

Terms Complete
ORDER SUMMARY – Case Number: C-20-2953

Respondents/NMLS Nos.	Casa Financial Services, Inc., NMLS 120281
	Brett A. Mills, NMLS No. 120484
	Zindi M. Mills, NMLS No. 120488
Order Number:	C-20-2953-21-CO01
Effective Date:	July 15, 2021
License Effects (Stayed):	Respondent Casa’s Mortgage Broker license is revoked, with the revocation stayed for two years subject to conditions.
	Respondent Brett Mills’ MLO license is revoked, with the revocations stayed for two years subject to conditions.
Prohibitions (Stayed):	All three Respondents are prohibited from the mortgage broker industry for two years, with the prohibitions stayed subject to conditions.

Fine: \$25,000, ½ paid up front and ½ stayed	\$ 12,500	Due: Upon entry.	Paid: <input checked="" type="checkbox"/> Y	Date: 7/12/2021
Stayed Fine:	\$ 12,500	Stayed for two years subject to conditions.		
Investigation Fees:	\$ 1,000	Due: Upon entry.	Paid: <input checked="" type="checkbox"/> Y	Date: 7/12/2021

Comments: Within two years of the entry of this Order, the Department will conduct a compliance examination of Respondent Casa’s business practices, policies, and procedures, including compliance with the Act and this Order, at Respondents’ cost and the Department’s convenience.

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
5 Mortgage Broker Practices Act of Washington by:

No. C-20-2953-21-CO01

6 CONSENT ORDER

7 CASA FINANCIAL SERVICES, INC., d/b/a cfsloans.biz,
NMLS No. 120281;
8 BRETT ASHLEY MILLS, Co-Owner, CEO,
Designated Broker, and MLO, NMLS No. 120484; and
9 ZINDI MARIE MILLS, Co-Owner, CFO, Secretary, and
MLO, NMLS No. 120488,

Respondents.

10 COMES NOW the Director of the Department of Financial Institutions (Director), through his designee
11 Lucinda Fazio, Division of Consumer Services Director, and Casa Financial Services Inc. (Respondent Casa), Brett
12 Ashley Mills, co-owner and CEO of Respondent Casa (Respondent Brett Mills), and Zindi Marie Mills, co-owner
13 and CFO of Respondent Casa (Respondent Zindi Mills), and finding that the issues raised in the above-captioned
14 matter may be economically and efficiently settled, agree to the entry of this Consent Order (Order). The
15 Department enters this Order pursuant to the Mortgage Broker Practices Act (Act), RCW 19.146, and RCW
16 34.05.060 of the Administrative Procedure Act (APA), based on the following:

17 **AGREEMENT AND ORDER**

18 The Department of Financial Institutions, Division of Consumer Services (Department) and Respondents
19 Casa, Brett Mills, and Zindi Mills (hereinafter Respondents) have agreed upon a basis for resolution of the matters
20 alleged in the attached Statement of Charges (Charges), No. C-20-2953-21-SC01, entered May 12, 2021. Pursuant
21 to the Act and APA, Respondents hereby agree to the Department's entry of this Order. The parties intend this
22 Order to fully resolve the Charges, and agree that the Respondents do not admit any wrongdoing by its entry.
23 Respondents are agreeing not to contest the Charges in consideration of the terms of this Consent Order.

24 Based on the foregoing:

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

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

5 **C. Cease and Desist and Future Compliance.** It is AGREED that Respondents have represented and
6 warranted to the Department that Respondent Casa has ceased and desisted the violations of the Act noted in the
7 2020 Report of Examination and the Charges. It is FURTHER AGREED and ORDERED that Respondents shall
8 henceforth comply with the Act, both as now existing and as hereafter amended.

9 **D. License Revocations (Stayed).** It is AGREED and ORDERED that upon the entry of this Order,
10 Respondent Casa’s mortgage broker license, and Respondent Brett Mills’ mortgage loan originator license, are
11 revoked. It is FURTHER AGREED that contingent upon compliance with the Act and this Order, the Department
12 stays those revocations for two (2) years from the date of this Order.

13 **E. Prohibitions from Industry (Stayed).** It is AGREED and ORDERED that upon the entry of this Order,
14 Respondents are prohibited from participating, in any capacity, in the conduct of the affairs of any mortgage broker
15 licensed by the Department or subject to licensure or regulation by the Department. It is FURTHER AGREED and
16 ORDERED that contingent upon compliance with the Act and this Order, the Department stays those prohibitions
17 for two (2) years from the date of this Order.

18 **F. Fine (Partially Stayed).** It is AGREED and ORDERED that in consideration of the terms of this Order,
19 Respondents shall pay to the Department a \$25,000 fine, with \$12,500 paid pursuant to Paragraph G. It is
20 FURTHER AGREED and ORDERED that contingent upon compliance with the Act and this Order, the
21 Department stays payment of the \$12,500 balance for two (2) years from the date of this Order.

22 **G. Investigation Fee.** It is AGREED and ORDERED that Respondents shall pay to the Department an
23 investigation fee of \$1,000. The paid Fine and Investigation Fee shall be paid together in one \$13,500 cashier’s
24 check made payable to the “Washington State Treasurer,” and paid upon delivery of this dated and signed Order to
25 the Department.

1 **H. Compliance Examination.** It is AGREED and ORDERED that subject to the Department’s availability,
2 within two (2) years of the entry of this Order, at Respondents’ cost, the Department will conduct a compliance
3 examination of Respondent Casa’s business practices, policies, and procedures, including compliance with the Act
4 and this Order. At the conclusion of the compliance examination, the Department will generate a Report of
5 Examination (ROE) Risk Rating. A Risk Rating of one (1) or two (2) will result in the Stayed Revocations, Stayed
6 Prohibitions, and Stayed Fine (the Stayed Sanctions) expiring without further notice or action by the Department,
7 and will not be imposed. A Risk Rating of three (3) *may* result in the Department lifting some or all of the stays
8 and imposing the some or all of the Stayed Sanctions pursuant to Paragraph I. A Risk Rating of four (4) or five (5)
9 *will* result in the Department lifting some or all of the stays and imposing the some or all of the Stayed Sanctions
10 pursuant to Paragraph I, and may result in the imposition of other sanctions necessary for the enforcement of the
11 Act and protection of the public. It is FURTHER AGREED and ORDERED that regardless of the assigned Risk
12 Rating, Respondents must respond to and address all findings in the ROE, and timely pay the invoice for the
13 compliance examination conducted by the Department pursuant to this Order. Failure to timely pay any
14 examination invoice is a breach of this Order.

15 **I. Lifting of Stays and Imposition of Stayed Sanctions.** It is AGREED and ORDERED that:

- 16 1. If during the two (2) year stay, the Department determines that Respondents have not complied
17 with the Act or this Order, and seeks to lift the stays and impose any or all of the Stayed Sanctions,
18 the Department will first serve Respondents with a written notice of alleged noncompliance.
- 19 2. The notice will include:
 - 20 a. A description of the alleged noncompliance;
 - 21 b. A statement that the Department seeks to lift the stays and impose any or all of the Stayed
22 Sanctions;
 - 23 c. Notice that any Respondent can contest the Department’s determination of noncompliance
24 either in an adjudicative hearing before an Administrative Law Judge (AALJ) of the Office of
25 Administrative Hearings (OAH), or by submitting a written response to the Department
26 contesting the alleged noncompliance; and
 - 27 d. Notice that the adjudicative hearing process provided in this Paragraph applies only to this
28 Order solely in the event any Respondent chooses to contest the Department’s determination
29 of noncompliance before an ALJ at OAH.
- 30 3. Any Respondent who wishes to contest the Department’s determination of noncompliance will
31 have twenty (20) days from the date of service of the notice of noncompliance to submit an
32 Application for an Adjudicative Hearing to the Department.

- 1 **4.** The scope and issues of the Adjudicative Hearing are limited solely to whether or not Respondents
2 are in violation of the terms of the Act or this Order.
- 3 **5.** At the conclusion of the Adjudicative Hearing, the ALJ will issue an initial decision. Any party to
4 the Adjudicative Hearing may file a Petition for Review of that initial decision with the Director of
5 the Department.
- 6 **6. DEFAULT:** If any Respondent does not timely request an Adjudicative Hearing, or timely submit
7 a written response contesting the alleged noncompliance, the Department will impose the Stayed
8 Sanctions and pursue whatever other enforcement action it deems necessary to enforce the Act and
9 Order.

10 **J. Authority to Execute Order.** It is AGREED that Respondent Brett Mills and Respondent Zindi Mills
11 have represented and warranted that they have the full power and right to execute this Order on behalf of
12 Respondent Casa.

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

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

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

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

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1 **CASA FINANCIAL SERVICES, INC.**

2 By: By:

3 /s/ 6/30/21 /s/ 6/30/21
4 BRETT ASHLEY MILLS DATE ZINDI MARIE MILLS DATE
5 Co-Owner and CEO, Casa Financial Services, Inc. Co-Owner and CFO, Casa Financial Services, Inc.

6 **BRETT ASHLEY MILLS** **ZINDI MARIE MILLS**
7 /s/ 6/30/21 /s/ 6/30/21
8 BRETT ASHLEY MILLS DATE ZINDI MARIE MILLS DATE
9 Individually Individually

9 APPROVED FOR ENTRY:

10
11 /s/ 6/30/21
12 JESSICA M. CREAGER, WSBA No. 42183 DATE
13 Seattle Litigation Group, PLLC
14 Attorney for Respondents

14 **DO NOT WRITE BELOW THIS LINE**

15 THIS ORDER ENTERED THIS 15th DAY OF JULY 2021.

16
17 /s/
18 LUCIND FAZIO, Director
19 Division of Consumer Services
20 Department of Financial Institutions

21 Presented by:

21 Approved by:

22
23 /s/ ANTHONY W. CARTER
24 Senior Legal Examiner
25 Consumer Services Enforcement Unit
26 Department of Financial Institutions

23 /s/ STEVEN C. SHERMAN
24 Enforcement Chief
25 Consumer Services Enforcement Unit
26 Department of Financial Institutions

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 CASA FINANCIAL SERVICES, INC., d/b/a cfsloans.biz,
NMLS No. 120281;
6 BRETT ASHLEY MILLS, Co-Owner, CEO,
Designated Broker, and MLO, NMLS No. 120484; and
7 ZINDI MARIE MILLS, Co-Owner, CFI, Secretary, and
MLO, NMLS No. 120488,

8 Respondents.

No. C-20-2953-21-SC01

STATEMENT OF CHARGES and NOTICE OF
INTENT TO ENTER AN ORDER TO REVOKE
LICENSES, PROHIBIT FROM INDUSTRY,
IMPOSE FINES, COLLECT INVESTIGATION
FEES, and RECOVER COSTS AND EXPENSES
OF PROSECUTION

9 **INTRODUCTION**

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

15 **I. FACTUAL ALLEGATIONS**

16 **1.1 Respondents.**

17 **A. Casa Financial Services, Inc. (Respondent Casa).** The Washington State Department of Financial
18 Institutions (Department) licensed Respondent Casa as a mortgage broker under the Act on or about October 19,
19 2007, and Respondent Casa remains licensed in Washington to date.

20 **B. Brett Ashley Mills (Respondent Brett Mills).** The Department licensed Respondent Brett Mills as a
21 Mortgage Loan Originator (MLO) on or about December 22, 2009, and registered him as the Designated Broker of
22 Respondent Casa under the Act on or about the same date. Respondent Brett Mills is the CEO and Co-Owner of
23 Respondent Casa. Respondent Brett Mills remains licensed as a MLO sponsored by Respondent Casa, and
24 registered as the Designated Broker for Respondent Casa in Washington to date.

1 **C. Zindi Marie Mills (Respondent Zindi Mills).** The Department has never licensed Respondent Zindi Mills
2 under the Act in any capacity. Respondent Zindi Mills is the CFO, Secretary, and Treasure of Respondent Casa and
3 is the other Co-Owner of Respondent Casa.

4 **1.2 2015 Examination.** During September 2015, the Department conducted an on-site compliance examination
5 of Respondent Casa to ascertain compliance with the Act, associated Rules at WAC 208-660, and applicable
6 federal laws and regulations. The Department reviewed two residential mortgage loan files and found nine
7 violations of the Act, Rules, and applicable federal laws and regulations, as well as two Internal Routine and
8 Control Exceptions. The 2015 Report of Examination (2015 ROE) gave Respondent Casa a risk rating of “3” on a
9 scale of 1-5, noting that:

10 The Company exhibits a combination of weaknesses ranging from moderately severe to less than
11 satisfactory. Prompt corrective action is needed to remedy the Company’s multiple violations of
12 the law and internal routine and control deficiencies. In addition, the Company may be adversely
13 impacted if concerted action is not effective in correcting the weaknesses. Consequently, the
14 Company requires more than normal supervision. Its overall operational controls and financial
15 capacity, however, are still such that its future viability should not be impaired.

16 **1.3 2020 Examination.** During the spring of 2020, the Department conducted an off-site examination of
17 Respondent Casa’s business practices occurring from July 1, 2017, through February 29, 2020 (the Relevant
18 Period). The Department reviewed five residential mortgage loan files and found nine violations of the Act, Rules,
19 and applicable federal laws and regulations, as well as three Internal Routine and Control Exceptions. The 2020
20 Report of Examination (2020 ROE) gave Respondent Casa a risk rating of “4” on a scale of 1-5, noting that:

21 The Company has an inordinate volume of operational control and/or combination of other
22 identified weaknesses that cause its overall condition to be considered unsatisfactory. Unless
23 prompt action is taken to correct these conditions, the problems could reasonably be expected to
24 impair the licensee’s future viability. Close supervisory attention and enhanced monitoring of the
25 Company’s operational controls is warranted. Companies accorded this rating are generally under
26 some type of regulatory action with the Department.

1.4 Violations. The following violations of the Act, Rules, and applicable federal laws and regulations occurred:

A. False Information. On at least two occasions during the Relevant Period, Respondent Casa, Respondent
Brett Mills, and Respondent Zindi Mills (hereinafter Respondents) provided false information to the
Department. On or about August 26, 2019, the Department asked that Respondents produce all documents
related to its five most recently closed mortgage loans originated for Washington borrowers. On or about
September 24, 2019, Respondents complied. Included with the documents were rate lock agreements
(RLAs) purportedly included as part of the initial disclosure package provided to two borrowers. The
RLAs were completed in hand writing, and had been hand signed purportedly by the borrowers. All the

1 other initial disclosure documents in those two borrowers' loan files had been computer generated by
2 Respondent Casa's loan origination software, and electronically signed by the borrowers.
3 Further investigation of borrower KH's RLA revealed that the document had been prepared on September
4 23, 2019, approximately two years after the loan closed, and one day prior to Respondents uploading the
5 RLA to the Department. Further investigation of borrower JN's RLA revealed that the document had been
6 prepared when the loan was being processed, rather than when the other initial disclosures were being
7 prepared, and included inaccurate loan information prepared three weeks after origination.

8 **B. Records Maintenance.** On at least five occasions during the Relevant Period, Respondents failed to
9 properly maintain residential mortgage loan records, including initial disclosures and e-mail
10 correspondence with Washington borrowers.

11 **C. Incomplete, Inaccurate, and Unnecessary Loan Disclosures.** On at least two occasions during the
12 Relevant Period, Respondents failed to make complete or accurate loan disclosures to borrowers as
13 required by the Act. The Loan Estimates provided to Washington borrowers KH and JN were both
14 missing the lender's name and address, the lender's NMLS number, and contained incorrect late payment
15 information. On at least four occasions during the Relevant Period, Respondents delivered unnecessary
16 disclosures to Washington borrowers, including outdated RESPA Servicing disclosures, outdated Intent to
17 Proceed disclosures, and California-specific disclosures not applicable for Washington borrowers.

18 **D. Unlicensed Loan Origination.** On at least two occasions during the Relevant Period, Respondent Zindi
19 Mills originated residential mortgage loans for Washington borrowers, secured by real property located in
20 Washington, while she was not licensed as a MLO in Washington.

21 **E. Mortgage Call Reports.** On at least two occasions during the Relevant Period, Respondents failed to file
22 with the Department timely quarterly Mortgage Call Reports (MCRs). The MCR for the 1st quarter of
23 2018, due May 15, 2018, was not filed with the Department until June 5, 2018, some 22 days late. The
24 MCR for the 4th quarter of 2019, due February 20, 2020, was not filed with the Department until February
25 20, 2027, some 8 days late. In addition, on at least two occasions during the Relevant Period, Respondents
26 failed to file with the Department complete Residential Mortgage Lending Activity (RMLA) reports, a
required component of the MCR. The RMLA for the 4th quarter of 2018, and the RMLA for the 1st quarter
of 2019, failed to report "Gross Revenue from Operations" as required.

F. Advertising. During the Relevant Period, Respondents failed to display required information on Internet
advertising, including the license name of Respondent Casa on two websites; the NMLS number of
Respondent Casa on five websites; the NMLS MLO number Respondent Brett Mills on one website; and
the required link to the NMLS consumer access web site for Respondent Casa on four websites.

G. Anti-Money Laundering Policy. During the Relevant Period, Respondents failed to have an adequate
anti-money laundering program as required by the Financial Crimes Enforcement Network (FinCEN).

H. Business Resumption Plan. During the Relevant Period, Respondents failed to have a written Business
Resumption Plan. Since at least 2016, the Act has required licensees to have a written Business
Resumption Plan detailing the licensee's response and recovery to any event that results in damage to or
destruction of books and records. Respondent Casa had such an event in November 2018, and allegedly
lost all email records prior to that date.

I. Authorized Settlement Service Provider. On at least one occasion during the relevant period,
Respondents failed to identify an authorized settlement service provider to a Washington borrower for

1 title, escrow, and attorney services, providing to a Washington borrower the identity of a title, escrow,
2 and attorney services provider who was not licensed to provide those services in Washington.

3 **1.5 On-Going Investigation.** The Department's investigation into the alleged violations of the Act by
4 Respondent Casa, Respondent Brett Mills, and Respondent Zindi Mills continues to date.

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

6 **2.1 Responsibility of Designated Brokers and Owners.** Pursuant to RCW 19.146.200(3), every licensed
7 mortgage broker must at all times have a Designated Broker, in this case Respondent Brett Mills, responsible for
8 all activities of the mortgage broker. In addition, Respondent Brett Mills and Respondent Zindi Mills, as the sole
9 owners and principals of Respondent Casa, are responsible for any violations of the Act.

10 **2.2 Responsibility for Conduct of Loan Originators.** Pursuant to RCW 19.146.245, a licensed mortgage broker
11 is liable for any conduct violating the Act by the designated broker, a loan originator, or other licensed mortgage
12 broker while employed or engaged by the licensed mortgage broker.

13 **2.3 False Information.** Based on the Factual Allegations set forth in Section I above, Respondents are in
14 apparent violation of RCW 19.46.0201(2) and (8) for negligently making any false statement, or knowingly and
15 willfully making any omission of material fact, in connection with any reports filed by a licensee with the
16 Department. The conduct further apparently violates RCW 19.46.0201(2) by failing to comply with WAC 208-
17 660-500(3)(h), which prohibits negligently making any false statement, or willfully making any omission of
18 material fact, in connection with any examination conducted by the Department.

19 **2.4 Records Maintenance.** Based on the Factual Allegations set forth in Section I above, Respondents are in
20 apparent violation of RCW 19.146.060(2), which requires that a mortgage broker maintain accurate and current
21 books and records which shall be readily available at a location available to the Director until at least three years
22 have elapsed following the effective period to which the books and records relate. The conduct further apparently
23 violates RCW 19.46.0201(2) by failing to comply with WAC 208-660-450, which requires mortgage brokers to
24 maintain all books and records related to mortgage transactions, including all written disclosures required by the
25 Act and federal laws and regulations, RLAs, and all file correspondence, including e-mail correspondence with
26 borrowers.

1 **2.5 Incomplete, Inaccurate, and Unnecessary Loan Disclosures.** Based on the Factual Allegations set forth in
2 Section I above, Respondents are in apparent violation of RCW 19.146.0201(6) and (11), for failing to make
3 complete and accurate disclosures to borrowers as required by RCW 19.146.030, and for failing to comply with
4 applicable federal laws and regulations, including the Truth in Lending Act, 15 U.S.C. Sec. 1601, and Regulation
5 Z, 12 CFR Section 1026 *et seq.*, and the Real Estate Settlement Procedures Act, 12 U.S.C. Sec. 2601, and
6 Regulation X, 12 CFR Section 1024 *et seq.* The conduct further apparently violates RCW 19.146.0201(2) by
7 making unnecessary loan disclosures.

8 **2.6 Unlicensed Activity.** Based on the Factual Allegations set forth in Section I above, Respondents are in
9 apparent violation of RCW 19.46.200(1) for Respondent Zindi Mills' origination of residential mortgage loans for
10 Washington borrowers without first obtaining and maintaining a Washington MLO license under the Act.

11 **2.7 Mortgage Call Reports.** Based on the Factual Allegations set forth in Section I above, Respondents are in
12 apparent violation of RCW 19.146.390 for failing to file timely MCRs with the Department, and for failing to file
13 complete RMLA reports, a component of the MCR, with the Department.

14 **2.8 Advertising.** Based on the Factual Allegations set forth in Section I above, Respondents are in apparent
15 violation of RCW 19.146.0201(2) for not disclosing on their Internet websites information required by WAC 208-
16 660-446(1) and (2).

17 **2.9 Anti-Money Laundering Policy.** Based on the Factual Allegations set forth in Section I above, Respondents
18 are in apparent violation of RCW 19.146.0201(2) for failing to develop an adequate anti-money laundering policy,
19 and RCW 19.146.0201(11), for failing to comply with FinCEN's anti-money laundering program requirements,
20 codified at 31 CFR § 1029.210.

21 **2.10 Business Resumption Plan.** Based on the Factual Allegations set forth in Section I above, Respondents are
22 in apparent violation of RCW 19.146.0201(2) for failing to develop a business resumption plan, and RCW
23 19.146.0201(11) for failing to comply with the FTC's Standards for Safeguarding Customer Information, codified
24 at 16 CFR § 314.4.

25 **2.11 Authorized Service Provider.** Based on the Factual Allegations set forth in Section I above, Respondents
26 are in apparent violation of RCW 19.146.0201(2) for failing to identify an authorized settlement service provider

1 on the written list of service providers given to one Washington borrower, and RCW 19.146.0201(11), for failing
2 to comply with the Truth in Lending Act and Regulation Z, 12 CFR § 1026.19(e)(1)(vi)(C), which requires the
3 listed settlement service providers actually be available to provide the listed services.

4 III. AUTHORITY TO IMPOSE SANCTIONS

5 **3.1 Authority to Revoke License.** Pursuant to RCW 19.146.220(2), the Director may revoke licenses for any
6 violation of the Act.

7 **3.2 Authority to Prohibit from Industry.** Pursuant to RCW 19.146.220(4), the Director may issue orders
8 removing from office or prohibiting from participation in the conduct of the affairs of a licensed mortgage broker,
9 or both, any officer, principal, or loan originator of any licensed mortgage broker for any violation of the Act.

10 **3.3 Authority to Impose Fine.** Pursuant to RCW 19.146.220(2), the Director may impose fines against a licensee
11 for any violation of the Act.

12 **3.4 Authority to Collect Investigation Fee.** Pursuant to RCW 19.146.228(2), WAC 208-660-520(9) and (11),
13 and WAC 208-660-550(4)(a), the Department will charge forty-eight dollars per hour for an examiner's time
14 devoted to an investigation.

15 **3.5 Authority to Recover Costs and Expenses.** Pursuant to RCW 19.146.221(2), the Director may recover the
16 state's costs and expenses for prosecuting violations of the Act.

17 IV. NOTICE OF INTENT TO ENTER ORDER

18 The violations of the provisions of chapter 19.146 RCW and chapter 208-660 WAC by Respondent Casa
19 Financial Services, Inc., Respondent Brett Mills, and Respondent Zindi Mills, as set forth in the above Factual
20 Allegations, Grounds for Entry of Order, and Authority to Impose Sanctions, constitute a basis for the entry of an
21 Order under RCW 19.146.220, RCW 19.146.221, and RCW 19.146.223. Therefore, it is the Director's intent to
22 ORDER that:

23 **4.1** Respondent Casa Financial Services, Inc.'s Washington license to conduct the business of a
24 mortgage broker be revoked.

25 **4.2** Respondent Brett Mills' Washington license to conduct the business of a mortgage loan
26 originator be revoked.

- 1 **4.3** Respondent Casa Financial Services, Inc., Respondent Brett Mills, and Respondent Zindi
- 2 Mills be prohibited from participation in the conduct of the affairs of any mortgage broker or
- 3 consumer loan company subject to licensure by the Director, in any manner.
- 4 **4.4** Respondent Casa Financial Services, Inc., Respondent Brett Mills, and Respondent Zindi
- 5 Mills jointly and severally pay a fine. As of the date of this Statement of Charges, the fine
- 6 totals \$50,000.
- 7 **4.5** Respondent Casa Financial Services, Inc., Respondent Brett Mills, and Respondent Zindi
- 8 Mills jointly and severally pay an investigation fee. As of the date of this Statement of
- 9 Charges, the investigation fee totals \$1,000.
- 10 **4.6** Respondent Casa Financial Services, Inc., Respondent Brett Mills, and Respondent Zindi
- 11 Mills maintain records in compliance with the Act, and provide the Department with the
- 12 location of the books, records, and other information relating to Respondent Casa's mortgage
- 13 broker business, and the name, address, and telephone number of the individual responsible
- 14 for maintenance of such records in compliance with the Act.
- 15 **4.7** Respondent Casa Financial Services, Inc., Respondent Brett Mills, and Respondent Zindi
- 16 Mills jointly and severally pay the Department's costs and expenses for prosecuting
- 17 violations of the Act in an amount to be determined at hearing or by declaration with
- 18 supporting documentation in event of default.

V. AUTHORITY AND PROCEDURE

The Department enters these Charges pursuant to the provisions of RCW 19.146.220, RCW 19.146.221, RCW 19.146.223, and RCW 19.146.230, and subject to the provisions of the Administrative Procedure Act, RCW 34.05. Respondents may each make a written request for a hearing as set forth in the NOTICE OF OPPORTUNITY FOR ADJUDICATIVE HEARING AND TO DEFEND accompanying these Charges.

Dated this 29th day of April, 2021.

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

Presented by:

Approved by:

 /s/
 ANTHONY W. CARTER
 Senior Legal Examiner

 /s/
 STEVEN C. SHERMAN
 Enforcement Chief