

**Terms Complete**  
**ORDER SUMMARY – Case Number: C-09-488**

**Name(s):** Financial Solutions Law Group f/k/a Echo Loans, Inc.  
Kelly Christensen

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**Order Number:** C-09-488-15-CO01

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**Effective Date:** November 17, 2015

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**License Number:** U/L NMLS ID: 1237764 (Financial Solutions)  
U/L NMLS ID: 1237738 (Christensen)

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**Or NMLS Identifier [U/L]**

**License Effect:** N/A

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**Not Apply Until:** November 17, 2020

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**Not Eligible Until:** November 17, 2020

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**Prohibition/Ban Until:** November 17, 2020

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<b>Investigation Costs</b>	\$1,312.80	Due	Paid <input checked="" type="checkbox"/> Y <input type="checkbox"/> N	Date:
<b>Fine</b>	\$12,000	Due: STAYED	Paid <input type="checkbox"/> Y <input type="checkbox"/> N	Date
<b>Assessment(s)</b>	\$	Due	Paid <input type="checkbox"/> Y <input type="checkbox"/> N	Date
<b>Restitution</b>	\$11,400	Due: 5/31/2016	Paid <input checked="" type="checkbox"/> Y <input type="checkbox"/> N	Date
<b>Judgment</b>	\$	Due	Paid <input type="checkbox"/> Y <input type="checkbox"/> N	Date
<b>Satisfaction of Judgment Filed?</b>		<input type="checkbox"/> Y <input type="checkbox"/> N		
No. of Victims:				

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

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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-09-488-15-CO01

CONSENT ORDER

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FINANCIAL SOLUTIONS LAW GROUP f/k/a  
ECHO LOANS, INC., and  
KELLY CHRISTENSEN, MANAGING  
PARTNER,

Respondents.

COMES NOW the Director of the Department of Financial Institutions (Director), through his  
designee Charles E. Clark, Division Director, Division of Consumer Services, and Financial  
Solutions Law Group f/k/a Echo Loans, Inc. (Respondent Financial Solutions) and Kelly Christensen,  
Managing Partner (Respondent Christensen), 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  
Respondent Financial Solutions and Respondent Christensen (Respondents) have agreed upon a basis  
for resolution of the matters alleged in Statement of Charges No. C-09-488-11-SC01 (Statement of  
Charges), entered January 6, 2012, (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  
5 appeal and hereby waive their right to appeal and any and all administrative and judicial review of the  
6 issues raised in this matter, or of the resolution reached herein. Accordingly, Respondents agree to  
7 dismiss with prejudice their Petition for Judicial Review filed in Thurston County Superior Court,  
8 Cause No. 14-2-01933-2, on or before November 12, 2015.

9 C. **Withdrawal of Final Order.** It is AGREED that Final Order C-09-488-14-FO01 is  
10 withdrawn upon entry of this Consent Order.

11 D. **Prohibition from Industry.** It is AGREED that, for a period of five years from the date  
12 of entry of this Consent Order, Respondents are prohibited from participating, in any capacity, in the  
13 conduct of the affairs of any mortgage broker or loan originator licensed by the Department or  
14 subject to licensure or regulation by the Department.

15 E. **Restitution.** It is AGREED that Respondents, jointly and severally, shall pay restitution  
16 to consumers M.H. in the amount of \$2,000; C.H. and J.H. in the amount of \$2,000; P.K. in the  
17 amount of \$5,000; and J.V. and A.V. in the amount of \$2,400. Respondents shall provide restitution  
18 to the above consumers within six months from the date of entry of this Consent Order, or if  
19 restitution cannot be made to any given consumer escheat such funds to the Washington State  
20 Department of Revenue as unclaimed property in the name of the consumer within six months from the  
21 date of entry of this Consent Order. No later than May 31, 2016, Respondents shall provide the  
22 Department with an affidavit signed by Respondents attesting to the payment of restitution and  
23 providing written proof that the entire restitution amount has either been received by consumers or

1 escheated to the state of Washington. The "written proof" at a minimum must consist of copies of the  
2 front and back of cancelled checks.

3       **F. Stayed Fine.** It is AGREED that Respondents are jointly and severally liable to the  
4 Department for a fine of \$12,000, which shall be stayed until Respondents have provided the  
5 Department with written proof of payment of all restitution, or escheatment there of, to the  
6 Washington State Department of Revenue, of consumer funds as agreed upon pursuant to this  
7 Consent Order. If the Department determines that Respondents failed to fully comply with the  
8 restitution provision (paragraph E) of this Consent Order, then the Department will seek to lift the stay  
9 and impose the fine. It is further AGREED that if the Department does not seek to lift the stay prior  
10 to June 30, 2016, and a proceeding to lift the stay is not then pending, after this date the obligation to  
11 pay the fine will thereafter be deemed withdrawn without further action being required by either  
12 party.

13       **G. Rights of Non-Parties.** It is AGREED that the Department does not represent or have the  
14 consent of any person or entity not a party to this Consent Order to take any action concerning their  
15 personal legal rights. It is further AGREED that for any person or entity not a party to this Consent  
16 Order, this Consent Order does not limit or create any private rights or remedies against Respondents,  
17 limit or create liability of Respondents, or limit or create defenses of Respondents to any claims.

18       **H. Investigation Fee.** It is AGREED that Respondents jointly and severally shall pay to the  
19 Department an investigation fee of \$1,312.80, in the form of a cashier's check made payable to the  
20 "Washington State Treasurer," upon entry of this Consent Order.

21       **I. Change of Address.** It is AGREED that for the duration of the period this Consent Order  
22 is in effect, unless otherwise agreed to in writing by the Department, Respondents shall provide the  
23 Department with a mailing address and telephone number at which Respondents can be contacted and

1 Respondents shall notify the Department in writing of any changes in mailing address or telephone  
2 number within fifteen days of any such change.

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

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

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

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

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

19 **RESPONDENTS:**

20 **Financial Solutions Law Group and Kelly Christensen**

21 By:

22   
23 Kelly Christensen  
24 Managing Member

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11-3-15  
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[Redacted signature]

Kelly Christensen  
Individually

11-3-15  
Date

DO NOT WRITE BELOW THIS LINE

THIS ORDER ENTERED THIS 17<sup>th</sup> DAY OF November, 2015.



[Redacted signature]

SCOTT JARVIS  
Director  
Department of Financial Institutions



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

IN THE MATTER OF DETERMINING  
Whether there has been a violation of the  
Mortgage Broker Practices Act of Washington by:  
  
FINANCIAL SOLUTIONS LAW GROUP f/k/a  
ECHO LOANS, INC., and  
KELLY CHRISTENSEN, MANAGING  
PARTNER,

No. C-09-488-11-SC01

STATEMENT OF CHARGES and  
NOTICE OF INTENTION TO ENTER AN  
ORDER TO CEASE AND DESIST,  
PROHIBIT FROM INDUSTRY, IMPOSE  
FINE, ORDER RESTITUTION, AND  
COLLECT INVESTIGATION FEE

Respondents.

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**INTRODUCTION**

Pursuant to RCW 19.146.220 and RCW 19.146.223, the Director of the Department of  
Financial Institutions of the State of Washington (Director) is responsible for the administration of  
chapter 19.146 RCW, the Mortgage Broker Practices (Act). After having conducted an investigation  
pursuant to RCW 19.146.235, and based upon the facts available as of the date of this Statement of  
Charges, the Director, through his designee, Division of Consumer Services Director Deborah  
Bortner, institutes this proceeding and finds as follows:

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**I. FACTUAL ALLEGATIONS**

**1.1 Respondents.**

A. **Financial Solutions Law Group f/k/a Echo Loans, Inc.** (Respondent Financial  
Solutions) is believed to have been located at 6755 Mira Mesa Blvd., Suite 123-253, San Diego,  
California. Respondent Financial Solutions has never been licensed by the Department of Financial  
Institutions of the State of Washington (Department) to conduct business as a mortgage broker or  
loan originator in the state of Washington.





1 not mean persons performing purely administrative or clerical tasks for a mortgage broker. For the  
2 purposes of this subsection, "administrative or clerical tasks" means the receipt, collection, and  
3 distribution of information common for the processing of a loan in the mortgage industry and  
4 communication with a borrower to obtain information necessary for the processing of a loan. A  
5 person who holds himself or herself out to the public as able to obtain a loan is not performing  
6 administrative or clerical tasks.

7 **2.3 Requirement to Obtain and Maintain Mortgage Broker License.** Based on Factual  
8 Allegations set forth in Section I above, Respondent Financial Solutions Law Group is in apparent  
9 violation of RCW 19.146.200 for engaging in the business of a mortgage broker without first  
10 obtaining and maintaining a license under the Act.

11 **2.4 Requirement to Obtain and Maintain Loan Originator License.** Based on the Factual  
12 Allegations set forth in Section I above, Respondent Kelly Christensen is in apparent violation of  
13 RCW 19.146.200 for engaging in the business of a loan originator without first obtaining and  
14 maintaining a loan originator license under the Act.

15 **2.5 Prohibited Acts.** Based on the Factual Allegations set forth in Section I above, Respondents  
16 are in apparent violation of RCW 19.146.0201(1), (2), and (3) for directly or indirectly employing a  
17 scheme, device or artifice to defraud or mislead borrowers or lenders or any person, engaging in an  
18 unfair or deceptive practice toward any person, or obtaining property by fraud or misrepresentation.

19 **2.6 Requirement to Maintain Books and Records.** Based on Factual Allegations set forth in  
20 Section I above, Respondents are in apparent violation of RCW 19.146.060 for failing to maintain all  
21 books and records in a location that is on file with and readily available to the Department until at  
22 least twenty-five months have elapsed following the effective period to which the books and records  
23 relate.

1 **III. AUTHORITY TO IMPOSE SANCTIONS**

2 **3.1 Authority to Issue an Order to Cease and Desist.** Pursuant to RCW 19.146.220(4), the  
3 Director may issue orders directing a licensee, its employee or loan originator, independent contractor,  
4 agent, or other person subject to the Act to cease and desist from conducting business.

5 **3.2 Authority to Prohibit from Industry.** Pursuant to RCW 19.146.220(5), the Director may  
6 issue orders removing from office or prohibiting from participation in the conduct of the affairs of  
7 licensed mortgage broker, or both, any officer, principal, employee, or loan originator of any licensed  
8 mortgage broker or any person subject to licensing under the Act for any violation of RCW  
9 19.146.0201(1) through (9) or (12), RCW 19.146.200, or failure to comply with a directive or order  
10 of the Director.

11 **3.3 Authority to Impose Fine.** Pursuant to RCW 19.146.220(2)(d), (e), and (3)(a) and (b), the  
12 Director may impose fines on a licensee, employee or loan originator of the licensee, or other person  
13 subject to the Act for any violations of RCW 19.146.020(1) through (9) or (12), RCW 19.146.200, or  
14 failure to comply with a directive or order of the Director.

15 **3.4 Authority to Order Restitution.** Pursuant to RCW 19.146.220(2)(d) and (e), the Director  
16 may issue orders directing a licensee, its employee or loan originator, or other person subject to the  
17 Act to pay restitution to an injured borrower.

18 **3.5 Authority to Collect Investigation Fee.** Pursuant to RCW 19.146.228(2), WAC 208-660-  
19 550(4), and WAC 208-660-520(9), the Department will charge forty-eight dollars per hour for an  
20 examiner's time devoted to an investigation of the books and records of a licensee or other person  
21 subject to the Act.

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1 **IV. NOTICE OF INTENTION 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 intention to ORDER that:

- 6 **4.1** Respondent Financial Solutions Law Group f/k/a Echo Loans, Inc., and Respondent  
7 Kelly Christensen cease and desist engaging in the business of a mortgage broker and  
8 loan originator in the state of Washington or property located in the state of  
9 Washington;
- 9 **4.2** Respondent Financial Solutions Law Group f/k/a Echo Loans, Inc., and Respondent  
10 Kelly Christensen be prohibited from participation in the conduct of the affairs of any  
11 mortgage broker and loan originator subject to licensure by the Director, in any  
12 manner, for a period of five (5) years;
- 11 **4.3** Respondent Financial Solutions Law Group f/k/a Echo Loans, Inc., and Respondent  
12 Kelly Christensen joint and severally pay a fine, which as of the date of this Statement  
13 of Charges totals \$12,000;
- 13 **4.4** Respondent Financial Solutions Law Group f/k/a Echo Loans, Inc., and Respondent  
14 Kelly Christensen joint and severally pay restitution to at least the consumers  
15 identified in paragraph 1.2 above;
- 15 **4.5** Respondent Financial Solutions Law Group f/k/a Echo Loans, Inc., and Respondent  
16 Kelly Christensen joint and severally pay an investigation fee, which as of the date of  
17 this Statement of Charges totals \$720 Calculated at \$48 per hour for fifteen (15) staff  
18 hours devoted to the investigation; and
- 18 **4.6** Respondent Financial Solutions Law Group f/k/a Echo Loans, Inc., and Respondent  
19 Kelly Christensen maintain records in compliance with the Act and provide the  
20 Department with the location of the books, records and other information relating to  
21 Financial Solutions Law Group f/k/a Echo Loans, Inc.'s loan modification business, and  
22 the name, address and telephone number of the individual responsible for maintenance of  
23 such records in compliance with the Act.

21 **V. AUTHORITY AND PROCEDURE**

22 This Statement of Charges is entered pursuant to the provisions of RCW 19.146.220, RCW  
23 221, RCW 19.146.223, and RCW 19.146.230, and is subject to the provisions of chapter 34.05 RCW

1 (The Administrative Procedure Act). Respondents may make a written request for a hearing as set  
2 forth in the NOTICE OF OPPORTUNITY TO DEFEND AND OPPORTUNITY FOR HEARING  
3 accompanying this Statement of Charges.

4  
5 Dated this 6<sup>th</sup> day of January, 2012

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8 DEBORAH BÖRTNER  
9 Director  
10 Division of Consumer Services  
11 Department of Financial Institutions

12 Presented by:

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16 DEBORAH TAELLIUS  
17 Financial Legal Examiner



18 Approved by:

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24 JAMES R. BRUSSELBACK  
Enforcement Chief