

ORDER SUMMARY – Case Number: C-20-2949Name(s): Ms. Amy Hsin Ju Wong; Homelink Mortgage, Inc.Order Number: C-20-2949-21-CO01Effective Date: May 14, 2021License Number: Homelink - 63201; Wong - 68705
Or NMLS Identifier [U/L]License Effect: Stayed RevocationsNot Apply Until: n/aNot Eligible Until: n/aProhibition/Ban Until: Stayed Prohibitions

Investigation Costs	\$ 575		Paid <input checked="" type="checkbox"/> Y <input type="checkbox"/> N	Date 05/07/2021
Fine	\$20,000	Due	Paid <input checked="" type="checkbox"/> Y <input type="checkbox"/> N	Date 05/07/2021
Stayed Fine	\$10,000	Due - Stayed	Paid <input type="checkbox"/> Y <input checked="" type="checkbox"/> N	Date Stayed 3 years
Restitution	\$	Due	Paid <input type="checkbox"/> Y <input 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:			

Comments: Technical Assistance Exam in 9-12 months.Compliance Exam after Technical Assistance Exam, but within 2 years of CO.

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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-20-2949-21-CO01

CONSENT ORDER

HOMELINK MORTGAGE, INC.,
NMLS #63201, and
AMY HSIN JU WONG, President, Owner, and
Designated Broker, NMLS #68705,

Respondents.

COMES NOW the Director of the Department of Financial Institutions (Director), through his
designee Lucinda Fazio, Division of Consumer Services Director, and Homelink Mortgage, Inc.
(Respondent Homelink) and Amy Hsin Ju Wong (Respondent Wong), 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 on 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-20-2949-20-SC01 (Statement of Charges), entered January 28, 2021, (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
Order to fully resolve the Statement of Charges.

1 Based upon the foregoing:

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

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

9 **C. Cease and Desist.** It is AGREED that Respondents will cease and desist from engaging in
10 conduct that violates the Act, including, but not limited to, the violations identified in the Statement
11 of Charges and the most recent Report of Examination provided to Respondents by the Department
12 prior to entering this Consent Order.

13 **D. Mortgage Loan Originator License Revocation (Stayed).** It is AGREED that
14 Respondent Homelink's Washington mortgage broker license is revoked. It is FURTHER AGREED
15 that the revocation shall be stayed (Stayed Revocation) for three years from the date of entry of this
16 Consent Order contingent upon compliance with this Consent Order, compliance with the Act, and
17 the results of the examination described in Paragraph I. If the Department does not seek to lift the
18 stay and impose the Stayed Revocation pursuant to Paragraph J, the Stayed Revocation shall expire
19 without further notice or action by the Department.

20 **E. Prohibition from Industry (Stayed).** It is AGREED that, for a period of three years from
21 the date of entry of this Consent Order, Respondent Wong is prohibited from participating, in any
22 capacity, in the conduct of the affairs of any mortgage broker licensed by the Department or subject
23 to licensure or regulation by the Department. It is FURTHER AGREED that the prohibition shall be

1 stayed (Stayed Prohibition) for three years from the date of entry of this Consent Order contingent
2 upon compliance with this Consent Order, compliance with the Act, and the results of the
3 examination described in Paragraph I. If the Department does not seek to lift the stay and impose the
4 Stayed Prohibition pursuant to Paragraph J, the Stayed Prohibition shall expire without further notice
5 or action by the Department.

6 **F. Fine (Partially Stayed).** It is AGREED that Respondents shall pay a fine to the
7 Department in the amount of \$30,000. It is FURTHER AGREED that \$10,000 of the fine (Stayed
8 Fine) shall be stayed for three years from the date of entry of this Consent Order contingent upon
9 compliance with this Consent Order, compliance with the Act, and the results of the examination
10 described in Paragraph I. The Stayed Fine shall expire without further action or notice by the
11 Department if the Department does not seek to lift the stay and impose the Stayed Fine pursuant to
12 Paragraph J.

13 **G. Investigation Fee.** It is AGREED that Respondent shall pay to the Department an
14 investigation fee of \$575, in the form of a cashier's check made payable to the "Washington State
15 Treasurer." The non-stayed portion of the fine and the investigation fee shall be paid together in the
16 form of one cashier's check for \$20,575, made payable to the "Washington State Treasurer," upon
17 delivery of this Consent Order to the Department, properly dated and signed.

18 **H. Technical Assistance Examination.** It is AGREED that the Department may conduct a
19 technical assistance examination of Respondent Homelink's business practices, focused on the
20 violations identified in the most recent Report of Examination provided to Respondents by the
21 Department prior to entering this Consent Order. The technical assistance examination will be at
22 Respondent Homelink's expense and may be scheduled within the Department's discretion between
23 9 and 12 months after the entry of this Consent Order. This technical assistance examination is not

1 intended to have an effect on the Stayed Revocation, Stayed Prohibition, or Stayed Fine (Stayed
2 Sanctions) referenced in this Consent Order, will not result in a Risk Rating, and will not be used to
3 lift the stays imposed herein.

4 **I. Compliance Examination.** It is AGREED that subject to the Department's availability
5 and at Respondent Homelink's expense, the Department will conduct a compliance examination of
6 Respondents' business practices, policies, and procedures, including Respondents' compliance with
7 this Consent Order. The compliance examination will take place after the technical assistance
8 examination but within two years of the entry of this Consent Order. The review period for the
9 compliance examination will be the period between the technical assistance examination and the
10 start of the compliance examination. At the conclusion of the compliance examination, a Risk Rating
11 will be generated by the Department. It is further AGREED and ORDERED that a Risk Rating of 1
12 or 2 will result in the Stayed Sanctions expiring without further notice or action by the Department; a
13 Risk Rating of 3 *may* result in the Department lifting the stays and imposing the Stayed Sanctions on
14 Respondents pursuant to Paragraph J; and a Risk Rating of 4 or 5 *will* result in the Department lifting
15 the stays, imposing the Stayed Sanctions on Respondents pursuant to Paragraph J, and may result in
16 the imposition of other sanctions.

17 **J. Lifting Stays and Imposition of the Stayed Sanctions.** It is AGREED that:

- 18 1. If, during the three-year period of the stays, the Department determines that
19 Respondents have not complied with the Act or this Consent Order, or if Respondent
20 Homelink receives an examination rating of 3, 4, or 5 after the compliance
21 examination identified in Paragraph I, the Department may lift the stays and impose
22 the Stayed Sanctions.

- 1 2. If the Department seeks to lift the stays and impose the Stayed Sanctions, the
2 Department will first serve Respondents with a written notice of alleged
3 noncompliance.
- 4 3. The notice will include:
- 5 i. A description of the alleged noncompliance;
- 6 ii. A statement that the Department seeks to lift the stays and impose the Stayed
7 Sanctions;
- 8 iii. Notice that Respondents can contest the notice of alleged noncompliance by
9 either requesting an adjudicative hearing before an ALJ from OAH or by
10 submitting a written response to the Department contesting the alleged
11 noncompliance; and
- 12 iv. Notice that the process for lifting the stays applies only to this Consent Order.
- 13 4. Respondents have 20 days from the date of service of the notice of alleged
14 noncompliance to submit a written request to the Department for an adjudicative
15 hearing.
- 16 5. The scope and issues of the adjudicative hearing are limited solely to whether or not
17 Respondents are in violation of the terms of the Act or this Consent Order, or that
18 Respondents received an examination rating of 3, 4, or 5.
- 19 6. At the conclusion of the adjudicative hearing, the ALJ will issue an initial decision.
20 Any party may file a Petition for Review of that initial decision with the Director of
21 the Department.
- 22 7. DEFAULT. If Respondents do not timely request an adjudicative hearing or submit a
23 written response contesting the notice of alleged noncompliance, the Department may

1 lift the stays and impose the Stayed Sanctions without further notice.

2 **K. Internal Compliance Officer.** It is AGREED that Respondents shall continuously
3 employ a full-time internal compliance officer to supervise Respondents' employees and ensure
4 compliance with the Act and related laws and rules.

5 **L. Change of Address.** It is AGREED that for the duration of the period this Consent Order
6 is in effect, unless otherwise agreed to in writing by the Department, Respondents shall provide the
7 Department with a mailing address and telephone number at which Respondents can be contacted and
8 Respondents shall notify the Department in writing of any changes to their mailing address or
9 telephone number within fifteen days of any such change.

10 **M. Authority to Execute Order.** It is AGREED that the undersigned have represented and
11 warranted that they have the full power and right to execute this Consent Order on behalf of the
12 parties represented.

13 **N. Non-Compliance with Order.** It is AGREED that Respondents understand that failure to
14 abide by the terms and conditions of this Consent Order may result in further legal action by the
15 Director. In the event of such legal action, Respondents may be responsible to reimburse the Director
16 for the cost incurred in pursuing such action, including but not limited to, attorney fees.

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

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

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

1 **RESPONDENTS:**

Homelink Mortgage, Inc., by:

2
3 /s/
4 Amy Hsin Ju Wong
President

4/30/2021
Date

5
6 /s/
Amy Hsin Ju Wong
Individually
7 Approved for Entry:

4/30/2021
Date

8
9 /s/
Jessica Creager, WSBA No. 42183
Attorney at Law
10 Seattle Litigation Group, PLLC
11 Attorney for Respondents

5/3/2021
Date

12 **DO NOT WRITE BELOW THIS LINE**

13 THIS ORDER ENTERED THIS 14th DAY OF May, 2021.

14
15 /s/
LUCINDA FAZIO, Director
16 Division of Consumer Services
Department of Financial Institutions

17 Presented by:

18
19 /s/
DREW STILLMAN
20 Financial Legal Examiner

21 Approved by:

22
23 /s/
STEVEN C. SHERMAN
Enforcement Chief

1 **1.2 Examination.** Between May 11, 2020, and May 18, 2020, the Department examined the
2 books and records of Respondents for the period of June 1, 2018, through April 30, 2020. The
3 examination revealed multiple violations of the Act, including those identified below.

4 **1.3 Failed to comply with Consent Order.** In May 2018, the Department and Respondents
5 entered into Consent Order No. C-16-2018-18-CO01 (the “Consent Order”), in which it was ordered
6 and agreed that Respondents hire a full-time internal compliance officer to supervise Respondents’
7 employees and ensure compliance with the Act and related laws and rules. Respondents violated the
8 terms of the Consent Order by failing to hire a full-time internal compliance officer.

9 **1.4 Failed to display required information in advertisements.** In at least five advertisements,
10 Respondents failed to ensure that the advertisement included a link to the NMLS Consumer Access
11 website. In at least two advertisements, Respondents failed to ensure that the advertisements
12 displayed all required license numbers.

13 **1.5 Advertised using disallowed and misleading phrases.** In at least five advertisements,
14 Respondents failed to ensure that the advertisements did not use disallowed and misleading phrases.
15 In at least two advertisements, Respondents inappropriately advertised using terms or phrases that
16 implies there is no cost to the applicant. In at least three advertisements, Respondents inappropriately
17 described rates as “lowest,” “best,” or other similar words.

18 **1.6 Engaged in misleading and deceptive practices.** Respondents issued a letter to a borrower
19 that stated: “By verification of income, credit and assets, we are pleased to inform you that your loan
20 application on the above property has been pre-approved.” Contrary to this statement, Respondents
21 had not reviewed income, credit, and assets, or completed underwriting on the file, prior to the
22 letter’s issuance.

23 **1.7 Failed to adhere to tolerance limits and provide timely disclosure of fees.** In at least five
24 instances, Respondents imposed on borrowers closing costs that impermissibly exceeded the amounts

1 originally disclosed. Respondents also failed to disclose revised fees to at least two borrowers within
2 three business days of the change.

3 **1.8 Failed to provide a complete and accurate loan estimate.** In at least four instances,
4 Respondents failed to provide borrowers with complete and accurate loan estimates.

5 **1.9 Failed to provide a complete variable rate program disclosure.** Respondents failed to
6 provide at least one borrower with a complete variable rate program disclosure.

7 **1.10 Failed to provide or to timely provide home equity line of credit (HELOC) disclosure.**
8 Respondents failed to provide at least two borrowers with a HELOC disclosure within three business
9 days of accepting a complete residential mortgage loan application.

10 **1.11 Failed to develop a compliant mortgage loan originator compensation agreement.**
11 Respondents inappropriately entered into compensation agreements with mortgage loan originators
12 that agreed to compensate the mortgage loan originators based on a term of a transaction.

13 **1.12 Failed to develop a compliant anti-money laundering program.** Respondents failed to
14 develop and implement a written anti-money laundering program that is reasonably designed to
15 prevent Respondent Homelink Mortgage from being used to facilitate money laundering or the
16 financing of terrorist activities.

17 **1.13 Failed to include required information on residential mortgage loan application.**
18 Respondents provided at least one borrower with a residential mortgage loan application that failed to
19 include Respondent Homelink Mortgage's name, license number, and address. Respondents provided
20 at least two borrowers with residential mortgage loan applications that misidentified the loan product.

21 **1.14 Failed to provide accurate Equal Credit Opportunity Act (ECOA) information on**
22 **disclosures.** Respondents failed to provide accurate ECOA information on disclosures provided to at
23 least five borrowers – at least four notices failed to state which federal agency administers
24 compliance with the ECOA and at least one stated an incorrect agency.

1 **1.15 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, a loan
6 originator, or other licensed mortgage broker while employed or engaged by the licensed mortgage
7 broker.

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

18 **2.3 Requirement to comply with Consent Order.** Based on the Factual Allegations set forth in
19 Section I above, Respondents are in apparent violation of RCW 19.146.0201(2) and RCW
20 19.146.220, for failing to comply with an order of the director.

21 **2.4 Requirement to display required information in advertisements.** Based on the Factual
22 Allegations set forth in Section I above, Respondents are in apparent violation of RCW
23 19.146.0201(2) and WAC 208-660-446(1), (2), (4), and (5), for failing to display required
24 information in advertisements.

1 **2.5 Prohibition on advertising using disallowed and misleading phrases.** Based on the Factual
2 Allegations set forth in Section I above, Respondents are in apparent violation of RCW
3 19.146.0201(2) and WAC 208-660-440(3) and (7), for advertising using disallowed and misleading
4 phrases.

5 **2.6 Prohibition on engaging in misleading and deceptive practices.** Based on the Factual
6 Allegations set forth in Section I above, Respondents are in apparent violation of RCW
7 19.146.0201(1), (2), and (7), for directly or indirectly employing any scheme, device, or artifice to
8 defraud or mislead any person, by directly or indirectly engaging in any unfair or deceptive practice
9 toward any person, and by making, in any manner, any false or deceptive statement or representation
10 with regard to the rates, points, or other financing terms or conditions for a residential mortgage loan.

11 **2.7 Requirement to adhere to tolerance limits and provide timely disclosure of fees.** Based on
12 the Factual Allegations set forth in Section I above, Respondents are in apparent violation of RCW
13 19.146.0201(2) and (11), by failing to adhere to tolerance limits and provide timely disclosure of fees
14 as required by applicable federal law, including 12 CFR § 1026.19(e).

15 **2.8 Requirement to provide a complete and accurate loan estimate.** Based on the Factual
16 Allegations set forth in Section I above, Respondents are in apparent violation of RCW
17 19.146.0201(2) and (11), by failing to provide complete and accurate loan estimates as required by
18 applicable federal law, including 12 CFR § 1026.19(e)(1) and 12 CFR § 1026.37(a)(3) and (9),
19 (k)(1), and (m)(4).

20 **2.9 Requirement to provide a complete variable rate program disclosure.** Based on the
21 Factual Allegations set forth in Section I above, Respondents are in apparent violation of RCW
22 19.146.0201(2) and (11), by failing to provide a complete variable rate program disclosure as
23 required by applicable federal law, including 12 CFR § 1026.19(b)(2).

1 **2.10 Requirement to provide or to timely provide home equity line of credit disclosure.** Based
2 on the Factual Allegations set forth in Section I above, Respondents are in apparent violation of RCW
3 19.146.0201(2) and (11), by failing to provide or to timely provide home equity line of credit
4 disclosure as required by applicable federal law, including 12 CFR § 1026.40(a)(3)(b).

5 **2.11 Requirement to develop a compliant mortgage loan originator compensation agreement.**
6 Based on the Factual Allegations set forth in Section I above, Respondents are in apparent violation
7 of RCW 19.146.0201(2) and (11), by failing to develop a compliant mortgage loan originator
8 compensation agreement as required by applicable federal law, including 12 CFR § 1026.36(d)(1)(i).

9 **2.12 Requirement to develop a compliant anti-money laundering program.** Based on the
10 Factual Allegations set forth in Section I above, Respondents are in apparent violation of RCW
11 19.146.0201(2) and (11), by failing to develop a compliant anti-money laundering program as
12 required by applicable federal law, including 31 CFR § 1029.210 and 31 CFR § 1029.320.

13 **2.13 Requirement to include required information on residential mortgage loan application.**
14 Based on the Factual Allegations set forth in Section I above, Respondents are in apparent violation
15 of RCW 19.146.0201(2) and (11), by failing to include required information on residential mortgage
16 loan application as required by applicable state and federal law, including WAC 208-660-300(3) and
17 12 CFR § 1026.36(g).

18 **2.14 Requirement to provide accurate Equal Credit Opportunity Act information on**
19 **disclosures.** Based on the Factual Allegations set forth in Section I above, Respondents are in
20 apparent violation of RCW 19.146.0201(2) and (11), by failing to provide accurate Equal Credit
21 Opportunity Act information on disclosures as required by applicable federal law, including 12 CFR
22 § 1002.9(b)(1).

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1 **III. AUTHORITY TO IMPOSE SANCTIONS**

2 **3.1 Authority to Issue an Order to Cease and Desist or Affirmative Action.** Pursuant to RCW
3 19.146.220(3), the Director may issue orders directing a licensee, its employee, loan originator,
4 independent contractor, agent, or other person subject to the Act to cease and desist from conducting
5 business or take such other affirmative action as is necessary to comply with the Act.

6 **3.2 Authority to Revoke License.** Pursuant to RCW 19.146.220(2), the Director may revoke
7 licenses for: violations of orders; failure to comply with any directive, order, or subpoena of the
8 Director; or any violation of the Act.

9 **3.3 Authority to Prohibit from Industry.** Pursuant to RCW 19.146.220(4), the Director may
10 issue orders removing from office or prohibiting from participation in the conduct of the affairs of a
11 licensed mortgage broker, or both, any officer, principal, employee, or loan originator of any licensed
12 mortgage broker or any person subject to licensing under the Act for any violation of the Act or
13 failure to comply with any directive or order of the Director.

14 **3.4 Authority to Impose Fine.** Pursuant to RCW 19.146.220(2), the Director may impose fines
15 against a licensee, employees, independent contractors, agents of licensees, or other persons subject
16 to the Act for: violations of orders; failure to comply with any directive, order, or subpoena of the
17 Director; or any violation of the Act.

18 **3.5 Authority to Collect Investigation Fee.** Pursuant to RCW 19.146.228(2), WAC 208-660-
19 520(9) and (11), and WAC 208-660-550(4)(a), the Department will charge forty-eight dollars per
20 hour for an examiner’s time devoted to an investigation.

21 **3.6 Authority to Recover Costs and Expenses.** Pursuant to RCW 19.146.221(2), the Director
22 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,
3 as set forth in the above Factual Allegations, Grounds for Entry of Order, and Authority to Impose
4 Sanctions, constitute a basis for the entry of an Order under RCW 19.146.220, RCW 19.146.221, and
5 RCW 19.146.223. Therefore, it is the Director’s intent to ORDER that:

- 6 **4.1** Respondents Homelink Mortgage, Inc. and Amy Hsin Ju Wong cease and desist from
7 conducting business in a manner that fails to comply with the Act.
- 8 **4.2** Respondent Homelink Mortgage, Inc.’s license to conduct the business of a mortgage
9 broker be revoked.
- 10 **4.3** Respondent Amy Hsin Ju Wong be prohibited from participation in the conduct of the
11 affairs of any mortgage broker subject to licensure by the Director, in any manner, for
12 a period of five years.
- 13 **4.4** Respondents Homelink Mortgage, Inc. and Amy Hsin Ju Wong jointly and severally
14 pay a fine. As of the date of this Statement of Charges, the fine totals \$30,000.
- 15 **4.5** Respondents Homelink Mortgage, Inc. and Amy Hsin Ju Wong jointly and severally
16 pay an investigation fee. As of the date of this Statement of Charges, the investigation
17 fee totals \$575.
- 18 **4.6** Respondents Homelink Mortgage, Inc. and Amy Hsin Ju Wong maintain records in
19 compliance with the Act and provide the Department with the location of the books,
20 records and other information relating to Respondents’ mortgage broker business, and
21 the name, address and telephone number of the individual responsible for maintenance
22 of such records in compliance with the Act.
- 23 **4.7** Respondents Homelink Mortgage, Inc. and Amy Hsin Ju Wong jointly and severally
24 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.

V. AUTHORITY AND PROCEDURE

This Statement of Charges is entered pursuant to the provisions of RCW 19.146.220, RCW
19.146.221, RCW 19.146.223, and RCW 19.146.230, and is subject to the provisions of chapter
34.05 RCW (the Administrative Procedure Act). Respondents may make a written request for a

1 hearing as set forth in the NOTICE OF OPPORTUNITY TO DEFEND AND OPPORTUNITY FOR
2 HEARING accompanying this Statement of Charges.

3
4 Dated this 28th day of January, 2021.

5
6 /s/
7 LUCINDA FAZIO, Director
8 Division of Consumer Services
9 Department of Financial Institutions

10 Presented by:

11 /s/
12 DREW STILLMAN
13 Financial Legal Examiner

14 Approved by:

15 /s/
16 STEVEN C. SHERMAN
17 Enforcement Chief