

ORDER SUMMARY
Consumer Services Division Case Number C-21-3256

Consent Orders resolve investigations. In these, companies and individuals work with us to agree to terms that resolve the alleged issues in the investigation.

Names	eLink Mortgage LLC Ge Zhou
Order Number	C-21-3256-23-CO01
Date issued	September 18, 2023

What does this Consent Order require?

- **All terms of this order are complete.**
- Must pay a fine of \$25,000.
- Must pay an investigation fee of \$600. (Investigation fees cover the cost of DFI staff time working on the investigation.)
- Must cease and desist from all violations listed in the Statement of Charges.
- The Department may conduct an examination at any time without notice.

Need more information?

You can contact the Consumer Services Division, Enforcement unit at (360) 902-9703 or cseforcecomplaints@dfi.wa.gov. *Please remember that we cannot provide financial or legal advice to members of the public. We also cannot release confidential information.*

1
2
3
4
5
6
7
8

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

9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24

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

No.: C-21-3256-23-CO01

CONSENT ORDER

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

Respondents.

COMES NOW the Director of the Department of Financial Institutions (Director), through his
designee Lucinda Fazio, Division of Consumer Services Director, and eLink Mortgage, LLC
(Respondent eLink) and Ge Zhou (Respondent Zhou), 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-21-3256-22-SC01 (Statement of Charges), entered December 16, 2022 (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.

Based upon the foregoing:

CONSENT ORDER
C-21-3256-23-CO01
eLink Mortgage LLC, et al.

1

DEPARTMENT OF FINANCIAL INSTITUTIONS
Division of Consumer Services
150 Israel Rd SW
PO Box 41200
Olympia, WA 98504-1200
(360) 902-8703

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

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

8 **C. Cease and Desist.** It is AGREED and ORDERED that Respondents shall cease and desist
9 from the violations cited in the Statement of Charges and shall take affirmative action necessary to
10 conduct business in a manner that complies with the Act.

11 **D. Fine.** It is AGREED and ORDERED that Respondents shall pay a fine to the Department
12 in the amount of \$25,000.

13 **E. Investigation Fee.** It is AGREED and ORDERED that Respondents shall pay to the
14 Department an investigation fee of \$600.

15 **F. Payment.** It is AGREED that the investigation fee and fine shall be paid together in one
16 \$25,600 cashier's check, made payable to the "Washington State Treasurer," upon delivery of this
17 Consent Order to the Department, properly dated and signed.

18 **G. Examination.** It is AGREED that, after the entry of this Consent Order, the Department
19 may conduct an examination without prior notice to Respondents and that Respondents will provide
20 open access to all of Respondents' books and records at that time. It is further AGREED that the
21 examination will be at Respondents' expense.

22 **H. Change of Address.** It is AGREED that for the duration of the period this Consent Order
23 is in effect, unless otherwise agreed to in writing by the Department, Respondents shall provide the

1 Department with a mailing address and telephone number at which Respondents can be contacted and
2 Respondents shall notify the Department in writing of any changes to their mailing address or
3 telephone number within fifteen days of any such change.

4 **I. Records Retention.** It is AGREED and ORDERED that Respondent eLink, its officers,
5 employees, and agents shall maintain records in compliance with the Act and provide the Director
6 with the location of the books, records and other information relating to Respondents' mortgage
7 broker business, and the name, address and telephone number of the individual responsible for
8 maintenance of such records in compliance with the Act.

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

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

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

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

20 **N. Counterparts.** It is AGREED that this Consent Order may be executed in one or more
21 separate counterparts, each of which when so executed shall be deemed an original. Such
22 counterparts shall together constitute a single document. An electronic signature, or a faxed,
23

1 photocopied, or scanned copy of an original signature, shall be deemed the same as an original
2 signature.

3 **RESPONDENTS:**

4 eLink Mortgage, LLC, by:

5 [Redacted Signature]

9/1/2023

6 Ge Zhou
President, Owner, and Designated Broker

Date

7 [Redacted Signature]

9/1/2023

8 Ge Zhou, Individually
Individually

Date

9 Approved for Entry:

10 [Redacted Signature]

Sept. 1, 2023

11 Charles R. Horner, WSBA No. 27504
12 Law Offices of Charles R. Horner PLLC
Attorney for Respondents

Date

13 DO NOT WRITE BELOW THIS LINE

14 THIS ORDER ENTERED THIS 18th DAY OF September, 2023.



18 [Redacted Signature]
LUCINDA FAZIO, Director
Division of Consumer Services
Department of Financial Institutions

19 Presented by:

20 [Redacted Signature]

DREW STILLMAN
Financial Legal Examiner Supervisor

21 Approved by:

22 [Redacted Signature]

23 JACK McCLELLAN
Enforcement Chief

24 CONSENT ORDER
C-21-3256-23-CO01
eLink Mortgage LLC, et al.

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

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

10 **1.3 Prior Statement of Charges and Consent Order.** In 2019, the Department issued a
11 Statement of Charges (2019 Charges), which alleged violations of the Act identified during the 2018
12 Examination. In 2020, the issues raised in the 2019 Charges were resolved in a Consent Order (2020
13 Consent Order) in which Respondents agreed to cease and desist from the violations identified in the
14 2019 Charges; to pay a fine and investigation fee; to obtain, maintain, and use unobjectionable
15 compliance software; and to pay for the Department’s next examination, which would review
16 Respondents’ compliance with the 2020 Consent Order.

17 **1.4 2021 Examination.** Between approximately October 18, 2021, and October 21, 2021, the
18 Department conducted an off-site compliance examination of Respondent eLink (2021 Examination).
19 At the 2021 Examination, the Department reviewed loan files originated between June 1, 2020, and
20 September 20, 2021 (the “relevant period”), as well as Respondents’ business and advertising
21 practices. As a result of the Examination, the Department identified the violations described in
22 Paragraphs 1.5 through 1.19 below.

23 **1.5 Noncompliance with 2020 Consent Order.** During the relevant period, Respondents failed
24 to fully comply with the 2020 Consent Order. For example, Respondents did not cease and desist

1 from all violations identified in the 2019 Charges and did not obtain, maintain, and use
2 unobjectionable compliance software.

3 **1.6 Advertised without Displaying Required Information.** During the relevant period and on
4 at least three web pages advertising Respondent eLink, Respondent eLink and mortgage loan
5 originators employed by Respondent eLink did not provide one or more of the following: Respondent
6 eLink's license number, mortgage loan originators' license numbers, links to the NMLS consumer
7 access web page for Respondent eLink, or Respondent eLink's licensed name.

8 **1.7 False Disclosures.** During the relevant period and in at least six instances, Respondent eLink
9 and its mortgage loan originators provided borrowers with a disclosure, which falsely advised
10 borrowers of a penalty if they pay off their loan within the first six months.

11 **1.8 Failed to Identify the Mortgage Loan Originator on Documents.** During the relevant
12 period and in at least four instances, Respondent eLink failed to disclose the name and license
13 number of the mortgage loan originator with primary responsibility for the loan origination on one or
14 more of the following: credit applications, disclosures, notes, loan contracts, and securities
15 instruments.

16 **1.9 Failed to Provide Rate Lock Agreements.** During the relevant period and in at least five
17 instances, Respondent eLink failed to provide a rate lock agreement after locking, relocking, or
18 extending a borrower's interest rate lock period.

19 **1.10 Failed to Provide Complete and Accurate Rate Lock Agreements.** During the relevant
20 period and in at least eight instances, Respondent eLink failed to provide complete and accurate rate
21 lock agreements. For example, in rate lock agreements, Respondent eLink incorrectly disclosed or
22 failed to disclose one or more of the following: the name of the company guaranteeing the rate lock,
23 the date of the rate lock, the number of days in the rate lock period, the expiration date of the rate
24 lock, the existence of a rate lock guarantee, and the amount of the rate lock fee.

1 **1.11 Provided Affiliated Business Arrangement Disclosure with Blanks.** During the relevant
2 period and in at least three instances, Respondent eLink provided borrowers with an Affiliated
3 Business Arrangement Disclosure that contained blanks.

4 **1.12 Failed to Adhere to Tolerance Limits.** During the relevant period and in at least one
5 instance, Respondent eLink charged a borrower more than the original disclosed appraisal cost
6 without a valid change in circumstance.

7 **1.13 Incomplete Loan Estimates.** During the relevant period and in at least two instances,
8 Respondent eLink provided incomplete Loan Estimates to borrowers. For example, Respondent
9 eLink provided borrower with Loan Estimates that omitted the following: the date, time, and time
10 zone for closing cost expiration; the mortgage loan originator's name, license number, email address,
11 and phone number; a checked box in the "Assumption" section; a checked box in the "Servicing"
12 section; and required information in the "Late Payment" section.

13 **1.14 Failed to Provide Privacy Policies.** During the relevant period and in at least three
14 instances, Respondent eLink failed to provide to borrowers a clear and conspicuous notice that
15 accurately reflects its privacy policies and practices.

16 **1.15 Failed to Provide Accurate Anti-Steering Disclosures.** During the relevant period and in at
17 least two instances, Respondent eLink provided borrowers with disclosures regarding purportedly
18 different loan options, when it appears that at least two of the loan options were the same and the
19 disclosures provided incomplete or contradictory information.

20 **1.16 Prohibited Payments to Mortgage Loan Originators.** During the relevant period,
21 Respondent eLink paid its mortgage loan originators, directly or indirectly, compensation in an
22 amount that was based on a term of a transaction, the terms of multiple transactions by an individual
23 mortgage loan originator, the terms of multiple transactions by multiple individual mortgage loan
24 originators, or a proxy for a term of a transaction.

1 **1.17 Failed to Implement an Anti-Money Laundering Program.** During the relevant period,
2 Respondents failed to implement an anti-money laundering program. Alternatively, Respondents
3 failed to keep and use in the business such books, accounts, records, papers, documents, files, and
4 other information as will enable the Director to determine whether Respondents complied with their
5 obligation to implement an Anti-Money Laundering Program.

6 **1.18 Failed to Implement a Red Flags Program.** During the relevant period, Respondents failed
7 to implement a program designed to detect, prevent, and mitigate identity theft (“Red Flags
8 Program”) as required by the Fair Credit Reporting Act. Alternatively, Respondents failed to keep
9 and use in the business such books, accounts, records, papers, documents, files, and other information
10 as will enable the director to determine whether Respondents complied with their obligation to
11 implement a Red Flags Program.

12 **1.19 Failed to Provide Complete and Accurate Disclosures and Provided Unnecessary**
13 **Disclosures.** During the relevant period and in at least 17 instances, Respondent eLink failed to
14 provide complete and accurate disclosures to borrowers, including trust account disclosures, privacy
15 policy disclosures, and homeownership counseling lists. Additionally, during the relevant period and
16 in at least six instances, Respondents provided unnecessary, inapplicable, or outdated disclosures to
17 borrowers.

18 **1.20 On-Going Investigation.** The Department’s investigation into the alleged violations of the
19 Act by Respondents continues to date.

20 II. GROUNDS FOR ENTRY OF ORDER

21 **2.1 Responsibility for Conduct of Loan Originators.** Pursuant to RCW 19.146.245, a licensed
22 mortgage broker is liable for any conduct violating the Act by the designated broker or a loan
23 originator while employed or engaged by the licensed mortgage broker.

1 **2.2 Responsibility of Designated Broker.** Pursuant to RCW 19.146.200(3), every licensed
2 mortgage broker must at all times have a designated broker responsible for all activities of the
3 mortgage broker in conducting the business of a mortgage broker. A designated broker who has
4 supervisory authority over a mortgage broker is responsible for a licensee's, employee's, or
5 independent contractor's violations of the Act if: (a) the designated broker instructs the conduct or,
6 with knowledge of the specific conduct, approves or allows the conduct; or (b) the designated broker,
7 who has supervisory authority over the licensed mortgage broker, knows or by the exercise of
8 reasonable care and inquiry, should have known of the conduct, at a time when its consequences can
9 be avoided or mitigated and fails to take reasonable remedial action.

10 **2.3 Noncompliance with Consent Order.** Based on the Factual Allegations set forth in Section
11 I above, Respondents are in apparent violation of RCW 19.146.0201(2), RCW 19.146.0201(11),
12 RCW 19.146.220, and the terms of the 2020 Consent Order, for failing to comply with all terms of
13 the 2020 Consent Order.

14 **2.4 Advertised without Displaying Required Information.** Based on the Factual Allegations
15 set forth in Section I above, Respondents are in apparent violation of RCW 19.146.0201(2), RCW
16 19.146.0201(11), and WAC 208-660-446 for advertising without displaying the company's license
17 number, the company's licensed name, MLOs' license numbers, and links to the NMLS consumer
18 access web page for the company.

19 **2.5 False Disclosures.** Based on the Factual Allegations set forth in Section I above, Respondents
20 are in apparent violation of RCW 19.146.0201(2), RCW 19.146.0201(7), and RCW 19.146.0201(11)
21 for providing borrowers with a disclosure that falsely advised borrowers of a penalty if they paid off
22 their loan within the first six months.

23 **2.6 Failure to Identify the Mortgage Loan Originator on Documents.** Based on the Factual
24 Allegations set forth in Section I above, Respondents are in apparent violation of RCW

1 19.146.0201(2), RCW 19.146.0201(11), WAC 208-660-350(24), and 12 C.F.R. § 1026.36(g) for
2 failing to disclose the name and license number of the mortgage loan originator with primary
3 responsibility for the loan origination on one or more of the following: credit applications,
4 disclosures, notes, loan contracts, and securities instruments.

5 **2.7 Failure to Provide Rate Lock Agreements.** Based on the Factual Allegations set forth in
6 Section I above, Respondents are in apparent violation of RCW 19.146.0201(2), RCW
7 19.146.0201(6), RCW 19.146.0201(11), RCW 19.146.030(2)(c) and WAC 208-660-430(1), (3)(c),
8 (3)(e), and (6), for failing to provide rate lock agreements after locking, relocking, or extending a
9 borrower's interest rate lock period.

10 **2.8 Failure to Provide Complete and Accurate Rate Lock Agreements.** Based on the Factual
11 Allegations set forth in Section I above, Respondents are in apparent violation of RCW
12 19.146.0201(2), RCW 19.146.0201(11), and WAC 208-660-430(3)(c) for incorrectly disclosing or
13 failing to disclose one or more of the following: the name of the company guaranteeing the rate lock,
14 the date of the rate lock, the number of days in the rate lock period, the expiration date of the rate
15 lock, the existence of a rate lock guarantee, and the amount of the rate lock fee.

16 **2.9 Incomplete Affiliated Business Arrangement Disclosure.** Based on the Factual Allegations
17 set forth in Section I above, Respondents are in apparent violation of RCW 19.146.0201(2), RCW
18 19.146.0201(11), WAC 208-660-500(3)(h), and 12 C.F.R. § 1024.15(b)(1), (2) for providing
19 borrowers with an Affiliated Business Arrangement Disclosure that contained blanks

20 **2.10 Failure to Adhere to Tolerance Limits.** Based on the Factual Allegations set forth in
21 Section I above, Respondents are in apparent violation of RCW 19.146.0201(2), RCW
22 19.146.0201(11), and 12 C.F.R. § 1026.19(e) for charging a borrower more than the original
23 disclosed appraisal cost without a valid change in circumstance.

1 **2.11 Incomplete Loan Estimates.** Based on the Factual Allegations set forth in Section I above,
2 Respondents are in apparent violation of RCW 19.146.0201(2) and RCW 19.146.0201(11) for
3 providing Loan Estimates to borrowers that did not include information required by 12 C.F.R. §§
4 1026.19(e)(1), (3)(iv)(E), and 12 C.F.R. §§ 1026.37(a)(13)(ii), (k), and (m)(2), (4), and (6).

5 **2.12 Failure to Provide Privacy Policies.** Based on the Factual Allegations set forth in Section I
6 above, Respondents are in apparent violation of RCW 19.146.0201(2), RCW 19.146.0201(11), and
7 12 C.F.R. §§ 1016.4(a), (c)(1), and (2) for failing to provide to borrowers a clear and conspicuous
8 notice that accurately reflects its privacy policies and practices.

9 **2.13 Failure to Provide Accurate Anti-Steering Disclosures.** Based on the Factual Allegations
10 set forth in Section I above, Respondents are in apparent violation of RCW 19.146.0201(2), RCW
11 19.146.0201(7), and RCW 19.146.0201(11) for providing borrowers with disclosures regarding
12 purportedly different loan options, when it appears that at least two of the loan options were the same
13 and the disclosures provided incomplete or contradictory information.

14 **2.14 Prohibited Payments to Mortgage Loan Originators.** Based on the Factual Allegations set
15 forth in Section I above, Respondents are in apparent violation of RCW 19.146.0201(2), RCW
16 19.146.0201(11), and 12 C.F.R. § 1026.36(d)(1)(i) for paying its mortgage loan originators, directly
17 or indirectly, compensation in an amount that was based on a term of a transaction, the terms of
18 multiple transactions by an individual mortgage loan originator, the terms of multiple transactions by
19 multiple individual mortgage loan originators, or a proxy for a term of a transaction.

20 **2.15 Failure to Implement an Anti-Money Laundering Program.** Based on the Factual
21 Allegations set forth in Section I above, Respondents are in apparent violation of RCW
22 19.146.0201(2), RCW 19.146.0201(11), and 12 C.F.R. § 1029.210 for failing to implement an anti-
23 money laundering program. Alternatively, based on the Factual Allegations set forth in Section I
24 above, Respondents are in apparent violation of RCW 19.146.0201(2), RCW 19.146.0201(11), RCW

1 19.146.060(2) and WAC 208-660-450(1)(a), for failing to keep and use in the business such books,
2 accounts, records, papers, documents, files, and other information as will enable the Director to
3 determine whether Respondents complied with their obligation to implement an Anti-Money
4 Laundering Program.

5 **2.16 Failure to Implement a Red Flags Program.** Based on the Factual Allegations set forth in
6 Section I above, Respondents are in apparent violation of RCW 19.146.0201(2), RCW
7 19.146.0201(11), and 12 C.F.R. § 681.1(e) and (f) for failing to implement a program designed to
8 detect, prevent, and mitigate identity theft (“Red Flags Program”) as required by the Fair Credit
9 Reporting Act. Alternatively, based on the Factual Allegations set forth in Section I above,
10 Respondents are in apparent violation of RCW 19.146.0201(2), RCW 19.146.0201(11), RCW
11 19.146.060(2) and WAC 208-660-450(1)(a), for failing to keep and use in the business such books,
12 accounts, records, papers, documents, files, and other information as will enable the Director to
13 determine whether Respondents complied with their obligation to implement a Red Flags Program.

14 **2.17 Failure to Provide Complete and Accurate Disclosures and Provided Unnecessary**
15 **Disclosures.** Based on the Factual Allegations set forth in Section I above, Respondents are in
16 apparent violation of RCW 19.146.0201(2) and RCW 19.146.0201(11) for failing to provide
17 complete and accurate disclosures to borrowers, including trust account disclosures, privacy policy
18 disclosures, and homeownership counseling lists, and for providing unnecessary, inapplicable, or
19 outdated disclosures to borrowers.

20 III. AUTHORITY TO IMPOSE SANCTIONS

21 **3.1 Authority to Issue an Order to Cease and Desist or Take Affirmative Action.** Pursuant to
22 RCW 19.146.220(3), the Director may issue orders directing a licensee, its employee, loan originator,
23 independent contractor, agent, or other person subject to the Act to cease and desist from conducting
24 business or take such other affirmative action as is necessary to comply with this chapter.

1 **3.2 Authority to Revoke License.** Pursuant to RCW 19.146.220(2), the Director may suspend
2 licenses for any violation of the Act.

3 **3.3 Authority to Impose Fine.** Pursuant to RCW 19.146.220(2), the Director may impose fines
4 against a licensee for any violation of the Act.

5 **3.4 Authority to Collect Investigation Fee.** Pursuant to RCW 19.146.228(2), WAC 208-660-
6 520(9) and (11), and WAC 208-660-550(4)(a), the Department will charge forty-eight dollars per
7 hour for an examiner's time devoted to an investigation.

8 **3.5 Authority to Recover Costs and Expenses.** Pursuant to RCW 19.146.221(2), the Director
9 may recover the state's costs and expenses for prosecuting violations of the Act.

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

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

15 **4.1** Respondents eLink Mortgage LLC and Ge Zhou cease and desist from the violations
16 cited in Section II above and take affirmative action necessary to conduct business in a
manner that complies with the Act.

17 **4.2** Respondent eLink Mortgage LLC's license to conduct business as a mortgage broker
18 be revoked.

19 **4.3** Respondent Ge Zhou's license to conduct the business of a loan originator be revoked.

20 **4.4** Respondents eLink Mortgage LLC and Ge Zhou be prohibited from participation in
21 the conduct of the affairs of any mortgage broker subject to licensure by the Director,
in any manner, for a period of 5 years.

22 **4.5** Respondents eLink Mortgage LLC and Ge Zhou jointly and severally pay a fine. As of
the date of this Statement of Charges, the fine totals \$75,000.

23 **4.6** Respondents eLink Mortgage LLC and Ge Zhou jointly and severally pay an
24 investigation fee. As of the date of this Statement of Charges, the investigation fee
totals \$600.

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24

4.7 Respondents eLink Mortgage LLC and Ge Zhou maintain records in compliance with 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 and telephone number of the individual responsible for maintenance of such records in compliance with the Act.

4.8 Respondents eLink Mortgage LLC and Ge Zhou 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.

//
//
//
//
//
//
//
//
//
//
//
//
//
//
//
//
//
//
//
//

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

7
8 Dated this 16th day of December, 2022.



13
14

████████████████████

LUCINDA FAZIO, Director
Division of Consumer Services
Department of Financial Institutions

15 Presented by:

16
17

████████████████████

18
19

DREW STILLMAN
Financial Legal Examiner

20 Approved by:

21
22

████████████████████

23
24

JACK McCLELLAN
Enforcement Chief