

**ORDER SUMMARY – Case Number: C-14-1512**

**Name(s):** Network Solutions Center, Inc. d/b/a Rescue Firm  
Serj Geutssoyan

**Order Number:** C-14-1512-16-FO01

**Effective Date:** December 12, 2016

**License Number:** N/A  
**Or NMLS Identifier [U/L]**

**License Effect:** N/A

**Not Apply Until:**

**Not Eligible Until:** December 13, 2021

**Prohibition/Ban Until:** December 13, 2021

<b>Investigation Costs</b>	\$1,586.40	Due January 12, 2017	Paid <input type="checkbox"/> Y <input checked="" type="checkbox"/> N	Date
<b>Fine</b>	\$3,000.00	Due January 12, 2017	Paid <input type="checkbox"/> Y <input checked="" type="checkbox"/> N	Date
<b>Assessment(s)</b>	\$	Due	Paid <input type="checkbox"/> Y <input type="checkbox"/> N	Date
<b>Restitution</b>	\$1,995.00	Due January 12, 2017	Paid <input type="checkbox"/> Y <input checked="" 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 checked="" type="checkbox"/> N		
No. of Victims:		two		

**Comments:**

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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:

No.: C-14-1512-16-FO01

5 NETWORK SOLUTIONS CENTER, INC.  
D/B/A RESCUE FIRM, and SERJ  
6 GEUTSSOYAN, President

FINAL ORDER RE:

Network Solutions Center, Inc. d/b/a Rescue  
Firm, and Serj Geutssoyan

7 Respondents.

8 **I. DIRECTOR'S CONSIDERATION**

9 A. Default. This matter has come before the Acting Director of the Department of  
10 Financial Institutions of the State of Washington (Director), through her designee, Consumer  
11 Services Division Director Charles E. Clark (Director's designee), pursuant to RCW 34.05.440(1).  
12 On November 2, 2016, the former Director, through the Director's designee, issued a Statement of  
13 Charges and Notice of Intent to Enter an Order to Cease and Desist Business, Prohibit from Industry,  
14 Order Restitution, Impose Fine, Collect Investigation Fee, and Collect Costs and Expenses  
15 (Statement of Charges) against Network Solutions Center, Inc. d/b/a Rescue Firm and Serj  
16 Geutssoyan (Respondents). A copy of the Statement of Charges is attached and incorporated into this  
17 order by this reference. The Statement of Charges was accompanied by a cover letter dated  
18 November 3, 2016, a Notice of Opportunity to Defend and Opportunity for Hearing, and blank  
19 Applications for Adjudicative Hearing for Respondents (collectively, accompanying documents).

20 On November 3, 2016, the Department served Respondents with the Statement of Charges  
21 and accompanying documents by First-Class mail and Federal Express overnight delivery. The  
22 Statement of Charges and accompanying documents were delivered by Federal Express to  
23 Respondent Network Solutions Center, Inc. d/b/a Rescue Firm's Registered Agent for service of

1 process, Incorp Services Inc., on November 4, 2016. The Department received a letter from Incorp  
2 Services, Inc. on November 15, 2016, acknowledging receipt.

3 The Statement of Charges and accompanying documents were delivered by Federal Express  
4 to Respondent Geutssoyan's legal counsel, Ron Cordova, Esq. on November 4, 2016. The Statement  
5 of Charges and accompanying documents sent by first class U.S. mail to Respondent Geutssoyan's  
6 legal counsel were not returned to the Department by the United States Postal Service.

7 Pursuant to WAC 208-08-050(2), Respondents had twenty (20) days from the date of service  
8 of the Statement of Charges and accompanying documents to request a hearing. Neither Respondent  
9 requested an adjudicative hearing within twenty calendar days after the Department served the Notice  
10 of Opportunity to Defend and Opportunity for Hearing, as provided for in WAC 208-08-050(2).

11 B. Record Presented. The record presented to the Director's designee for his review and  
12 for entry of a final decision included the following:

- 13 1. Statement of Charges, cover letter dated November 3, 2016, Notice of Opportunity  
14 to Defend and Opportunity for Hearing, and blank Application for Adjudicative  
Hearing for Respondent, with documentation of service.

15 C. Factual Findings and Grounds for Order. Pursuant to RCW 34.05.440(1), the  
16 Director's designee hereby adopts the Statement of Charges, which is attached hereto.

## 17 II. FINAL ORDER

18 Based upon the foregoing, and the Director's designee having considered the record and being  
19 otherwise fully advised, NOW, THEREFORE:

20 A. IT IS HEREBY ORDERED, That:

- 21 1. Respondents Network Solutions Center, Inc. d/b/a Rescue Firm and Serj  
22 Geutssoyan cease and desist engaging in the business of a mortgage broker.  
23 2. Respondents Network Solutions Center, Inc. d/b/a Rescue Firm and Serj  
Geutssoyan are prohibited from participation, in any manner, in the conduct of the

1 affairs of any mortgage broker subject to licensure by the Director for a period of  
2 five years.

- 3 3. Respondents Network Solutions Center, Inc. d/b/a Rescue Firm and Serj  
4 Geutssoyan jointly and severally pay restitution to the consumers identified in  
5 Paragraph 1.2 in the attached Statement of Charges in the amount set forth therein  
6 within thirty (30) days of entry of this order; and that Respondents jointly and  
7 severally pay restitution to each Washington consumer from whom they collected  
8 money for or with whom they entered into a contract for residential mortgage loan  
9 modification services related to real property or consumers located in the state of  
10 Washington equal to the amount collected from that Washington consumer for  
11 those services.
- 12 4. Respondents Network Solutions Center, Inc. d/b/a Rescue Firm and Serj  
13 Geutssoyan jointly and severally pay the State of Washington Department of  
14 Financial Institutions, within thirty (30) days of entry of this order, a fine of three  
15 thousand dollars (\$3,000.00)
- 16 5. Respondents Network Solutions Center, Inc. d/b/a Rescue Firm and Serj  
17 Geutssoyan jointly and severally pay an investigation fee of one thousand five  
18 hundred eighty six dollars and forty cents (\$1,586.40) to the State of Washington  
19 Department of Financial Institutions within thirty (30) days of entry of this order.
- 20 6. Respondents Network Solutions Center, Inc. d/b/a Rescue Firm and Serj  
21 Geutssoyan maintain records in compliance with chapter 19.146 RCW, the  
22 Mortgage Broker Practices Act (Act) and provide the Director with the location of  
23 the books, records and other information relating to Respondents' loan  
24 modification business, and the name, address and telephone number of the  
individual responsible for maintenance of such records in compliance with the Act.

17 B. Reconsideration. Pursuant to RCW 34.05.470, each Respondent has the right to file a  
18 Petition for Reconsideration stating the specific grounds upon which relief is requested. The Petition  
19 must be filed in the Office of the Director of the Department of Financial Institutions by courier at  
20 150 Israel Road SW, Tumwater, Washington 98501, or by U.S. Mail at P.O. Box 41200, Olympia,  
21 Washington 98504-1200, within ten (10) days of service of the Final Order upon Respondents. The  
22 Petition for Reconsideration shall not stay the effectiveness of this order nor is a Petition for  
23 Reconsideration a prerequisite for seeking judicial review in this matter.

1 A timely Petition for Reconsideration is deemed denied if, within twenty (20) days from the  
2 date the petition is filed, the agency does not (a) dispose of the petition or (b) serve the parties with a  
3 written notice specifying the date by which it will act on a petition.

4 C. Stay of Order. The Director's designee has determined not to consider a Petition to  
5 Stay the effectiveness of this order. Any such requests should be made in connection with a Petition  
6 for Judicial Review made under chapter 34.05 RCW and RCW 34.05.550.

7 D. Judicial Review. Each Respondent has the right to petition the superior court for  
8 judicial review of this agency action under the provisions of chapter 34.05 RCW. For the  
9 requirements for filing a Petition for Judicial Review, see RCW 34.05.510 and sections following.

10 E. Non-compliance with Order. If you do not comply with the terms of this order,  
11 **including payment of any amounts owed within 30 days of receipt of this order**, the Department  
12 may seek its enforcement by the Office of the Attorney General to include the collection of the fines,  
13 fees, and restitution imposed herein. The Department also may assign the amounts owed to a  
14 collection agency for collection.

15 F. Service. For purposes of filing a Petition for Reconsideration or a Petition for Judicial  
16 Review, service is effective upon deposit of this order in the U.S. mail, declaration of service  
17 attached hereto.

18 DATED this 12<sup>th</sup> day of December, 2016.

19  
20 STATE OF WASHINGTON  
DEPARTMENT OF FINANCIAL INSTITUTIONS

21  
22 /s/ \_\_\_\_\_  
CHARLES E. CLARK  
23 Director  
Division of Consumer Services

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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:

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NETWORK SOLUTIONS CENTER, INC. d/b/a  
RESCUE FIRM and SERJ GEUTSSOYAN,  
President,

Respondents.

No. C-14-1512-16-SC01

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

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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 (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 Charles E. Clark, institutes this proceeding and finds as follows:

**I. FACTUAL ALLEGATIONS**

**1.1 Respondents.**

**A. Respondent Network Solutions Center, Inc. d/b/a Rescue Firm (Respondent RF)** has never been licensed by the Department of Financial Institutions of the State of Washington (Department) to conduct business as a mortgage broker.

**B. Respondent Serj Geutssoyan (Respondent Geutssoyan)** is or was the president of Respondent RF. Respondent Geutssoyan has never been licensed by the Department to conduct business as a mortgage broker or loan originator.

1 **1.2 Unlicensed Activity.** Between at least August 2013 and September 2013, Respondents were  
2 offering residential mortgage loan modification services to Washington consumers for loans secured  
3 by an interest in residential property located in Washington State. Respondents provided or offered to  
4 provide residential mortgage loan modification services while not licensed by the Department.  
5 Respondents entered into a contractual relationship with at least two Washington consumers to provide  
6 those services and collected an advance fee for the provision of those services. In September 2013  
7 consumers FS and TS paid an advance fee of \$1,995.00 to Respondents for loan modification services.  
8 The personal check was made payable to "Rescue Firm" and was deposited into Respondent RF's  
9 checking account. Respondent Geutssoyan was the sole authorized signer on Respondent RF's  
10 checking account on the date the check was deposited and paid.

11 **1.3 Misrepresentations and Omissions.** Respondents represented that they were licensed to  
12 provide the residential mortgage loan modification services or omitted disclosing that they were not  
13 licensed to provide those services.

14 **1.4 On-Going Investigation.** The Department's investigation into the alleged violations of the  
15 Act by Respondents continues to date.

## 16 II. GROUNDS FOR ENTRY OF ORDER

17 **2.1 Mortgage Broker Defined.** Pursuant to RCW 19.146.010(14) and WAC 208-660-006,  
18 "Mortgage broker" means any person who for direct or indirect compensation or gain, or in the  
19 expectation of direct or indirect compensation or gain (a) assists a person in obtaining or applying to  
20 obtain a residential mortgage loan or performs residential mortgage loan modification services or (b)  
21 holds himself or herself out as being able to assist a person in obtaining or applying to obtain a  
22 residential mortgage loan or provide residential mortgage loan modification services.

23 **2.2 Loan Originator Defined.** Pursuant to RCW 19.146.010(11)(b), "Loan originator" means a  
24 natural person who for direct or indirect compensation or gain or in the expectation of direct or

1 indirect compensation or gain performs residential mortgage loan modification services or holds  
2 himself or herself out as being able to perform residential mortgage loan modification services.

3 **2.3 Requirement to Obtain and Maintain Mortgage Broker License.** Based on the Factual  
4 Allegations set forth in Section I above, Respondents are in apparent violation of RCW 19.146.200(1)  
5 for engaging in the business of a mortgage broker for Washington residents or property without first  
6 obtaining a license to do so.

7 **2.4 Requirement to Obtain and Maintain Loan Originator License.** Based on the Factual  
8 Allegations set forth in Section I above, Respondent Geutssoyan is in apparent violation of RCW  
9 19.146.200(1) for engaging in the business of a loan originator without first obtaining and maintaining  
10 a license.

11 **2.5 Prohibition against Taking Advance Fees.** Based on the Factual Allegations set forth in  
12 Section I above, Respondents are in apparent violation of RCW 19.146.0201(11) and 12 CFR 1015.5(a)  
13 for taking advance fees for loan modification services.

14 **2.6 Prohibited Acts.** Based on the Factual Allegations set forth in Section I above, Respondents  
15 are in apparent violation of RCW 19.146.0201(2) & (3) for engaging in an unfair or deceptive practice  
16 toward any person and obtaining property by fraud or misrepresentation.

### 17 III. AUTHORITY TO IMPOSE SANCTIONS

18 **3.1 Authority to Issue an Order to Cease and Desist.** Pursuant to RCW 19.146.220(4), the  
19 Director may issue orders directing any person subject to the Act to cease and desist from conducting  
20 business.

21 **3.2 Authority to Prohibit from Industry.** Pursuant to RCW 19.146.220(5), the Director may  
22 issue orders prohibiting from participation in the conduct of the affairs of a licensed mortgage broker  
23 any person subject to licensing under the Act for any violation of RCW 19.146.0201(1) through (9) or  
24 (13) or RCW 19.146.300.



1 **3.3 Authority to Order Restitution.** Pursuant to RCW 19.146.220(2), the Director may order  
2 restitution against any person subject to the Act for any violation of the Act.

3 **3.4 Authority to Impose Fine.** Pursuant to RCW 19.146.220(2), the Director may impose fines  
4 against any person subject to the Act for any violation of the Act.

5 **3.5 Authority to Collect Investigation Fee.** Pursuant to RCW 19.146.228(2) and WAC 208-660-  
6 550(4)(a), the Department will charge forty-eight dollars per hour for an examiner's time devoted to  
7 an investigation of any person subject to the Act.

8 **3.6 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, as  
12 set forth above, constitute a basis for the entry of an Order under RCW 19.146.220, RCW 19.146.221,  
13 and RCW 19.146.223. Therefore, it is the Director's intent to ORDER that:

14 **4.1** Respondents Network Solutions, Inc. d/b/a Rescue Firm and Serj Geutssoyan cease and desist  
15 engaging in the business of a mortgage broker or loan originator.

16 **4.2** Respondents Network Solutions, Inc. d/b/a Rescue Firm and Serj Geutssoyan be prohibited  
17 from participation, in any manner, in the conduct of the affairs of any mortgage broker subject  
18 to licensure by the Director for a period of five years.

19 **4.3** Respondents Network Solutions, Inc. d/b/a Rescue Firm and Serj Geutssoyan jointly and  
20 severally pay restitution to the consumers identified in paragraph 1.2 totaling \$1,995.00, and  
21 that Respondents jointly and severally pay restitution to each Washington consumer from  
22 whom they collected money for or with whom they entered into a contract for residential  
23 mortgage loan modification services related to real property or consumers located in the state  
24 of Washington equal to the amount collected from that Washington consumer for those  
services in an amount to be determined at hearing.

**4.4** Respondents Network Solutions, Inc. d/b/a Rescue Firm and Serj Geutssoyan jointly and  
severally pay a fine, which as of the date of this Statement of Charges totals \$3,000.00

**4.5** Respondents Network Solutions, Inc. d/b/a Rescue Firm and Serj Geutssoyan jointly and  
severally pay an investigation fee, which as of the date of this Statement of Charges totals  
\$1,586.40.

1 4.6 Respondents Network Solutions, Inc. d/b/a Rescue Firm and Serj Geutssoyan maintain records  
2 in compliance with the Act and provide the Department with the location of the books, records  
3 and other information relating to Respondents' provision of residential mortgage loan  
4 modification services in Washington, and the name, address and telephone number of the  
5 individual responsible for maintenance of such records in compliance with the Act.

6 4.7 Respondents Network Solutions, Inc. d/b/a Rescue Firm and Serj Geutssoyan pay the  
7 Department's costs and expenses for prosecuting violations of the Act in an amount to be  
8 determined at hearing or by Declaration with supporting documentation in event of default by  
9 Respondents.

### 10 V. AUTHORITY AND PROCEDURE

11 This Statement of Charges is entered pursuant to the provisions of RCW 19.146.220, RCW  
12 19.146.221, RCW 19.146.223, and RCW 19.146.230, and is subject to the provisions of chapter 34.05  
13 RCW (The Administrative Procedure Act). Respondent(s) may make a written request for a hearing as  
14 set forth in the NOTICE OF OPPORTUNITY TO DEFEND AND OPPORTUNITY FOR HEARING  
15 accompanying this Statement of Charges.

16 Dated this 2<sup>nd</sup> day of November, 2016.



17 [Redacted Signature]  
18 CHARLES E. CLARK  
19 Director, Division of Consumer Services  
20 Department of Financial Institutions

21 Presented by:

22 [Redacted Signature]  
23 JANET MILAM RUMER  
24 Financial Legal Examiner Supervisor

1 Approved by:

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3 STEVEN C. SHERMAN  
4 Enforcement Chief

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