

**ORDER SUMMARY – Case Number: C-17-2289**

**Name(s):** Sandra X. Hanley and Jonathan P. Hanley  
 \_\_\_\_\_  
 \_\_\_\_\_

**Order Number:** C-17-2289-20-FO06  
 \_\_\_\_\_

**Effective Date:** 03/03/2020  
 \_\_\_\_\_

**License Number:** U/L NMLS ID: S. Hanley 1967422, J. Hanley 1661933  
**Or NMLS Identifier [U/L]**

**License Effect:** N/A  
 \_\_\_\_\_  
 \_\_\_\_\_

**Not Apply Until:** N/A  
 \_\_\_\_\_

**Not Eligible Until:** N/A  
 \_\_\_\_\_

**Prohibition/Ban Until:** 03/03/2025  
 \_\_\_\_\_

<b>Investigation Costs</b>	\$ 3,086.40	Due: 30 days	Paid <input type="checkbox"/> Y <input checked="" type="checkbox"/> N	Date
<b>Fine</b>	\$ 300,000	Due: 30 days	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/Refunds</b>	\$200,000/TBD	Due: 30 days	Paid <input type="checkbox"/> Y <input checked="" type="checkbox"/> N	Date
<b>Financial Literacy and Education</b>	\$	Due	Paid <input type="checkbox"/> Y <input type="checkbox"/> N	Date
<b>Cost of Prosecution</b>	\$	Due	Paid <input type="checkbox"/> Y <input checked="" type="checkbox"/> N	Date
	No. of Victims:			

**Comments:**  
 \_\_\_\_\_  
 \_\_\_\_\_  
 \_\_\_\_\_  
 \_\_\_\_\_  
 \_\_\_\_\_



STATE OF WASHINGTON  
DEPARTMENT OF FINANCIAL INSTITUTIONS

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

No.: C-17-2289-20-FO06

PREFERRED LAW PLLC a/k/a  
CONSUMER DEFENSE LLC a/k/a  
CONSUMER LINK, INC. a/k/a  
AMERICAN LOAN COUNSELORS a/k/a  
MODIFICATION REVIEW BOARD,  
JONATHAN P. HANLEY, Manager,  
SANDRA X. HANLEY, Manager, and  
BENJAMIN R. HORTON, Manager,

FINAL ORDER RE:

JONATHAN P. HANLEY  
and  
SANDRA X. HANLEY

Respondents.

I. DIRECTOR'S CONSIDERATION

Procedural History. This matter has come before the Deputy Director of the Department of Financial Institutions of the State of Washington acting in her delegated capacity ("Deputy Director"), pursuant to RCW 34.05.440(2). On July 13, 2018, former Director Gloria Papiez, through her designee, former Consumer Services Division Director Charles E. Clark<sup>1</sup>, issued a Statement of Charges and Notice of Intent to Enter an Order to Cease and Desist Business, Prohibit from Industry, Impose Fine, Collect Investigation Fee, and Recover Costs and Expenses ("Statement of Charges") against Jonathan P. Hanley ("Respondent J. Hanley") and Sandra X. Hanley ("Respondent S. Hanley") (jointly "Respondents Hanley").<sup>2</sup> On July 30, 2018, the Department of Financial Institution ("Department") served Respondent S. Hanley with the Statement of Charges and accompanying

<sup>1</sup> Mr. Clark has since been appointed as Director of the Department of Financial Institutions and has delegated Deputy Director Catherine Mele to issue this Final Order.

<sup>2</sup> All other co-Respondents have been served and default Final Orders entered.

1 documents by First Class mail and Federal Express overnight delivery. The Statement of Charges  
2 was accompanied by a cover letter dated July 30, 2018, a Notice of Opportunity to Defend and  
3 Opportunity for Hearing, and a blank Application for Adjudicative Hearing for Respondent S.  
4 Hanley. The Department was subsequently notified that the Application for Administrative Hearing  
5 for Respondent S. Hanley contained a scrivener’s error and a corrected Application for  
6 Administrative hearing was provided on June 21, 2019. On May 2, 2019, the Department served  
7 Respondent J. Hanley with the Statement of Charges and accompanying documents by electronic  
8 transmission (email).<sup>3</sup> The Statement of Charges was accompanied by a cover letter dated May 2,  
9 2019, a Notice of Opportunity to Defend and Opportunity for Hearing, and a blank Application for  
10 Adjudicative Hearing for Respondent J. Hanley. On July 1, 2019, Respondents J. Hanley and S.  
11 Hanley each filed an Application for Adjudicative Hearing, and on July 24, 2019 Respondents J.  
12 Hanley and S. Hanley submitted a waiver of speedy hearing to January 1, 2020.<sup>4</sup>

13 On December 16, 2019, the Department made a request to the Office of Administrative  
14 Hearings (“OAH”) to assign an Administrative Law Judge (“ALJ”) to schedule and conduct a hearing  
15 on the Statement of Charges.<sup>5</sup> On December 26, 2019, OAH issued a Notice of Prehearing  
16 Conference assigning ALJ Terry A. Schuh (“ALJ Schuh”) to preside over prehearing and hearing  
17 proceedings and issue an Initial Decision, and scheduling a telephonic prehearing conference on  
18 Thursday, January 9, 2020, at 10:00 a.m. That Notice stated: “You must call in to the Prehearing  
19 Conference. If you fail to call in, the Administrative Law Judge may hold you in default and dismiss  
20 your appeal. RCW 34.05.440(2)”.

21  
22 <sup>3</sup> Respondent J. Hanley agreed to service by electronic transmission pursuant to RCW 34.05.010(19) and  
WAC 208-08-025. Previous attempts to serve Respondent J. Hanley had been unsuccessful.

23 <sup>4</sup> The waiver was entered to accommodate ongoing litigation between Respondents Hanley and the Federal Trade  
Commission (FTC).

24 <sup>5</sup> On December 9, 2019, the litigation between Respondents Hanley and the FTC was resolved by Summary Judgment in  
favor of the FTC.

1 On January 9, 2020, the prehearing conference was convened by ALJ Schuh at 10:00 a.m.  
2 Respondents Hanley failed to appear and the Department moved for an order of default dismissing  
3 the administrative appeal. On January 10, 2020, ALJ Schuh issued an Order Dismissing Appeals -  
4 Default (“Order of Default”) dismissing the administrative appeals of Respondents Hanley. On  
5 January 10, 2020, ALJ Schuh sent the Order of Default to Respondents Hanley via First-Class mail.

6 Pursuant to RCW 34.05.440(3), Respondents Hanley had seven (7) days from the date of  
7 service of the Order of Default to file a written motion with OAH requesting that the Order of Default  
8 be vacated, and stating the grounds relied upon. Respondents Hanley did not make a request to  
9 vacate during the statutory period.

10 Pursuant to RCW 34.05.464 and WAC 10-08-211, Respondents Hanley had twenty (20) days  
11 from the date of service of the Order of Default to file a Petition for Review of the Order of Default.  
12 Respondents Hanley did not file a Petition for Review during the statutory period.

13 A. Record Presented. The record presented to the Deputy Director for her review and for  
14 entry of a final decision included the following:

- 15 1. Statement of Charges, cover letters dated July 30, 2018, and May 2, 2019, and  
16 Notice of Opportunity to Defend and Opportunity for Hearing, with documentation  
of service.
- 17 2. Applications for Adjudicative Hearing for Sandra X. Hanley and Jonathan P.  
18 Hanley.
- 19 3. Request to OAH for Assignment of Administrative Law Judge.
- 20 4. Notice of Prehearing Conference dated December 26, 2019, with documentation of  
21 service.
- 22 5. Order Dismissing Appeals - Default, dated January 10, 2020, with documentation  
23 of service.
- 24 6. Post Office Verification forms from the Postmaster of Sandy, Utah, for Sandra X.  
Hanley and Jonathan P. Hanley.

1 B. Factual Findings and Grounds for Order. Pursuant to RCW 34.05.440(2), the Deputy  
2 Director hereby adopts the Statement of Charges, which is attached hereto.

3 II. FINAL ORDER

4 Based upon the foregoing, and the Deputy Director having considered the record and being  
5 otherwise fully advised, NOW, THEREFORE:

6 A. IT IS HEREBY ORDERED, That:

- 7 1. Respondents Jonathan P. Hanley and Sandra X. Hanley shall each cease and desist  
8 from engaging in the business of a mortgage broker or loan originator.
- 9 2. Respondents Jonathan P. Hanley and Sandra X. Hanley are each prohibited from  
10 participation, in any manner, in the conduct of the affairs of any mortgage broker  
11 subject to licensure by the Director for a period of five years.
- 12 3. Respondents Jonathan P. Hanley and Sandra X. Hanley shall jointly and severally  
13 refund to the consumers identified by the Department in Appendix A of the Statement  
14 of Charges in the amount of Two Hundred Thousand Dollars (\$200,000.00)  
15 collectively, and jointly and severally refund to each Washington consumer with  
16 whom they entered into a contract for residential mortgage loan modification services  
17 related to real property or consumers located in the state of Washington equal to the  
18 amount collected from that Washington consumer for those services in an amount to  
19 be determined by Declaration with supporting documentation. This obligation shall  
20 also be joint and several with all other Respondents.
- 21 4. Respondents Jonathan P. Hanley and Sandra X. Hanley shall be jointly and severally  
22 liable for and shall pay a fine of Three Hundred Thousand Dollars (\$300,000.00). This  
23 obligation shall also be joint and several with all other Respondents.
- 24 5. Respondents Jonathan P. Hanley and Sandra X. Hanley shall jointly and severally pay  
to the Department an investigation fee in the amount of Three Thousand Eighty Six  
Dollars and Forty Cents (\$3,086.40). This obligation shall also be joint and several  
with all other Respondents.
6. Respondents Jonathan P. Hanley and Sandra X. Hanley shall maintain records in  
compliance with the Act and provide the Department with the 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  
telephone number of the individual responsible for maintenance of such records in  
compliance with the Act. This obligation shall also be joint and several with all other  
Respondents.

1           7. Respondents Jonathan P. Hanley and Sandra X. Hanley shall pay the Department's  
2           costs and expenses for prosecuting violations of the Act in an amount to be determined  
3           by Declaration with supporting documentation.

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

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

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

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

19           E.     Non-compliance with Order. If you do not comply with the terms of this order,  
20           including payment of any amounts owed within thirty (30) days of receipt of this order, the  
21           Department may seek its enforcement by the Office of the Attorney General to include the collection  
22           of the fine, fee, costs and expenses, refunds, and restitution imposed herein. The Department also  
23           may assign the amounts owed to a collection agency for collection.

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

4 DATED this 3rd day of March, 2020.

6 STATE OF WASHINGTON  
7 DEPARTMENT OF FINANCIAL INSTITUTIONS

8 /s/  
9 CATHERINE MELE HETTER  
10 Deputy Director

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 PREFERRED LAW PLLC a/k/a  
6 CONSUMER DEFENSE LLC a/k/a  
7 CONSUMER LINK, INC. a/k/a  
8 AMERICAN LOAN COUNSELORS a/k/a  
9 MODIFICATION REVIEW BOARD,  
JONATHAN P. HANLEY, manager,  
SANDRA X. HANLEY, manager,  
BENJAMIN R. HORTON, manager.

Respondents.

No. C-17-2289-18-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

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

17 I. FACTUAL ALLEGATIONS

18 1.1 Respondents.

19 A. Respondent Preferred Law PLLC (Respondent Preferred Law) has never been  
20 licensed by the Department of Financial Institutions of the State of Washington (Department) to  
21 conduct business as a mortgage broker.

22 B. Respondent Consumer Defense LLC (Respondent Consumer Defense) has never  
23 been licensed by the Department of Financial Institutions of the State of Washington (Department) to  
24 conduct business as a mortgage broker.



1           **C. Respondent Consumer Link, Inc. (Respondent Consumer Link)** has never been  
2 licensed by the Department of Financial Institutions of the State of Washington (Department) to  
3 conduct business as a mortgage broker.

4           **D. Respondent American Loan Counselors (Respondent ALC)** has never been  
5 licensed by the Department of Financial Institutions of the State of Washington (Department) to  
6 conduct business as a mortgage broker.

7           **E. Respondent Modification Review Board (Respondent MRB)** has never been  
8 licensed by the Department of Financial Institutions of the State of Washington (Department) to  
9 conduct business as a mortgage broker.

10          **F. Respondent Entities.** Respondents Preferred Law, Consumer Defense, Consumer  
11 Link, ALC, and MRB operated collectively in a common enterprise or scheme as it relates to these  
12 factual allegations.

13          **G. Respondent Jonathan P. Hanley (Respondent Jonathan Hanley)** is or was a  
14 managing member of Respondent Entities. During the relevant period, Respondent Jonathan Hanley  
15 was not licensed by the Department to conduct business as a mortgage broker or loan originator.

16          **H. Respondent Susan X. Hanley (Respondent Susan Hanley)** is or was a managing  
17 member of Respondent Entities. During the relevant period, Respondent Susan Hanley was not  
18 licensed by the Department to conduct business as a mortgage broker or loan originator.

19          **I. Respondent Benjamin R. Horton (Respondent Horton)** is or was a managing  
20 member of Respondent Entities. During the relevant period, Respondent Horton was not licensed by  
21 the Department to conduct business as a mortgage broker or loan originator.

22 **1.2 Unlicensed Activity.** Between at least November 2011 and January 2018, Respondents were  
23 offering residential mortgage loan modification services to Washington consumers for properties  
24 located in Washington State. Respondents entered into contractual relationships, or otherwise held

1 themselves out to be able to perform loan modification services, with approximately 129 Washington  
2 consumers to provide those services. The consumers with whom Respondents conducted business as  
3 mortgage brokers are identified Attachment A.

4 **1.3 Advance Fee Violations.** On at least four occasions, Respondents collected an advance fee  
5 for the provision of those services. The consumers with whom Respondents conducted business as a  
6 mortgage broker, and the amount paid is identified in Attachment B.

7 **1.4 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 **1.5 Failure to Comply with the Department's Investigative Authority.** On or about November  
11 21, 2017, the Department issued a Subpoena to Respondents. The time and manner by which  
12 Respondents were obligated to reply to the Subpoena's request for information were identified. The  
13 deadline to respond was identified as December 21, 2017. Respondents have not to date submitted a  
14 complete response to the Department's Subpoena.

15 **1.6 On-Going Investigation.** The Department's investigation into Respondents' alleged  
16 violations of the Act 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" means  
19 any person who for direct or indirect compensation or gain, or in the expectation of direct or indirect  
20 compensation or gain (a) assists a person in obtaining or applying to obtain a residential mortgage  
21 loan or performs residential mortgage loan modification services or (b) holds himself or herself out as  
22 being able to assist a person in obtaining or applying to obtain a residential mortgage loan or provide  
23 residential mortgage loan modification services."

24 //

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

5 **2.3 Prohibited Acts.** Based on the Factual Allegations set forth in Section I above, Respondents  
6 are in apparent violation of RCW 19.146.0201(1), (2) & (3) for engaging in an unfair or deceptive  
7 practice toward any person and obtaining property by fraud or misrepresentation.

8 **2.4 Requirement to Obtain and Maintain Mortgage Broker 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 mortgage broker for Washington residents or property without first  
11 obtaining a license to do so.

12 **2.5 Requirement to Obtain and Maintain Loan Originator License.** Based on the Factual  
13 Allegations set forth in Section I above, Respondents Jonathan Hanley, Sandra Hanley, and Benjamin  
14 Horton are in apparent violation of RCW 19.146.200(1) for engaging in the business of a loan  
15 originator without first obtaining and maintaining a license.

16 **2.6 Prohibition against Taking Advance Fees.** Based on the Factual Allegations set forth in  
17 Section I above, Respondents are in apparent violation of RCW 19.146.0201(11) and 16 CFR 322.5  
18 (MARS Rule) remodified as 12 CFR 1015 (Regulation O), for taking advance fees for loan  
19 modification services.

20 **2.7 Requirement to Comply with the Department’s Investigative Authority.** Based on the  
21 Factual Allegations set forth in Section I above, Respondents are in apparent violation of  
22 RCW 19.146.235(2) for failing to comply with the Department’s investigative authority.

23 //

24 //



1 X. Hanley, Benjamin R. Horton be prohibited from participation, in any manner, in the  
2 conduct of the affairs of any mortgage broker subject to licensure by the Director for a  
period of five years.

3 **4.3** Respondents Preferred Law PLLC, Consumer Defense LLC, Consumer Link, Inc.,  
4 American Loan Counselors, Modification Review Board, Jonathan P. Hanley, Sandra  
5 X. Hanley, Benjamin R. Horton jointly and severally refund to the consumers  
6 identified by the Department in Appendix A in the amount of \$200,000.00  
7 collectively, and that Respondents jointly and severally refund to each Washington  
8 consumer with whom they entered into a contract for residential mortgage loan  
9 modification services related to real property or consumers located in the state of  
10 Washington equal to the amount collected from that Washington consumer for those  
11 services to be determined at hearing or by Declaration with supporting documentation  
12 in event of default by Respondents.

13 **4.4** Respondents Preferred Law PLLC, Consumer Defense LLC, Consumer Link, Inc.,  
14 American Loan Counselors, Modification Review Board, Jonathan P. Hanley, Sandra  
15 X. Hanley, Benjamin R. Horton jointly and severally pay a fine, which as of the date  
16 of this Statement of Charges totals \$300,000.00.

17 **4.5** Respondents Preferred Law PLLC, Consumer Defense LLC, Consumer Link, Inc.,  
18 American Loan Counselors, Modification Review Board, Jonathan P. Hanley, Sandra  
19 X. Hanley, Benjamin R. Horton jointly and severally pay an investigation fee, which  
20 as of the date of this Statement of Charges totals \$3,086.4.

21 **4.6** Respondents Preferred Law PLLC, Consumer Defense LLC, Consumer Link, Inc.,  
22 American Loan Counselors, Modification Review Board, Jonathan P. Hanley, Sandra  
23 X. Hanley, Benjamin R. Horton maintain records in compliance with the Act and  
24 provide the Department with the 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 telephone number of the individual  
responsible for maintenance of such records in compliance with the Act.

**4.7** Respondents pay the Department's costs and expenses for prosecuting violations of the  
Act in an amount to be determined at hearing or by Declaration with supporting  
documentation in event of default by Respondents.

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1 **V. AUTHORITY AND PROCEDURE**

2 This Statement of Charges and Notice of Intent to Enter an Order to Cease and Desist  
3 Business, Prohibit From Industry, Order Refunds, Impose Fine, Collect Investigation Fee, and  
4 Recover Costs and Expenses is entered pursuant to the provisions of RCW 19.146.220, RCW  
5 19.146.221, RCW 19.146.223, and RCW 19.146.230, and is subject to the provisions of chapter  
6 34.05 RCW (The Administrative Procedure Act). Respondents may make a written request for a  
7 hearing as set forth in the NOTICE OF OPPORTUNITY FOR ADJUDICATIVE HEARING AND  
8 TO DEFEND accompanying this Statement of Charges.

9  
10 Dated this 13<sup>th</sup> day of JULY, 2018.

11  
12  
13 /s/  
14 CHARLES E. CLARK  
15 Director, Division of Consumer Services  
16 Department of Financial Institutions

17 Presented by:

18  
19 /s/  
20 IGOR VOLOSHIN  
21 Financial Legal Examiner

22 Approved by:

23 /s/  
24 STEVEN C. SHERMAN  
Enforcement Chief

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

APPENDIX A

CONSUMER	FEE PAID
V.A.	\$5,796
T.A	\$600
K.A	\$4,158
I.A.	\$1,300
R.A.	\$3,450
R.A.	\$3,900
C.B.	\$6,237
P.B.	\$3,120
R.B.	\$1,000
D.B.	\$5,381
I.C.	\$9,411
D.C.	\$2,600
J.C.	\$1,900
H.C.	\$1,650
R.C.	\$3,900
L.C.	\$7,792
M.C.	\$3,900
G.C.	\$1,485
M.C.	\$650
M.C.	\$3,900
M.C.	\$650
J.C.	\$1,300
D.D.	\$5,088
W.D.	\$4,464
M.F.	\$3,900
R.F.	\$4,490
R.F.	\$600
W.G.	\$3,900
F.G.	\$2,079
R.G.	\$3,250
B.G.	\$4,525
F.G.	\$1,000
D.G.	\$1,900
P.H.	\$3,922
D.H.	\$3,897

J.H.	\$5,385
R.J.	\$4,125
T.K.	\$650
S.L.	\$6,534
B.L.	\$3,896
S.M.	\$1,188
R.M.	\$3,900
D.M.	\$3,900
K.M.	\$4,494
F.M.	\$4,550
E.M.	\$750
T.P.	\$1,782
J.P.	\$4,996
A.R.	\$925
C.R.	\$1,780
L.S.	\$1,194
R.S.C.	\$3,900
K.P.	\$2,950
S.S.	\$650
M.S.	\$3,900
R.S.	\$2,450
T.T.	\$4,821
L.T.	\$8,510
M.V.	\$3,000
L.W.	\$3,900
S.W.	\$2,675
D.W.	\$5,049
C.Z.	\$2,673



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

APPENDIX B

CONSUMER	ADVANCE FEE PAID
M.C.	\$650
R.G.	\$650
J.N.	\$1,300
S.W.	\$650