

ORDER SUMMARY – Case Number: C-17-2145

Name(s): Kristine Marie Moreland

Order Number: C-17-2145-21-CO05

Effective Date: 6/10/2021

License Number: 173304

License Effect: N/A

Not Apply Until: N/A

Not Eligible Until: N/A

Prohibition/Ban Until: N/A

Investigation Costs	\$15,000	Due \$11,500	Paid <input type="checkbox"/> Y <input checked="" type="checkbox"/> N	Date 9/30/21
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
Financial Literacy and Education	\$14,000	Due \$12,500	Paid <input type="checkbox"/> Y <input checked="" type="checkbox"/> N	Date 9/30/21
Cost of Prosecution	\$	Due	Paid <input type="checkbox"/> Y <input type="checkbox"/> N	Date
	No. of Victims:			

Comments: Respondent agrees to cooperate with the Department's ongoing investigation. Respondent agrees to pay \$5,000 upon entry of the consent order and the remaining \$24,000 no later than September 30, 2021.

1 Based upon the foregoing:

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

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

9 **C. No Admission of Liability.** It is AGREED that the parties intend this Consent Order
10 to fully resolve the Statement of Charges and that Respondent does not admit to any wrongdoing by
11 its entry.

12 **D. Financial Literacy Payment.** Pursuant to RCW 31.04.093(7), the Department may
13 accept as part of this Consent Order payment for purposes of financial literacy and education
14 programs authorized under RCW 43.320.150. It is AGREED that Respondent, who is supportive of
15 this program and interested in resolving this matter, shall make this payment to the Department in the
16 amount of \$14,000. Respondent further agrees to pay \$2,500 upon entry of this Consent Order to the
17 Department. It is further AGREED that Respondent may not advertise this payment.

18 **E. Investigation Fee.** It is AGREED that Respondent, in the interest of resolving the
19 matter, shall pay to the Department an investigation fee of \$15,000. Respondent further agrees to pay
20 \$2,500 upon entry of this Consent Order. The partial Financial Literacy Payment and the
21 Investigation Fee shall be paid together in one \$5,000 cashier's check made payable to the
22 "Washington State Treasurer." Further, Respondent agrees to pay the remaining \$24,000 balance via
23

1 a cashier's check made payable to the "Washington State Treasurer" to be submitted by Respondent
2 to the Department no later than September 30, 2021.

3 **F. Complete Cooperation with the Department.** It is AGREED that, upon written
4 request by the Department, Respondent shall provide the Department truthful and complete sworn
5 statements outlining her activities with respect to Mortgage Loan Originator Lysa M. Catlin, NMLS
6 #754386 (Catlin) and Caliber Home Loans, Inc., NMLS #15622 (Caliber) and any and all persons
7 involved with Caliber. The sworn statements may take the form of affidavits, declarations, or
8 deposition testimony, at the Department's discretion. In addition to providing sworn statements, it is
9 AGREED that, upon written request by the Department, Respondent shall cooperate fully, truthfully,
10 and completely with the Department and provide any and all information known to them relating in
11 any manner to Catlin or Caliber and any and all persons involved or in any way associated with
12 Catlin or Caliber. It is further AGREED that, upon written request by the Department, Respondent
13 shall provide any and all documents, writings or materials, or objects or things of any kind in her
14 possession or under her care, custody, or control that she is authorized to possess, obtain, or distribute
15 relating directly or indirectly to all areas of inquiry and investigation. It is further AGREED that
16 Respondent shall testify fully, truthfully, and completely at any and all proceedings related to any
17 Department investigation or enforcement action related to any and all persons involved or in any way
18 associated with Catlin or Caliber, and any respondents named therein. Respondent understands and
19 agrees that her failure to cooperate fully, truthfully, and completely would constitute a breach of this
20 Consent Order and a violation of the Act, which may result in sanctions, including but not limited to
21 revocation of Respondent's mortgage loan originator license.

22 **G. Non-Compliance with Order.** It is AGREED that Respondent understands that
23 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 may be responsible to reimburse the
2 Director for the cost incurred in pursuing such action, including but not limited to, attorney fees.

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

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

7 **J. Counterparts.** This Consent Order may be executed by Respondent in any number of
8 counterparts, including by facsimile or e-mail of a .pdf or similar file, each of which shall be deemed
9 to be an original, but all of which, taken together, shall constitute one and the same Consent Order.

10
11 **RESPONDENT:**

12
13 /s/ _____
14 Kristine M. Moreland
Mortgage Loan Originator

5/27/2021 _____
Date

15
16 **APPROVED FOR ENTRY:**
By:

17
18 /s/ _____
19 Kristine Kruger, WSBA #44612
T. Markus Funk, *pro hac vice*
Perkins Coie LLP
Attorneys for Respondent

6/7/2021 _____
Date

1 **1.2 Prohibited Practices.** While employed at Caliber, Respondent facilitated the making of
2 unlicensed residential mortgage loans to at least four borrowers in the state of Washington.
3 Respondent’s conduct included marketing unlicensed loans, submitting borrowers’ loan application
4 information to an unlicensed lender, providing borrowers and an unlicensed lender with refinance
5 loan preapprovals from Caliber, and negotiating loan terms between borrowers and an unlicensed
6 lender. The loans offered by the unlicensed lender were short-term, high-cost loans. Respondent
7 facilitated the making of unlicensed loans with the knowledge that the borrowers were seeking loans
8 for primary residences, and the expectation that the borrowers would refinance the unlicensed loans
9 with Caliber and Respondent would receive a commission. Respondent did not disclose to borrowers
10 that they were dealing with an unlicensed lender.

11 **1.3 Nationwide Multistate Licensing System (NMLS) Disclosures and Attestations.**

12 **A. Pending Regulatory Action.** On or about March 11, 2020, the Department issued a
13 Statement of Charges against Respondent. The Statement of Charges was served on Respondent on
14 or about March 13, 2020, and e-mailed to Respondent on or about April 9, 2020. The Statement of
15 Charges included the facts alleged in paragraph 1.2 above and the violations alleged in paragraphs 2.1
16 and 2.2 below.

17 **B. Failure to Update Disclosure Questions.** Upon license application, an MLO must
18 submit answers to disclosure questions to the Department through NMLS. If an MLO’s answer to
19 any disclosure question changes, the MLO must update his or her answers in NMLS within 10 days
20 of the change. Disclosure Question (N) states, “Is there a pending regulatory action proceeding
21 against you for any alleged violation described in (K) . . .?” Disclosure Question (K) includes the
22 following questions:

23 Has any State or federal regulatory agency or foreign financial regulatory authority or
24 self-regulatory organization (SRO) ever:

1 (1) found you to have made a false statement or omission or been dishonest,
2 unfair or unethical?

3 (2) found you to have been involved in a violation of a financial services-related
4 business regulation(s) or statute(s)?

5 The Statement of Charges was a pending regulatory action alleging the violations described in
6 Disclosure Questions (K)(1) and (K)(2). As of the date of this Amended Statement of Charges,
7 Respondent has not updated her answers to Disclosure Question (N) from “No” to “Yes.”

8 **C. License Renewal Attestation.** Every MLO licensed with the Department must apply
9 to renew their license annually in order to maintain the license. During the renewal process, the
10 MLO must submit an attestation in support of the renewal application through NMLS. On or about
11 December 28, 2020, Respondent filed an attestation in connection with her annual license renewal.

12 In that attestation, Respondent swore,

13 to the best of my knowledge and belief the information contained in my online
14 record, including jurisdiction specific requirements where I am licensed or registered,
15 is true, accurate and complete in accordance with the appropriate jurisdiction's law.
16 Additionally, I acknowledge that I have a duty and agree to expediently update and
17 correct the information as it changes.

18 When Respondent submitted this attestation, her record did not include an accurate and true response
19 to Disclosure Question (N).

20 **1.4 On-Going Investigation.** The Department’s investigation into the alleged violations of the
21 Act by Respondent continues to date.

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

23 **2.1 Unfair or Deceptive Practice.** Based on the Factual Allegations set forth in Section I above,
24 Respondent is in apparent violation of RCW 31.04.027(1)(b)¹ for directly or indirectly engaging in
any unfair or deceptive practice toward any person.

¹ This section of the Consumer Loan Act was revised as of June 7, 2018. Prior to that date, the section was listed as
RCW 31.04.027(2).

1 **2.2 Aiding and Abetting Violations of the Act.** Based on the Factual Allegations set forth in
2 Section I above, Respondent is in apparent violation of RCW 31.04.175(1) for knowingly aiding and
3 abetting a lender to make residential mortgage loans when the lender was not licensed to make such
4 loans as required by RCW 31.04.035(1).

5 **2.3 Failing to Timely Report Significant Events.** Based on the Factual Allegations set forth in
6 Section I above, Respondent is in apparent violation of RCW 31.04.027(1)(b) and WAC 208-620-710
7 (27)(a) for failing to amend her NMLS record and upload supporting documents within ten days after
8 an occurrence of a change in response to a disclosure questions within NMLS.

9 **2.4 False Statements and Omissions of Fact to the Department.** Based on the Factual
10 Allegations set forth in Section I above, Respondent is in apparent violation of RCW 31.04.027(1)(h)
11 for negligently making any false statement or knowingly and willfully making any omission of
12 material fact in connection with any reports filed with the Department by a licensee.

13 III. AUTHORITY TO IMPOSE SANCTIONS

14 **3.1 Authority to Revoke License.** Pursuant to RCW 31.04.093(3)(b), the Director may revoke a
15 license if a licensee, either knowingly or without the exercise of due care, has violated any provision
16 of the Act or any rule adopted under the Act.

17 **3.2 Authority to Prohibit from the Industry.** Pursuant to RCW 31.04.093(6)(e), the Director
18 may issue an order prohibiting from participation in the affairs of any licensee, any officer, principal,
19 employee, MLO, or any other person subject to the Act for a violation of RCW 31.04.027.

20 **3.3 Authority to Impose Fine.** Pursuant to RCW 31.04.093(4), the Director may impose fines of
21 up to one hundred dollars per day, per violation, upon the licensee, its employee or loan originator, or
22 any other person subject to the Act for any violation of the Act or failure to comply with any order or
23 subpoena issued by the Director under the Act.

1 **3.4 Authority to Charge Investigation Fee.** Pursuant to RCW 31.04.145(3) and WAC 208-620-
2 590, WAC 208-620-610(7), every licensee investigated by the Director or the Director's designee
3 shall pay for the cost of the investigation, calculated at the rate of \$69.01 per staff hour devoted to the
4 investigation

5 **3.5 Authority to Recover Costs and Expenses.** Pursuant to RCW 31.04.205(2), the Director
6 may recover the state's costs and expenses for prosecuting violations of the Act.

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

8 Respondent's violations of the provisions of chapter 31.04 RCW and chapter 208-620 WAC,
9 as set forth in the above Factual Allegations, Grounds for Entry of Order, and Authority to Impose
10 Sanctions, constitute a basis for the entry of an Order under RCW 31.04.093, RCW 31.04.165, RCW
11 34.04.202, and RCW 31.04.205. Therefore, it is the Director's intent to ORDER that:

- 12 **4.1** Respondent Kristine M. Moreland's license to conduct the business of a mortgage loan
13 originator be revoked.
- 14 **4.2** Respondent Kristine M. Moreland be prohibited from participation in the conduct of
15 the affairs of any consumer loan company subject to licensure by the Director, in any
16 manner, for a period of five years.
- 17 **4.3** Respondent Kristine M. Moreland pay a fine. As of the date of this Amended
18 Statement of Charges, the fine totals \$18,000.
- 19 **4.4** Respondent Kristine M. Moreland pay an investigation fee. As of the date of this
20 Amended Statement of Charges, the investigation fee totals \$8,000.
- 21 **4.5** Respondent Kristine M. Moreland pay the Department's costs and expenses for
22 prosecuting violations of the Act in an amount to be determined at hearing or by
23 declaration with supporting documentation in event of default by Respondent.

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1 **V. AUTHORITY AND PROCEDURE**

2 This Amended Statement of Charges is entered pursuant to the provisions of RCW 31.04.093,
3 RCW 31.04.165, RCW 31.04.202, and RCW 31.04.205, and is subject to the provisions of chapter
4 34.05 RCW (The Administrative Procedure Act). Respondent may make a written request for a
5 hearing as set forth in the NOTICE OF OPPORTUNITY FOR ADJUDICATIVE HEARING AND
6 TO DEFEND accompanying this Amended Statement of Charges.

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8 Dated this 28th day of January, 2021.

9 /s/
10 Lucinda Fazio, Director
11 Division of Consumer Services
12 Department of Financial Institutions

13 Presented by:

14 /s/
15 AMANDA J. HERNDON
16 Financial Legal Examiner

17 Approved by:

18 /s/
19 STEVEN C. SHERMAN
20 Enforcement Chief
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7 employee, mortgage loan originator, or any other person subject to the Act for a violation of RCW
8 31.04.027.

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10 up to one hundred dollars per day, per violation, upon the licensee, its employee or loan originator, or
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1 **V. AUTHORITY AND PROCEDURE**

2 This Statement of Charges is entered pursuant to the provisions of RCW 31.04.093, RCW
3 31.04.165, RCW 31.04.202, and RCW 31.04.205, and is subject to the provisions of chapter 34.05
4 RCW (The Administrative Procedure Act). Respondent may make a written request for a hearing as
5 set forth in the NOTICE OF OPPORTUNITY FOR ADJUDICATIVE HEARING AND TO
6 DEFEND accompanying this Statement of Charges.

7
8 Dated this 11th day of March, 2020.

9 /s/
10 Lucinda Fazio, Director
11 Division of Consumer Services
12 Department of Financial Institutions

13 Presented by:

14 /s/
15 KENNETH J. SUGIMOTO
16 Financial Legal Examiner Supervisor

17 Approved by:

18 /s/
19 STEVEN C. SHERMAN
20 Enforcement Chief
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