to Cease and Desist, Prohibit from Industry, Order Refunds, Impose Fine, Collect
18 Investigation Fee, and Recover Costs and Expenses (Statement of Charges) against Brunty Law Firm,
19 Inc. d/b/a Brunty Law Firm and Mark A. Brunty (Respondents Brunty). A copy of the Statement of
20 Charges is attached and incorporated into this order by this reference. The Statement of Charges was
21 accompanied by a cover letter dated July 27, 2018, a Notice of Opportunity to Defend and
22 Opportunity for Hearing, and a blank Application for Adjudicative Hearing for each of Respondents
23 Brunty (collectively, accompanying documents).

1 On June 12, 2018, the Department received confirmation from the Myrtle Beach Branch
2 Office of the United States Postal Service that mail addressed to Respondent Mark A. Brunty was
3 being delivered to 856 Carolina Farm Boulevard, Myrtle Beach, South Carolina 29579 (Carolina
4 Farm Address). On July 27, 2018, the Department served Respondents Brunty with the Statement of
5 Charges and accompanying documents by First-Class mail at the Carolina Farm Address. The
6 documents sent by First-Class mail were not returned to the Department by the United States Postal
7 Service. On August 24, 2018, the Department again received confirmation from the United States
8 Postal Service that mail addressed to Respondent Mark A. Brunty was being delivered to the Carolina
9 Farm Address.

10 Respondents Brunty did not request an adjudicative hearing within twenty calendar days after
11 the Department served the Notice of Opportunity to Defend and Opportunity for Hearing, as provided
12 for in WAC 208-08-050(2).

13 B. Record Presented. The record presented to the Director's designee for his review and
14 for entry of a final decision included the following: Statement of Charges, cover letter dated July 27,
15 2018, Notice of Opportunity to Defend and Opportunity for Hearing, and blank Application for
16 Adjudicative Hearing for Respondent, with documentation for service.

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

19 II. FINAL ORDER

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

22 A. IT IS HEREBY ORDERED, That:

- 23 1. Respondents Brunty Law Firm, Inc. and Mark A. Brunty cease and desist from
24 engaging in the business of a mortgage broker or loan originator.

2. Respondents Brunty Law Firm, Inc. and Mark A. Brunty are prohibited from participation, in any matter, in the conduct of the affairs of any mortgage broker subject to licensure by the Director for a period of five years.
3. Respondents Brunty Law Firm, Inc. and Mark A. Brunty pay refunds to the consumers identified in Appendix B to the Statement of Charges in the amount set forth therein, which shall be paid jointly and severally with Integrity Partners LLC, Terry Walden, and Jessica Walden if Integrity Partners LLC, Terry Walden, or Jessica Walden are ordered to pay such a fine to the consumers identified in Appendix B, and to each Washington State consumer with whom Respondent Brunty Law Firm, Inc. or Respondent Mark A. Brunty entered into a contract for residential mortgage loan modification services related to real property in Washington State equal to the amount collected from those consumers for those services.
4. Respondents Brunty Law Firm, Inc. and Mark A. Brunty pay a fine of \$27,000.00, which shall be paid jointly and severally with Integrity Partners LLC, Terry Walden, and Jessica Walden if Integrity Partners LLC, Terry Walden, or Jessica Walden are ordered to pay such a fine.
5. Respondents Brunty Law Firm, Inc. and Mark A. Brunty pay an investigation fee of \$5,366.40, jointly and severally with any other Respondent or Respondents against whom an order to pay an investigation fee is entered.
6. Respondents Brunty Law Firm, Inc. and Mark A. Brunty, their employees, and agents maintain records in compliance with chapter 19.146 RCW, the Mortgage Broker Practices Act (Act) and provide the Director with the location of the books, records and other information relating to their business, and the name, address and telephone number of the individual responsible for maintenance of such records in compliance with the Act.

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

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

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

7 D. Judicial Review. Respondents Brunty have the right to petition the superior court for
8 judicial review of this agency action under the provisions of chapter 34.05 RCW. For the
9 requirements for filing a Petition for Judicial Review, see RCW 34.05.510 and sections following.

10 E. Non-compliance with Order. If Respondents Brunty do not comply with the terms of
11 this order, **including payment of any amounts owed within 30 days of receipt of this order**, the
12 Department may seek its enforcement by the Office of the Attorney General to include the collection
13 of the refunds, fines, and investigation fees imposed herein. The Department also may assign the
14 amounts owed to a collection agency for collection.

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

18 DATED this 18TH day of October, 2018.

19
20 STATE OF WASHINGTON
DEPARTMENT OF FINANCIAL INSTITUTIONS

21
22 /s/ _____
CHARLES E. CLARK
23 Director
Division of Consumer Services

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**STATE OF WASHINGTON
DEPARTMENT OF FINANCIAL INSTITUTIONS
DIVISION OF CONSUMER SERVICES**

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

INTEGRITY PARTNERS LLC; TERRY
WALDEN, Principal of Integrity Partners LLC;
JESSICA WALDEN, Member of Integrity Partners
LLC; EMERY LAW LLC d/b/a Emery Law;
MELANIE ANNE EMERY, Member of Emery
Law LLC and Sole Proprietor of Emery Law;
BRUNTY LAW FIRM, INC. d/b/a Brunty Law
Firm; MARK A. BRUNTY, Officer of Brunty Law
Firm, Inc. and Sole Proprietor d/b/a Brunty Law
Firm; and ROBERT G. BACON, Sole Proprietor
d/b/a Bacon Law Firm,

Respondents.

No. C-17-2132-18-SC01

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

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). 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 her designee, Division of Consumer Services
Director Charles E. Clark, institutes this proceeding and finds as follows:

I. FACTUAL ALLEGATIONS

1.1 Respondents.

A. Respondent Integrity Partners LLC (Respondent Integrity) has never been
licensed by the Department of Financial Institutions of the State of Washington (Department) to
conduct business as a mortgage broker.

1 **B. Respondent Terry Walden** was a principal officer of Respondent Integrity.

2 Respondent Terry Walden has never been licensed by the Department to conduct business as a
3 mortgage broker or loan originator.

4 **C. Respondent Jessica Walden** was a member of Respondent Integrity. Respondent

5 Jessica Walden has never been licensed by the Department to conduct business as a mortgage
6 broker or loan originator.

7 **D. Respondent Emery Law LLC (Respondent Emery Law)** has never been licensed

8 by the Department to conduct business as a mortgage broker.

9 **E. Respondent Melanie Anne Emery (Respondent Emery)** is a member of

10 Respondent Emery Law. Alternatively, Respondent Emery is a sole proprietor doing business
11 as Emery Law. Respondent Emery has never been licensed by the Department to conduct
12 business as a mortgage broker or loan originator.

13 **F. Respondent Brunty Law Firm, Inc. d/b/a Brunty Law Firm (Respondent**

14 **Brunty Law)** has never been licensed by the Department to conduct business as a mortgage
15 broker.

16 **G. Respondent Mark A. Brunty (Respondent Brunty)** was an officer of Respondent

17 Brunty Law. Alternatively, Respondent Brunty was a sole proprietor doing business as Brunty
18 Law Firm. Respondent Brunty has never been licensed by the Department to conduct business
19 as a mortgage broker or loan originator.

20 **H. Respondent Robert G. Bacon (Respondent Bacon)** is a sole proprietor doing

21 business as Bacon Law Firm. Respondent Bacon has never been licensed by the Department to
22 conduct business as a mortgage broker or loan originator.

1 **1.2 Unlicensed Activity.**

2 **A. Respondents Integrity, Terry Walden, and Jessica Walden.** Between
3 approximately May 4, 2012, and September 9, 2016, Respondents Integrity, Terry Walden, and
4 Jessica Walden provided or offered to provide residential mortgage loan modification services to
5 Washington State consumers while Respondents Integrity, Terry Walden, and Jessica Walden
6 were not licensed by the Department to provide those services and while holding themselves out
7 as conducting business as Respondents Emery Law, Brunty Law, and Bacon. Lists of
8 Washington State consumers with whom Respondents Integrity, Terry Walden, and Jessica
9 Walden conducted business as a mortgage broker or loan originator, and the amount paid by each
10 consumer, is appended hereto in Appendices A through C and incorporated herein by reference.
11 Between at least August 8, 2012, and June 10, 2013, Respondents Integrity, Terry Walden, and
12 Jessica Walden also held out Respondent Integrity as able to offer residential mortgage loan
13 modification services to Washington consumers by advertising on Respondent Integrity's page at
14 www.facebook.com that Respondent Integrity provided such services.

15 **B. Respondents Emery Law and Emery.** Between approximately November 1,
16 2013, and September 9, 2016, Respondents Emery Law and Emery provided or offered to
17 provide residential mortgage loan modification services to Washington State consumers while
18 Respondents Emery Law and Emery were not licensed by the Department to provide those
19 services. A list of Washington State consumers with whom Respondents Emery Law and
20 Emery conducted business as a mortgage broker or loan originator, and the amount paid by each
21 consumer, is appended hereto as Appendix A and incorporated herein by reference.

22 **C. Respondents Brunty Law and Brunty.** Between approximately May 4, 2012, and
23 January 14, 2013, Respondents Brunty Law and Brunty provided or offered to provide
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1 residential mortgage loan modification services to Washington State consumers while
2 Respondents Brunty Law and Brunty were not licensed by the Department to provide those
3 services. A list of Washington State consumers with whom Respondents Brunty Law and
4 Brunty conducted business as a mortgage broker or loan originator, and the amount paid by
5 each consumer, is appended hereto as Appendix B and incorporated herein by reference.

6 **D. Respondent Bacon.** Between approximately December 10, 2012, and July 2, 2015,
7 Respondent Bacon provided or offered to provide residential mortgage loan modification
8 services to Washington State consumers while Respondent Bacon was not licensed by the
9 Department to provide those services. A list of Washington State consumers with whom
10 Respondent Bacon conducted business as a mortgage broker or loan originator, and the amount
11 paid by each consumer, is appended hereto as Appendix C and incorporated herein by reference.

12 **1.3 Misrepresentations and Omissions.** Respondents represented that they were lawfully
13 able to provide the residential mortgage loan modification services or omitted disclosing that
14 they were not lawfully able to provide those services.

15 **1.4 On-Going Investigation.** The Department's investigation into the alleged violations of
16 the Act by Respondents continues to date.

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

18 **2.1 Mortgage Broker Defined.** Pursuant to RCW 19.146.010(14), "Mortgage broker"
19 means any person who for direct or indirect compensation or gain, or in the expectation of direct
20 or indirect compensation or gain (a) assists a person in obtaining or applying to obtain a
21 residential mortgage loan or performs residential mortgage loan modification services or (b)
22 holds himself or herself out as being able to assist a person in obtaining or applying to obtain a
23 residential mortgage loan or provide residential mortgage loan modification services.

1 **2.2 Loan Originator Defined.** Pursuant to RCW 19.146.010(11)(b), "Loan originator"
2 means a natural person who for direct or indirect compensation or gain or in the expectation of
3 direct or indirect compensation or gain performs residential mortgage loan modification
4 services or holds himself or herself out as being able to perform residential mortgage loan
5 modification services.

6 **2.3 Prohibited Acts.** Based on the Factual Allegations set forth in Section I above,
7 Respondents are in apparent violation of RCW 19.146.0201(2) and (3) for engaging in an unfair
8 or deceptive practice toward any person and obtaining property by fraud or misrepresentation.

9 **2.4 Requirement to Obtain and Maintain Mortgage Broker License.** Based on the
10 Factual Allegations set forth in Section I above, Respondents are in apparent violation of RCW
11 19.146.200(1) for engaging in the business of a mortgage broker for Washington residents or
12 property without first obtaining a license to do so.

13 **2.5 Requirement to Obtain and Maintain Loan Originator License.** Based on the Factual
14 Allegations set forth in Section I above, Respondents are in apparent violation of RCW
15 19.146.200(1) for engaging in the business of a loan originator without first obtaining and
16 maintaining a license.

17 **2.6 Prohibition against Taking Advance Fees.** Based on the Factual Allegations set forth
18 in Section I above, Respondents are in apparent violation of RCW 19.146.0201(11) and 12 C.F.R.
19 § 1015.5 for taking advance fees for loan modification services.

20 III. AUTHORITY TO IMPOSE SANCTIONS

21 **3.1 Authority to Issue an Order to Cease and Desist.** Pursuant to RCW 19.146.220(3),
22 the Director may issue orders directing any person subject to the Act to cease and desist from
23 conducting business.

1 **3.2 Authority to Prohibit from Industry.** Pursuant to RCW 19.146.220(4), the Director
2 may issue orders prohibiting from participation in the conduct of the affairs of a licensed
3 mortgage broker any person subject to licensing under the Act for any violation of the Act.

4 **3.3 Authority to Order Refunds.** Pursuant to RCW 19.146.220(2), the Director may order
5 refunds against any person subject to the Act for any violation of the Act.

6 **3.4 Authority to Impose Fine.** Pursuant to RCW 19.146.220(2), the Director may impose
7 fines against any person subject to the Act for any violation of the Act.

8 **3.5 Authority to Collect Investigation Fee.** Pursuant to RCW 19.146.228(2) and WAC
9 208-660-550(4)(a), the Department will charge \$48 per hour for an examiner's time devoted to
10 an investigation of any person subject to the Act.

11 **3.6 Authority to Recover Costs and Expenses.** Pursuant to RCW 19.146.221(2), the
12 Director may recover the state's costs and expenses for prosecuting violations of the Act.

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

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

17 **4.1** Respondents Integrity Partners LLC; Terry Walden; Jessica Walden; Emery Law
18 LLC; Melanie Anne Emery; Brunty Law Firm, Inc.; Mark A. Brunty; and Robert
19 G. Bacon cease and desist engaging in the business of a mortgage broker or loan
originator.

20 **4.2** Respondents Integrity Partners LLC; Terry Walden; Jessica Walden; Emery Law
21 LLC; Melanie Anne Emery; Brunty Law Firm, Inc.; Mark A. Brunty; and Robert
22 G. Bacon 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.

23 **4.3** Respondents Integrity Partners LLC; Terry Walden; Jessica Walden; Emery
24 Law; and Melanie Anne Emery jointly and severally pay refunds to the
consumers identified Appendix A in the amount set forth therein, and that

1 Respondents jointly and severally pay refunds to each consumer with whom
2 Respondents Emery Law or Melanie Anne Emery entered into a contract for
3 residential mortgage loan modification services related to real property or
4 consumers located in the Washington State equal to the amount collected from
5 each consumer for those services in an amount to be determined at hearing.

4 **4.4** Respondents Integrity Partners LLC; Terry Walden; Jessica Walden; Brunty Law
5 Firm, Inc.; and Mark A. Brunty jointly and severally pay refunds to the
6 consumers identified Appendix B in the amount set forth therein, and that
7 Respondents jointly and severally pay refunds to each consumer with whom
8 Respondents Brunty Law Firm, Inc. or Mark A. Brunty entered into a contract
9 for residential mortgage loan modification services related to real property or
10 consumers located in the Washington State equal to the amount collected from
11 each consumer for those services in an amount to be determined at hearing.

8 **4.5** Respondents Integrity Partners LLC; Terry Walden; Jessica Walden; and Robert
9 G. Bacon jointly and severally pay refunds to the consumers identified Appendix
10 C in the amount set forth therein, and that Respondents jointly and severally pay
11 refunds to each consumer with whom Respondent Robert G. Bacon entered into
12 a contract for residential mortgage loan modification services related to real
13 property or consumers located in the Washington State equal to the amount
14 collected from each consumer for those services in an amount to be determined
15 at hearing.

13 **4.6** Respondents Integrity Partners LLC; Terry Walden; Jessica Walden; Emery
14 Law; and Melanie Anne Emery jointly and severally pay a fine, which as of the
15 date of this Statement of Charges totals \$87,000.00.

15 **4.7** Respondents Integrity Partners LLC; Terry Walden; Jessica Walden; Brunty Law
16 Firm, Inc.; and Mark A. Brunty jointly and severally pay a fine, which as of the
17 date of this Statement of Charges totals \$27,000.00.

17 **4.8** Respondents Integrity Partners LLC; Terry Walden; Jessica Walden; and Robert
18 G. Bacon a fine, which as of the date of this Statement of Charges totals
19 \$51,000.00.

19 **4.9** Respondents Integrity Partners LLC; Terry Walden; Jessica Walden; Emery Law
20 LLC; Melanie Anne Emery; Brunty Law Firm, Inc.; Mark A. Brunty; and Robert
21 G. Bacon jointly and severally pay an investigation fee, which as of the date of
22 this Statement of Charges totals \$5,366.40.

21 **4.10** Respondents Integrity Partners LLC; Terry Walden; Jessica Walden; Emery Law
22 LLC; Melanie Anne Emery; Brunty Law Firm, Inc.; Mark A. Brunty; and Robert
23 G. Bacon maintain records in compliance with the Act and provide the
24 Department with the location of the books, records and other information relating
to Respondents' provision of residential mortgage loan modification services in

1 Washington, and the name, address and telephone number of the individual
2 responsible for maintenance of such records in compliance with the Act.

3 **4.11** Respondents Integrity Partners LLC; Terry Walden; Jessica Walden; Emery Law
4 LLC; Melanie Anne Emery; Brunty Law Firm, Inc.; Mark A. Brunty; and Robert
5 G. Bacon pay the Department's costs and expenses for prosecuting violations of
6 the Act in an amount to be determined at hearing or by Declaration with
7 supporting documentation in event of default by any Respondents.

8 **V. AUTHORITY AND PROCEDURE**

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

14 Dated this 26th day of July, 2018.

15 /s/
16 CHARLES E. CLARK
17 Director, Division of Consumer Services
18 Department of Financial Institutions

19 Presented by:

20 /s/
21 AMANDA J. HERNDON
22 Financial Legal Examiner

23 Approved by:

24 /s/
STEVEN C. SHERMAN
Enforcement Chief

Appendix A

<u>Consumer</u>	<u>Amount Paid</u>
D.A.	\$3,500
C.A	\$3,020
J.B.	\$2,995
C.B. and R.B.	\$2,995
P.B.	\$2,995
D.B.	\$3,995
L.C.	\$1,500
M.C.	\$2,995
M.E.	\$2,995
M.G.	\$2,995
E.H.	\$3,000 ¹
S.H.	\$3,000
D.H.	\$2,995
R.J.	\$2,995
A.K.	\$2,995
K.K and S.K.	\$2,995
J.L.	\$2,995
M.L.	\$2,996
S.L and T.L.	\$2,995
D.M.	\$2,995
E.O.	\$2,995
A.P. and J.P.	\$1,750
L.R.	\$3,000
J.S.	\$3,000
J.S.	\$3,495
P.S.	\$2,995
L.S.	\$2,995
P.T.	\$2,915
D.W.	\$3,495

¹ Consumer E.H. received a \$200 refund.

Appendix B

<u>Consumer</u>	<u>Amount Paid</u>
R.A.	\$1,455
L.D and C.D.	\$2,900
S.K. and A.K.	\$3,400
D.R.	\$1,000
M.R.	\$1,450
P.T.	\$1,450
P.T. and D.T.	\$2,495
A.U.	\$2,900
L.Y.	\$2,900

¹ Consumer P.T. received a \$2,495 refund from Respondent Bacon on or about June 27, 2018.

Appendix C

<u>Consumer</u>	<u>Amount Paid</u>
R.A.	\$1,455
J.B. and R.B.	\$2,900
H.G. and C.R.	\$2,495
S.H. and S.H.	\$2,900
K.H.	\$1,450
S.K and A.K.	\$3,400
M.M. and R.G.M.	\$2,900
J.P and H.P.	\$2,900
B.P.	\$2,900
E.R.	\$2,900
J.R.	\$3,400
R.R. and L.R.	\$2,900
L.S and G.S.	\$2,900
P.T.	\$1,450
P.T. and D.T.	\$2,495
A.U.	\$2,900
R.W. and H.D.	\$2,900

¹ Consumer P.T. received a \$2,495 refund from Respondent Bacon on or about June 27, 2018.