

**ORDER SUMMARY – Case Number: C-18-2557**

**Name(s):** eLink Mortgage LLC; Ge Zhou

**Order Number:** C-18-2557-20-CO01

**Effective Date:** 4/16/2020

**License Number:** 385463, 84681

**License Effect:** N/A

**Not Apply Until:** N/A

**Not Eligible Until:** N/A

**Prohibition/Ban Until:** N/A

<b>Investigation Costs</b>	\$5,906.97		Paid <input checked="" type="checkbox"/> Y <input type="checkbox"/> N	Date 4/16/20
<b>Fine</b>	\$50,000 \$20,000 STAYED	Due \$25,000	Paid <input type="checkbox"/> Y <input type="checkbox"/> N	Date \$5,000 paid
<b>Assessment(s)</b>	\$	Due	Paid <input type="checkbox"/> Y <input type="checkbox"/> N	Date
<b>Restitution</b>	\$	Due	Paid <input type="checkbox"/> Y <input 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: Respondents have agreed to cease and desist from violations cited in the Statement of Charges. Respondents' compliance with the consent order will be reviewed at eLink Mortgage LLC's next compliance examination. Respondent has paid \$5,000 towards the fine and has been ordered to pay another \$25,000 this year. The remaining \$20,000 of the fine is stayed contingent on Respondents' compliance with the consent order. Respondents have also agreed to obtain and maintain compliance software, which will help Respondents avoid repeating the violations cited in the Statement of Charges.

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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:

No.: C-18-2557-20-CO01

CONSENT ORDER

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ELINK MORTGAGE LLC, NMLS No. 385463,  
and  
GE ZHOU, President, Owner, and Designated  
Broker, NMLS No. 84681,

Respondents.

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COMES NOW the Director of the Department of Financial Institutions (Director), through his designee Lucinda Fazio, Division of Consumer Services Director, eLink Mortgage LLC and Ge Zhou, President, Owner, and Designated Broker of eLink Mortgage LLC (Respondents), and finding that the issues raised in the above-captioned matter may be economically and efficiently settled, agree to the entry of this Consent Order. This Consent Order is entered pursuant to chapter 19.146 of the Revised Code of Washington (RCW), and RCW 34.05.060 of the Administrative Procedure Act, based upon the following:

**AGREEMENT AND ORDER**

The Department of Financial Institutions, Division of Consumer Services (Department) and Respondents have agreed upon a basis for resolution of the matters alleged in Statement of Charges No. C-18-2557-19-SC01 (Statement of Charges), entered November 18, 2019, (copy attached hereto). Pursuant to chapter 19.146 RCW, the Mortgage Broker Practices Act (Act), and RCW 34.05.060 of the Administrative Procedure Act, Respondents hereby agree to the Department's entry of this Consent Order and further agree that the issues raised in the above-captioned matter may be economically and efficiently settled by entry of this Consent Order. The parties intend this Consent

1 Order to fully resolve the Statement of Charges and agree that Respondents neither admit nor deny  
2 any wrongdoing by its entry.

3 Based upon the foregoing:

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

6 B. **Waiver of Hearing.** It is AGREED that Respondents have been informed of the right to a  
7 hearing before an administrative law judge, and hereby waive their right to a hearing and any and all  
8 administrative and judicial review of the issues raised in this matter, or of the resolution reached  
9 herein. Accordingly, Respondents, by their signatures and the signatures of their representatives  
10 below, withdraw their appeal to the Office of Administrative Hearings.

11 C. **Agreement to Cease and Desist.** It is AGREED that Respondents shall cease and desist  
12 from the violations identified in the Statement of Charges, specifically including, but not limited to,  
13 operating unlicensed branch locations.

14 D. **Fine.** It is AGREED that Respondents shall pay a fine to the Department in the amount of  
15 \$50,000. Respondent shall pay \$5,000 of the fine upon delivery of this Consent Order to the  
16 Department, properly dated and signed, and shall make monthly payments as follows:

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<u>Payment Due Date</u>	<u>Payment Amount</u>
May 31, 2020	\$3,125
June 30, 2020	\$3,125
July 31, 2020	\$3,125
August 31, 2020	\$3,125
September 30, 2020	\$3,125
October 31, 2020	\$3,125
November 30, 2020	\$3,125
December 31, 2020	\$3,125

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1 All payments shall be in the form of a cashier's check made payable to "Washington State  
2 Treasurer." It is further AGREED that payment of \$20,000 of the fine is STAYED for six months  
3 following eLink Mortgage LLC's next compliance examination (Examination) contingent on  
4 Respondents' compliance with this Consent Order.

5 **E. Investigation Fee.** It is AGREED that Respondent shall pay to the Department an  
6 investigation fee of \$5,906.97 in the form of a cashier's check made payable to the "Washington  
7 State Treasurer," upon delivery of this Consent Order to the Department, properly dated and signed.  
8 The Investigation Fee and initial \$5,000 payment towards the fine may be paid together in one  
9 \$10,906.97 cashier's check made payable to the "Washington State Treasurer."

10 **F. Compliance Software.** It is AGREED that Respondents shall obtain compliance  
11 software not objectionable to the Department within 30 days of entry of this Consent Order and shall  
12 maintain such software for at least five years after entry of this Consent Order. Respondents further  
13 AGREE to run all of Respondents' residential mortgage broker loan business subject of the Act  
14 through the compliance software.

15 **G. Examination.** It is AGREED that:

- 16 1. The Department will review Respondents' compliance with this Consent Order at  
17 eLink Mortgage, LLC's next Examination.
- 18 2. eLink Mortgage, LLC's next Examination shall be scheduled based upon the  
19 Department's availability.
- 20 3. eLink Mortgage LLC's next Examination shall be considered a referral from  
21 Enforcement.
- 22 4. Respondents shall be liable for and shall pay all costs of Respondent's next  
23 Examination as authorized by WAC 208-660-510(8)(c) and WAC 208-660-550(3)(a).

1           **H. Lifting of Stay.** It is AGREED that:

- 2           1. If the Department determines Respondents have not complied with this Consent  
3           Order, and seeks to lift the stay and impose the \$20,000.00 stayed fine, the  
4           Department will first serve Respondents with a written notice of noncompliance.

5           The notice of noncompliance will include:

- 6                   i. A description of the alleged noncompliance;  
7                   ii. A statement that the Department seeks to lift the stay and impose the stayed  
8                   fine;  
9                   iii. Notice that Respondents can contest the allegations of noncompliance by  
10                  either requesting an adjudicative hearing in writing or by submitting a  
11                  written response to the allegations of noncompliance; and  
12                  iv. Notice that the process for lifting the stay applies only to this Consent  
13                  Order.
- 14           2. Respondents will be afforded twenty business days from the date of service of the  
15           notice of noncompliance to submit to the Department either a written request for an  
16           adjudicative hearing or a written response to the allegations of noncompliance.
- 17           3. The scope and issues of the adjudicative hearing are limited solely to whether or not  
18           Respondents have failed to comply with the terms of this Consent Order.
- 19           4. At the conclusion of the adjudicative hearing the Administrative Law Judge will  
20           issue an initial decision. Either party may subsequently file a Petition for Review  
21           with the Director of the Department.

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

**J. Non-Compliance with Order.** It is AGREED that Respondents understand that failure to  
abide by the terms and conditions of this Consent Order may result in further legal action by the

1 Director. In the event of such legal action, Respondents may be responsible to reimburse the Director  
2 for the cost incurred in pursuing such action, including but not limited to, attorney fees.

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

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

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

11 **RESPONDENTS:**

12 eLink Mortgage LLC

13 By:

14 /s/ \_\_\_\_\_  
15 Ge Zhou  
16 President, Owner, and Designated Broker

4-10-2020  
Date

17 /s/ \_\_\_\_\_  
18 Ge Zhou  
19 Individually

4-10-2020  
Date

20 Approved for Entry:

21 /s/ \_\_\_\_\_  
22 Charles R. Horner, WSBA No. 27504  
23 Law Offices of Charles R. Horner PLLC  
24 Attorney for Respondents

4-10-2020  
Date



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 ELINK MORTGAGE LLC, NMLS No. 385463,  
and  
6 GE ZHOU, President, Owner, and Designated  
Broker, NMLS No. 84681,

No. C-18-2557-19-SC01

STATEMENT OF CHARGES and  
NOTICE OF INTENT TO ENTER AN  
ORDER TO REVOKE LICENSE, PROHIBIT  
FROM INDUSTRY, IMPOSE FINE,  
COLLECT INVESTIGATION FEE, and  
RECOVER COSTS AND EXPENSES

7 Respondents.

8 **INTRODUCTION**

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

15 **I. FACTUAL ALLEGATIONS**

16 **1.1 Respondents.**

17 A. **eLink Mortgage LLC** (eLink) was licensed by the Department of Financial  
18 Institutions of the State of Washington (Department) to conduct business as a mortgage broker on or  
19 about January 24, 2011, and surrendered the license on or about December 20, 2013. eLink was  
20 licensed as a consumer loan company on or about December 20, 2013, and surrendered that license on  
21 about July 10, 2017. eLink was again licensed as a mortgage broker on or about December 30, 2016,  
22 and continues to be licensed as a mortgage broker to date.



1           B.       **Ge Zhou** is president and owner of eLink. Mr. Zhou has been designated broker for  
2 eLink since at least December 30, 2016, and continues to be designated broker to date. Mr. Zhou has  
3 also been licensed as a mortgage loan originator (MLO) since at least December 16, 2009.

4       **1.2     2018 Examination.** Between approximately September 10, 2018, and September 13, 2018,  
5 the Department conducted a compliance examination at Respondents’ office in Seattle, Washington  
6 (2018 Examination). At the 2018 Examination, the Department reviewed loan files originated  
7 between December 30, 2016, and August 31, 2018, as well as Respondents’ business and advertising  
8 practices. As a result of the Examination, the Department identified the violations described in  
9 Paragraphs 1.3 through 1.11 below.

10       **1.3     Unlicensed Branch Locations.** At all relevant times, eLink’s only licensed location was the  
11 main office in Seattle, Washington. During the 2018 Examination, Mr. Zhou admitted to the  
12 Department that MLOs accept loan applications while working from their homes. After the 2018  
13 Examination, six MLOs admitted under penalty of perjury that they accepted loan applications and  
14 offered loan terms while performing work for eLink at locations other than eLink’s main office.

15       **1.4     Recordkeeping.** Before the 2018 Examination, the Department instructed Respondents to  
16 produce copies of all documents that eLink gave to a sample of borrowers selected by the  
17 Department. Respondents did not produce several documents required, including at least three Loan  
18 Estimates and a Homeownership Housing Counseling Disclosure. After the examination,  
19 Respondents produced three Loan Estimates that Respondents had not previously produced and  
20 described them as the “correct original loan estimates” from “eLink’s archive.”

21       **1.5     Untimely Reports.** Between approximately February 19, 2017, and approximately May 20,  
22 2018, eLink filed eight mortgage call reports with the Department untimely, including six quarterly  
23 reports and two annual reports. The Department previously cited eLink for filing untimely mortgage

1 call reports in a letter dated April 27, 2016. As of the date of this Statement of Charges, eLink has  
2 also not timely filed its 2018 annual report.

3 **1.6 Unapproved Trade Names.** At all relevant times, eLink Mortgage was the only trade name  
4 that the Department had approved for eLink. Between September 4, 2018, and September 5, 2018,  
5 eLink advertised online using at least five trade names that the Department had not approved. The  
6 unapproved trade names include janenipius.com, mortgageloansbyconnie.com, wjloans.com,  
7 loanofficergantt.com, and virginialawson.com.

8 **1.7 Advertised without Displaying Required Information.** On at least eleven web pages  
9 advertising eLink, eLink and MLOs employed by eLink did not provide the eLink's license number,  
10 MLOs' license numbers, or links to the NMLS consumer access web page for eLink.

11 **1.8 Incomplete Rate Lock Agreements.** Between approximately April 7, 2017, and May 31,  
12 2018, eLink did not give borrowers a complete and accurate rate lock agreement on at least nine  
13 occasions, including two occasions when no rate lock agreement was provided. Seven of the rate  
14 lock agreements were incomplete because they did not disclose whether the rate was guaranteed and,  
15 if so, whether the rate was guaranteed by the mortgage broker or lender. The Department previously  
16 cited eLink for failing to provide complete rate lock agreements in a Report of Examination dated  
17 March 31, 2013.

18 **1.9 Incomplete Credit Score Disclosures.** Between approximately December 2, 2016, and April  
19 16, 2018, eLink gave at least 17 borrowers credit score disclosures that did not contain the following  
20 information: (1) How the borrower's credit score compares to that of other consumers, (2) Contact  
21 information the borrower can use to get a free annual credit report, and (3) Directions to the  
22 Consumer Financial Protection Bureau's website where the borrower can obtain more information  
23 about credit reports.

**1.10 Incomplete Homeownership Housing Counseling Disclosures.** Between approximately December 6, 2016, and April 16, 2018, eLink gave at least 16 borrowers Homeownership Housing Counseling Disclosures that did not provide a clear and conspicuous written list of housing counseling organizations that provide relevant counseling services in the borrower's location.

**1.11 Incomplete Loan Estimates.** Between approximately March 31, 2017, and April 16, 2017, eLink gave at least seven Loan Estimates to six borrowers that did not disclose when the estimate of closing costs expired, an email address and phone number for the MLO, and the name and NMLS number for the lender, mortgage broker, and MLO. At least five Loan Estimates also did not disclose whether a subsequent purchaser may assume the loan, a statement detailing any late fees, or a statement of whether the creditor intends to service the loan or transfer servicing.

**1.12 Compensation Plans.** At all relevant times, eLink brokered loans on behalf of eight lenders. For each loan brokered by eLink, the lender paid eLink a percentage of the loan amount. The percentage varied depending on the lender, with all lenders paying between 1.25% and 2% of the loan amount. Between at least June 2013 and September 2018, eLink paid over thirty MLOs by splitting the net fees that eLink earned in one of three ways:

<u>eLink Share</u>	<u>MLO Share</u>
Greater of \$400 or 20% of the net earned fees	Remainder of the net earned fees
Greater of \$600 or 30% of the net earned fees	Remainder of the net earned fees
Greater of \$600 or 40% of the net earned fees	Remainder of the net earned fees

As a result of eLink's compensation plans with lenders and MLOs, eLink paid MLOs more if the MLOs originated loans from lenders that paid eLink a higher percentage of the loan amount.<sup>1</sup>

<sup>1</sup> For example, an MLO earning 80% of the fees on a \$500,000 loan could earn \$5,000 if the lender paid eLink Mortgage LLC 1.25% of the loan amount or \$8,000 if the lender paid eLink Mortgage LLC 2% of the loan amount.

1 **1.13 On-Going Investigation.** The Department’s investigation into the alleged violations of the  
2 Act by Respondents continues to date.

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

4 **2.1 Responsibility for Conduct of Loan Originators.** Pursuant to RCW 19.146.245, a licensed  
5 mortgage broker is liable for any conduct violating the Act by the designated broker or a loan  
6 originator while employed or engaged by the licensed mortgage broker.

7 **2.2 Responsibility of Designated Broker.** Pursuant to RCW 19.146.200(3), every licensed  
8 mortgage broker must at all times have a designated broker responsible for all activities of the  
9 mortgage broker in conducting the business of a mortgage broker. A designated broker who has  
10 supervisory authority over a mortgage broker is responsible for a licensee’s, employee’s, or  
11 independent contractor’s violations of the Act if: (a) the designated broker instructs the conduct or,  
12 with knowledge of the specific conduct, approves or allows the conduct; or (b) the designated broker,  
13 who has supervisory authority over the licensed mortgage broker, knows or by the exercise of  
14 reasonable care and inquiry, should have known of the conduct, at a time when its consequences can  
15 be avoided or mitigated and fails to take reasonable remedial action.

16 **2.3 Definition of Borrower.** Pursuant to RCW 19.146.010(2), “Borrower” means any person  
17 who consults with or retains a mortgage broker or MLO in an effort to obtain or seek advice or  
18 information on obtaining or applying to obtain a residential mortgage loan, or residential mortgage  
19 loan modification, for himself, herself, or persons including himself or herself, regardless of whether  
20 the person actually obtains such a loan.

21 **2.4 Requirement to Obtain and Maintain Branch License.** Based on the Factual Allegations  
22 set forth in Section I above, Respondents are in apparent violation of RCW 19.146.265 and WAC  
23 208-660-195 for engaging in the business of a mortgage broker from a location not licensed by the  
24 Department.

1 **2.5 Unlicensed Location.** Based on the Factual Allegations set forth in Section I above,  
2 Respondents are in apparent violation of RCW 19.146.0201(16) and WAC 208-660-300(4) for  
3 originating loans from any unlicensed location.

4 **2.6 Recordkeeping.** Based on the Factual Allegations set forth in Section I above, Respondents  
5 are in apparent violation of RCW 19.146.060(2) and WAC 208-660-450(1)(a) for not maintaining  
6 accurate and current books and records that are readily available at a location available to the  
7 director.

8 **2.7 Untimely Reports.** Based on the Factual Allegations set forth in Section I above,  
9 Respondents are in apparent violation of RCW 19.146.390 for not submitting call reports through the  
10 NMLS in a form and containing information as prescribed by the director or as deemed necessary by  
11 the NMLS.

12 **2.8 Unapproved Trade Names.** Based on the Factual Allegations set forth in Section I above,  
13 Respondents are in apparent violation of RCW 19.146.0201(2) and WAC 208-660-445 for  
14 advertising online using a URL address that is not the company's licensed business name or a DBA  
15 name approved by the Department.

16 **2.9 Advertised without Displaying Required Information.** Based on the Factual Allegations  
17 set forth in Section I above, Respondents are in apparent violation of RCW 19.146.0201(2) and (11)  
18 and WAC 208-660-446(1)(b), (3), (4)(a), and (4)(c) for advertising without displaying the company's  
19 license number, MLOs' license numbers, and links to the NMLS consumer access web page for the  
20 company.

21 **2.10 Incomplete Rate Lock Agreements.** Based on the Factual Allegations set forth in Section I  
22 above, Respondents are in apparent violation of RCW 19.146.030(2)(c) for not providing borrowers  
23 with written disclosure stating whether a specific interest rate has been guaranteed, and if so, whether  
24 the rate is guaranteed by the mortgage broker or lender.

1 **2.11 Incomplete Credit Score Disclosures.** Based on the Factual Allegations set forth in Section  
2 I above, Respondents are in apparent violation of RCW 19.146.0201(11) for not providing a risk-  
3 based pricing notice or a credit score disclosure to borrowers that contained information required by  
4 12 C.F.R. § 1022.74(d)(i), (d)(ii)(E), and (d)(ii)(G) through (I).

5 **2.12 Incomplete Homeownership Housing Counseling Disclosures.** Based on the Factual  
6 Allegations set forth in Section I above, Respondents are in apparent violation of RCW  
7 19.146.0201(11) for not providing borrowers with disclosures that contained information required by  
8 12 C.F.R. § 1024.20(a)(1).

9 **2.13 Incomplete Loan Estimates.** Based on the Factual Allegations set forth in Section I above,  
10 Respondents are in apparent violation of RCW 19.146.0201(11) for providing Loan Estimates to  
11 borrowers that did not include information required by 12 C.F.R. §§ 1026.19(e)(1)(ii) and  
12 1026.37(a)(13)(ii), (k), and (m)(2), (4), and (6).

13 **2.14 Compensation Plans.** Based on the Factual Allegations set forth in Section I above,  
14 Respondents are in apparent violation of RCW 19.146.0201(11) by paying MLOs compensation in an  
15 amount that is based on a term of the transaction in violation of 12 C.F.R. § 1026.36(d)(1)(i).

### 16 III. AUTHORITY TO IMPOSE SANCTIONS

17 **3.1 Authority to Issue an Order to Cease and Desist or Take Affirmative Action.** Pursuant to  
18 RCW 19.146.220(3), the Director may issue orders directing a licensee, its employee, loan originator,  
19 independent contractor, agent, or other person subject to the Act to cease and desist from conducting  
20 business or take such other affirmative action as is necessary to comply with this chapter.

21 **3.2 Authority to Suspend License.** Pursuant to RCW 19.146.220(2), the Director may suspend  
22 licenses for any violation of the Act.

23 **3.3 Authority to Impose Fine.** Pursuant to RCW 19.146.220(2), the Director may impose fines  
24 against a licensee for any violation of the Act.

1 **3.4 Authority to Collect Investigation Fee.** Pursuant to RCW 19.146.228(2), WAC 208-660-  
2 520(9) and (11), and WAC 208-660-550(4)(a), the Department will charge forty-eight dollars per  
3 hour for an examiner's time devoted to an investigation.

4 **3.5 Authority to Recover Costs and Expenses.** Pursuant to RCW 19.146.221(2), the Director  
5 may recover the state's costs and expenses for prosecuting violations of the Act.

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

7 Respondents' violations of the provisions of chapter 19.146 RCW and chapter 208-660 WAC,  
8 as set forth in the above Factual Allegations, Grounds for Entry of Order, and Authority to Impose  
9 Sanctions, constitute a basis for the entry of an Order under RCW 19.146.220, RCW 19.146.221, and  
10 RCW 19.146.223. Therefore, it is the Director's intent to ORDER that:

11 **4.1** Respondents eLink Mortgage LLC and Ge Zhou cease and desist from the violations  
12 cited in Section II above and take affirmative action necessary to conduct business in a  
manner that complies with the Act.

13 **4.2** Respondent eLink Mortgage LLC's license to conduct business as a mortgage broker  
14 be revoked.

15 **4.3** Respondents eLink Mortgage LLC and Ge Zhou pay a fine. As of the date of this  
Statement of Charges, the fine totals \$60,000.

16 **4.4** Respondents eLink Mortgage LLC and Ge Zhou pay an investigation fee. As of the  
17 date of this Statement of Charges, the investigation fee totals \$2,702.40.

18 **4.5** Respondents eLink Mortgage LLC and Ge Zhou maintain records in compliance with  
19 the Act and provide the Department with the location of the books, records and other  
information relating to Respondents' mortgage broker business, and the name, address  
20 and telephone number of the individual responsible for maintenance of such records in  
compliance with the Act.

21 **4.6** Respondents eLink Mortgage LLC and Ge Zhou pay the Department's costs and  
22 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  
4 34.05 RCW (the Administrative Procedure Act). Respondents 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 Statement of Charges.

7  
8 Dated this 18th day of November, 2019.

9  
10 /s/ \_\_\_\_\_  
11 RICHARD ST. ONGE  
12 Acting Director  
13 Division of Consumer Services  
14 Department of Financial Institutions

15 Presented by:

16 /s/ \_\_\_\_\_  
17 AMANDA J. HERNDON  
18 Financial Legal Examiner

19 Approved by:

20 /s/ \_\_\_\_\_  
21 STEVEN C. SHERMAN  
22 Enforcement Chief