Terms Complete ORDER SUMMARY – Case Number: C-16-1921

Name(s):	Youron Ulus Knighton III			
Order Number:	C-16-1921-16-	-CO01		
Effective Date :	09/26/2016			
License Number: Or NMLS Identifier [U/L]	30336 - Application Denied			
License Effect:	Cannot apply for a license in WA State until 09/26/2021			
Not Apply Until:	09/26/2021			
Not Eligible Until:	N/A			
Prohibition/Ban Until:	N/A			
Investigation Costs	\$450.00	Due 11/04/2016	Paid ⊠ Y □ N	Date 10/31/2016
Fine	\$3,000.00	Due 11/04/2016	Paid ⊠ Y □ N	Date 10/31/2016
Assessment(s)	\$	Due	Paid Y N	Date
Restitution	\$	Due	Paid Y N	Date
Judgment	\$	Due	Paid N N	Date
Satisfaction of Judgment Filed? No. of		□ Y ⊠ N	T	
	Victims:	v		
Comments:				

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 Consumer Loan Act of Washington by:

No.: C-16-1921-16-CO01

4 Consumer Loan Ac

CONSENT ORDER

YOURON ULUS KNIGHTON III, Mortgage Loan Originator, NMLS # 1294332,

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Respondent.

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COMES NOW the Director of the Department of Financial Institutions (Director), through his designee Charles E. Clark, Division Director, Division of Consumer Services, and Youron Ulus Knighton III (Respondent), 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 31.04 of the Revised Code of Washington (RCW), and RCW 34.05.060 of the Administrative Procedure Act, based on the following:

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AGREEMENT AND ORDER

The Department of Financial Institutions, Division of Consumer Services (Department) and

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Respondent have agreed upon a basis for resolution of the matters alleged in Statement of Charges No. C-16-1921-16-SC01 (Statement of Charges), entered June 10, 2016, (copy attached hereto). Pursuant to chapter 31.04 RCW, the Consumer Loan Act (Act), and RCW 34.05.060 of the Administrative Procedure Act, Respondent hereby agrees to the Department's entry of this Consent Order and further agrees that the issues raised in the above-captioned matter may be economically and efficiently settled

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by entry of this Consent Order. The parties intend this Consent Order to fully resolve the Statement of

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Charges and agree that the Respondent does not admit any wrongdoing by its entry. Respondent agrees

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to not contest the Statement of Charges in consideration of the terms of this Consent Order.

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Based upon the foregoing:

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- A. **Jurisdiction**. It is AGREED that the Department has jurisdiction over the subject matter of the activities discussed herein.
- B. Waiver of Hearing. It is AGREED that Respondent has been informed of the right to a hearing before an administrative law judge, and hereby waives his right to a hearing and any and all administrative and judicial review of the issues raised in this matter, or of the resolution reached herein. Accordingly, Respondent, by his signature below, withdraws his appeal to the Office of Administrative Hearings.
- C. **No Admission of Liability**. The parties intend this Consent Order to fully resolve the Statement of Charges and agree that Respondent does not admit to any wrongdoing by its entry.
- D. **Mortgage Loan Originator License Application Denial**. It is AGREED that Respondent's mortgage loan originator license application is denied.
- E. **Prohibition from Industry**. It is AGREED that, for a period of five years from the date of entry of this Consent Order, Respondent is prohibited from participating, in any capacity, in the conduct of the affairs of any consumer loan company licensed by the Department or subject to licensure or regulation by the Department. This provision will only apply to business activities within the State of Washington.
- F. **Application for License.** It is AGREED that, for a period of five years from the date of entry of this Consent Order, Respondent shall not apply to the Department for any license under any name. It is further AGREED that, should Respondent apply to the Department for any license under any name at any time later than five years from the date of entry of this Consent Order, Respondent shall be required to meet any and all application requirements in effect at that time.
- G. **Fine**. It is AGREED that Respondent shall pay a fine to the Department in the amount of \$3,000.00, in the form of a cashier's check made payable to the "Washington State Treasurer."

(360) 902-8703

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1	RESPONDENT: Youron Ulus Knighton III, NMLS # 129433	2		
2				
3 4	Youron Ulus Knighton III	_9/21/2016 Date		
5		T WRITE BELOW THIS LINE		
6	THIS ORDER ENTERED THIS 26th DAY OF SEPTEMBER, 2017.			
7		,		
8		/s/		
9		/s/CHARLES E. CLARK Director		
10		Division of Consumer Services Department of Financial Institutions		
11				
12	Dan and address			
13	Presented by:			
14	IGOR VOLOSHIN			
15	11			
16	Approved by:			
17	_/s/			
18	STEVEN C. SHERMAN Enforcement Chief			
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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 Consumer Loan Act of Washington by:

No. C-16-1921-16-SC01

YOURON ULUS KNIGHTON III,

STATEMENT OF CHARGES AND NOTICE OF INTENTION TO ENTER AN ORDER TO DENY LICENSE APPLICATION, PROHIBIT FROM INDUSTRY, IMPOSE FINE, COLLECT INVESTIGATION FEE, AND RECOVER COSTS AND EXPENSES

Mortgage Loan Originator, NMLS # 1294332,

Respondent.

INTRODUCTION

Pursuant to RCW 31.04.165 and RCW 31.04.168, the Director of the Department of Financial Institutions of the State of Washington (Director) is responsible for the administration of chapter 31.04 RCW, the Consumer Loan Act (Act). After having conducted an investigation pursuant to RCW 31.04.055 and 31.04.145, 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 Charles E. Clark, institutes this proceeding and finds as follows:

I. FACTUAL ALLEGATIONS

1.1 Youron Ulus Knighton III (Respondent) submitted an application to the Department of Financial Institutions of the State of Washington (Department) for a mortgage loan originator license (MLO) under Paramount Equity Mortgage, LLC, a consumer loan company licensed under the Act. The license application was received by the Department, through the Nationwide Mortgage Licensing System and Registry (NMLS), on or about January 27, 2016. Respondent subsequently attempted to withdraw his MLO license on March 14, 2016. At this time, the MLO license application is pending.

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¹ RCW 31.04 (Amended 2009; Effective January 1, 2010) STATEMENT OF CHARGES C-16-1921-16-SC01

Youron Ulus Knighton III

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

1	1.2 Prior Criminal Acts. On or about November 16, 1992, the Sacramento Superior Court		
2	entered Respondent's guilty plea to a felony crime meeting the language of RCW 31.04.247(1)(d)(ii)		
3	and WAC 208-620-710(4)(c)(ii).		
4	1.3 Misstatement to the Department. Respondent's MLO application required the submission		
5	of a Uniform Individual Mortgage License/Registration & Consent form (Form MU4), which consist		
6	of a series of questions. The following question is included in the Form MU4 under the Criminal		
7	Disclosure section:		
8	Have you ever been convicted of or pled guilty or nolo contendere ("no contest") in a domestic, foreign, or military court to any felony?		
9	Respondent answered "no" to this question. Respondent was obligated by statute to answer questions		
10	on Form MU4 truthfully and to provide the Department with complete details of all relevant events o		
11	proceedings. Respondent did not provide details, documents, or other statements to the Department		
12	regarding any past felony conviction. On or about January 27, 2016, Respondent attested, under		
13	penalty of perjury, that the information and statements contained within the Form MU4 are "current,		
14	true, accurate, and complete[.]"		
15	1.4 On-Going Investigation. The Department's investigation into the factual allegation		
16	continues to date.		
17	II. GROUNDS FOR ENTRY OF ORDER		
18	2.1 Requirement of No Prior Convictions. Based on the Factual Allegations set forth in Section		
19	I above, Respondent fails to meet the requirements of RCW 31.04.247(1)(d)(ii) and WAC 208-620-		
20	710(4)(c)(ii) by having pled guilty to a felony crime involving an act of dishonesty.		
21	2.2 False Statements and Omissions of Material Facts. Based on the Factual Allegations set		
22	forth in Section I above, Respondent is in apparent violation of RCW 31.04.027(8) and WAC 208-		
23	620-550(6) for negligently making any false statements or knowingly and willfully making any		
24	STATEMENT OF CHARGES 2 DEPARTMENT OF FINANCIAL INSTITUTIONS C-16-1921-16-SC01 Division of Consumer Services Youron Ulus Knighton III 150 Israel Rd SW		

1	statements that omitted material facts in connection with any report filed with the Department by a		
2	licensee or in connection with any investigation conducted by the Department.		
3	III. AUTHORITY TO IMPOSE SANCTIONS		
4	3.1 Authority to Deny Application for Loan Originator License. Pursuant to RCW		
5	31.04.247(2), the Director shall not issue a license if the conditions of RCW 31.04.247(1) have not		
6	been met by the applicant, and shall notify the applicant of the denial.		
7	3.2 Authority to Prohibit from the Industry. Pursuant to RCW 31.04.093(6), the Director may		
8	issue an order prohibiting from participation in the affairs of any licensee, any officer, principal,		
9	employee, or any other person subject to the Act for a violation of RCW 31.04.027.		
10	3.3 Authority to Impose Fine. Pursuant to RCW 31.04.093(4), the Director may impose fines of		
11	up to one hundred dollars per day, per violation, upon the licensee, its employee or loan originator, or		
12	any other person subject to the Act for any violation of the Act.		
13	3.4 Authority to Collect Investigation Fee. Pursuant to RCW 31.04.145(3) and WAC 208-620-		
14	590(1), the Director may recover the state's cost and expenses for investigating violations of the Act.		
15	The Department will charge the target of the investigation \$69.01 per hour.		
16	3.5 Authority to Recover Costs and Expenses. Pursuant to RCW 31.04.205(2), the Director		
17	may recover the state's costs and expenses for prosecuting violations of the Act.		
18	IV. NOTICE OF INTENTION TO ENTER ORDER		
19	Respondent's failure to meet the applicable licensing requirements of chapter 31.04 RCW and		
20	chapter 208-620 WAC, as set forth in the above Factual Allegations, Grounds for Entry of Order, and		
21	Authority to Impose Sanctions, constitute a basis for the entry of an Order under RCW 31.04.055,		
22	RCW 31.04.093, RCW 31.04.165, RCW 31.04.168, and RCW 31.04.247. Therefore, it is the		
23	Director's intention to ORDER that:		

1	4.1	4.1 Respondent Youron Ulus Knighton III's application for a mortgage loan originator license be denied.		
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3	4.2 Respondent Youron Ulus Knighton III be prohibited from participation in the corn of the affairs of any consumer loan company subject to licensure by the Director, any manner, for a period of five years.			
4	4.2			
5	4.3	Respondent Youron Ulus Knighton III pay a fine. As of the date of this Statement of Charges, the fine totals \$3,000.00.		
6	4.4	4.4 Respondent Youron Ulus Knighton III pay an investigation fee. As of the date of the Statement of Charges, the investigation fee totals \$450.00.		
7	4.5	Descendent Voyage Illus Vnighten III nov the Department's costs and eveness for		
8 prosecuting violations of the Act in an amount to be determined at hea		Respondent Youron Ulus Knighton III 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 Respondent.		
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	V. AUTHORITY AND PROCEDURE			
11	This Statement of Charges and Nation of Intention to Enter an Order to Dany License			
12	This Statement of Charges and Notice of Intention to Enter an Order to Deny License			
13	Application, Prohibit From Industry, Impose Fine, Collect Investigation Fee, and Recover Costs and			
14	Expenses (Statement of Charges) is entered pursuant to the provisions of RCW 31.04.093, RCW			
	31.04.165, RCW 31.04.168, and RCW 31.04.202, and is subject to the provisions of chapter 34.05			
15 16	RCW, the Administrative Procedure Act. Respondent may make a written request for a hearing as			
	set forth in the NOTICE OF OPPORTUNITY TO DEFEND AND OPPORTUNITY FOR HEARING			
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18	accompanying this Statement of Charges.			
19	Dated this 10 ^t	h day of June, 20176.		
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22		/s/ CHARLES E. CLARK		
۷۷		Director		
23		Division of Consumer Services		
24	STATEMENT OF C	Department of Financial Institutions Department of Financial Institutions		
	STATEMENT OF C C-16-1921-16-SC01 Youron Ulus Knight	Division of Consumer Services		
		(360) 902-8703		

1	Presented by:		
2	_/s/_ IGOR VOLOSHIN	-	
3	Financial Legal Examiner		
4			
5	Approved by:		
6	_/s/_ STEVEN C. SHERMAN	-	
7	Enforcement Chief		
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24	STATEMENT OF CHARGES	5	DEPARTMENT OF FINANCIAL INSTITUTIONS

Division of Consumer Services 150 Israel Rd SW

PO Box 41200 Olympia, WA 98504-1200 (360) 902-8703

C-16-1921-16-SC01 Youron Ulus Knighton III