

**ORDER SUMMARY – Case Number: C-17-2303**

**Name(s):** DRLS LLC; Dunn Wright Legal; Conner McMiniment

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**Order Number:** C-17-2303-19-FO01

**Effective Date:** 10/04/2019

**License Number:** UL - NMLS ID: Entity 1912712, Individual 1912711  
**Or NMLS Identifier [U/L]**

**License Effect:**  
\_\_\_\_\_  
\_\_\_\_\_

**Not Apply Until:**  
\_\_\_\_\_

**Not Eligible Until:**  
\_\_\_\_\_

**Prohibition/Ban Until:** 5 years

<b>Investigation Costs</b>	\$ 2,000		Paid <input type="checkbox"/> Y <input checked="" type="checkbox"/> N	Date
<b>Fine</b>	\$ 20,000	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>	\$7,612	Due	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 type="checkbox"/> N	Date
	No. of Victims:			

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

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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:

No.: C-17-2303-19-FO01

5 DUNN WRIGHT LEGAL, LLC,  
6 DRLS, LLC, and  
CONNER E. MCMINIMENT A/K/A  
7 CONNER O'SHEA, Principal,

FINAL ORDER

8 Respondents.

9 **I. DIRECTOR'S CONSIDERATION**

10 A. Default. This matter has come before the Director of the Department of Financial  
11 Institutions of the State of Washington (Director), through his designee, Consumer Services Division  
12 Acting Director Richard St. Onge (Director's designee), pursuant to RCW 34.05.440(1). On June 21,  
13 2019, the Director, through the Director's designee, issued a Statement of Charges and Notice of  
14 Intention to Enter an Order to Cease and Desist Business, Prohibit from Industry, Order Restitution,  
15 Impose Fine, Collect Investigation Fee, and Recover Costs and Expenses (Statement of Charges)  
16 against Dunn Wright Legal, LLC; DRLS, LLC; and Conner E. McMiniment a/k/a Conner O'Shea  
17 (Respondents). A copy of the Statement of Charges is attached and incorporated into this order by  
18 this reference. The Statement of Charges was accompanied by a cover letter dated June 25, 2019, a  
19 Notice of Opportunity to Defend and Opportunity for Hearing, and a blank Application for  
20 Adjudicative Hearing for Respondent (collectively, accompanying documents).

21 On June 25, 2019, the Department served Respondent with the Statement of Charges and  
22 accompanying documents by First-Class mail and were not returned to the Department by the United  
23 States Postal Service.

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

4 B. Record Presented. The record presented to the Director's designee for his review and  
5 for entry of a final decision included the following:

6 Statement of Charges, cover letter dated June 25, 2019, Notice of Opportunity to  
7 Defend and Opportunity for Hearing, and blank Application for Adjudicative  
Hearing for Respondent, with documentation for service.

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

10 II. FINAL ORDER

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

13 A. IT IS HEREBY ORDERED, That:

- 14 1. Respondents Dunn Wright Legal, LLC; DRLS, LLC; and Conner E. McMiniment  
15 a/k/a Conner O'Shea cease and desist engaging in the business of a mortgage  
broker or loan originator.
- 16 2. Respondents Dunn Wright Legal, LLC; DRLS, LLC; and Conner E. McMiniment  
17 a/k/a Conner O'Shea are prohibited from participation, in any manner, in the  
18 conduct of the affairs of any mortgage broker subject to licensure by the  
Department for a period of five years.
- 19 3. Respondents Dunn Wright Legal, LLC; DRLS, LLC; and Conner E. McMiniment  
20 a/k/a Conner O'Shea jointly and severally pay restitution in the amounts of: \$1,000  
to Consumer C.B.; \$3,012 to Consumer J.C.; \$1,750 to Consumer K.S.; and  
\$1,850 to Consumer G.W.
- 21 4. Respondents Dunn Wright Legal, LLC; DRLS, LLC; and Conner E. McMiniment  
22 a/k/a Conner O'Shea jointly and severally pay a fine of \$20,000.
- 23 5. Respondents Dunn Wright Legal, LLC; DRLS, LLC; and Conner E. McMiniment  
24 a/k/a Conner O'Shea jointly and severally pay an investigation fee of \$2,000.

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2 6. Respondents Dunn Wright Legal, LLC; and DRLS, LLC, their officers,  
3 employees, and agents maintain records in compliance with chapter 19.146 RCW,  
4 the Mortgage Broker Practices Act (Act) and provide the Director with the  
5 location of the books, records and other information relating to Respondents Dunn  
6 Wright Legal, LLC's; and DRLS, LLC's; mortgage broker business, and the name,  
7 address and telephone number of the individual responsible for maintenance of  
8 such records in compliance with the Act.

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10 B. Reconsideration. Pursuant to RCW 34.05.470, Respondent has the right to file a  
11 Petition for Reconsideration stating the specific grounds upon which relief is requested. The Petition  
12 must be filed in the Office of the Director of the Department of Financial Institutions by courier at  
13 150 Israel Road SW, Tumwater, Washington 98501, or by U.S. Mail at P.O. Box 41200, Olympia,  
14 Washington 98504-1200, within ten (10) days of service of the Final Order upon Respondent. The  
15 Petition for Reconsideration shall not stay the effectiveness of this order nor is a Petition for  
16 Reconsideration a prerequisite for seeking judicial review in this matter.

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

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

23 D. Judicial Review. Respondent has the right to petition the superior court for judicial  
24 review of this agency action under the provisions of chapter 34.05 RCW. For the requirements for  
filing a Petition for Judicial Review, see RCW 34.05.510 and sections following.

E. Non-compliance with Order. If you do not comply with the terms of this order,  
**including payment of any amounts owed within 30 days of receipt of this order**, the Department  
may seek its enforcement by the Office of the Attorney General to include the collection of the fines,

1 fees, and restitution imposed herein. The Department also may assign the amounts owed to a  
2 collection agency for collection.

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

6 DATED this 4th day of October, 2019.

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8 STATE OF WASHINGTON  
DEPARTMENT OF FINANCIAL INSTITUTIONS

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10 /s/ \_\_\_\_\_  
RICHARD ST. ONGE  
Acting Director  
11 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:

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DUNN WRIGHT LEGAL, LLC,  
DRLS, LLC, and  
CONNER E. MCMINIMENT A/K/A  
CONNER O'SHEA, Principal,

Respondents.

No. C-17-2303-19-SC01

STATEMENT OF CHARGES and  
NOTICE OF INTENT TO ENTER AN  
ORDER TO CEASE AND DESIST  
BUSINESS, PROHIBIT FROM  
INDUSTRY, ORDER RESTITUTION,  
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 his designee, Division of Consumer Services Acting Director Richard St. Onge, institutes this proceeding and finds as follows:

**I. FACTUAL ALLEGATIONS**

**1.1 Respondents.**

**A. Respondent Dunn Wright Legal, LLC (Respondent Dunn Wright)** has never been licensed by the Department of Financial Institutions of the State of Washington (Department) to conduct business as a mortgage broker.

**B. Respondent DRLS, LLC (Respondent DRLS)** has never been licensed by the Department to conduct business as a mortgage broker.

1 **C. Respondent Conner E. McMiniment a/k/a Conner O’Shea (Respondent McMiniment)**

2 is a principal of Respondent Dunn Wright and Respondent DRLS. Respondent McMiniment has  
3 never been licensed by the Department to conduct business as a mortgage broker or loan originator.

4 **1.2 Unlicensed Activity.** Between at least May 2017 and August 2017, Respondents were  
5 offering residential mortgage loan modification services to Washington consumers on property located  
6 in Washington State. Respondents entered into a contractual relationship with at least four  
7 Washington consumers to provide those services and collected an advance fee for the provision of  
8 those services. The Department has received at least four complaints from Washington consumers  
9 alleging Respondents provided or offered to provide residential mortgage loan modification services  
10 while not licensed by the Department to provide those services. Consumer C.B. paid Respondents  
11 \$1,000 for loan modification services. Consumer J.C. paid Respondents \$3,012 for loan modification  
12 services. Consumer K.S. paid Respondents \$1,750 for loan modification services. Consumer G.W.  
13 paid Respondents \$1,850 for loan modification services.

14 **1.3 Misrepresentations and Omissions.** Respondents represented that they were licensed to  
15 provide the residential mortgage loan modification services or omitted disclosing that they were not  
16 licensed to provide those services.

17 **1.4 On-Going Investigation.** The Department’s investigation into the alleged violations of the  
18 Act by Respondents continues to date.

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

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

1 able to assist a person in obtaining or applying to obtain a residential mortgage loan or provide  
2 residential mortgage loan modification services.

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

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

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

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

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

### 21 III. AUTHORITY TO IMPOSE SANCTIONS

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



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

4 **3.3 Authority to Order Restitution.** Pursuant to RCW 19.146.220(2), the Director may order  
5 restitution 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 fines  
7 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 208-660-  
9 550(4)(a), the Department will charge \$48 per hour for an examiner's time devoted to an investigation  
10 of any person subject to the Act.

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

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

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

- 5 **4.1** Respondents Dunn Wright Legal, LLC; DRLS, LLC; and Conner E. McMiniment a/k/a  
6 Conner O'Shea cease and desist engaging in the business of a mortgage broker or loan  
7 originator.
- 8 **4.2** Respondents Dunn Wright Legal, LLC; DRLS, LLC; and Conner E. McMiniment a/k/a  
9 Conner O'Shea be prohibited from participation, in any manner, in the conduct of the  
10 affairs of any mortgage broker subject to licensure by the Director for a period of five  
11 years.
- 12 **4.3** Respondents Dunn Wright Legal, LLC; DRLS, LLC; and Conner E. McMiniment a/k/a  
13 Conner O'Shea jointly and severally pay restitution to the four consumers identified by  
14 the Department in paragraph 1.2 in the amount set forth therein, and that Respondents  
15 jointly and severally pay restitution to each Washington consumer with whom they  
16 entered into a contract for residential mortgage loan modification services related to  
17 real property or consumers located in the state of Washington equal to the amount  
18 collected from that Washington consumer for those services in an amount to be  
19 determined at hearing.
- 20 **4.4** Respondents Dunn Wright Legal, LLC; DRLS, LLC; and Conner E. McMiniment a/k/a  
21 Conner O'Shea jointly and severally pay a fine, which as of the date of this Statement  
22 of Charges totals \$20,000.
- 23 **4.5** Respondents Dunn Wright Legal, LLC; DRLS, LLC; and Conner E. McMiniment a/k/a  
24 Conner O'Shea jointly and severally pay an investigation fee, which as of the date of  
this Statement of Charges totals \$2,000.
- 4.6** Respondents Dunn Wright Legal, LLC; DRLS, LLC; and Conner E. McMiniment a/k/a  
Conner O'Shea 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.
- 4.7** Respondents Dunn Wright Legal, LLC; DRLS, LLC; and Conner E. McMiniment a/k/a  
Conner O'Shea 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 Respondent.

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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). Respondent(s) may make a written request for a hearing as  
5 set forth in the NOTICE OF OPPORTUNITY FOR ADJUDICATIVE HEARING AND TO DEFEND  
6 accompanying this Statement of Charges.

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8 Dated this 6th day of June, 2019.

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10 /s/  
11 RICHARD ST. ONGE  
12 Acting Director  
13 Division of Consumer Services

14 Presented by:

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

18 Approved by:

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