

Terms Completed

ORDER SUMMARY – Case Number: C-17-2297

Respondents: United Mortgage Corp.
Mark Rosenbloom, President
Nicole Paige, Secretary

Order Number: C-17-2297-19-CO01

Effective Date: March 29, 2019

NMLS Numbers: United Mortgage Corp.: NMLS No. 1330
Mark Rosenbloom: NMLS No. 324643
Nicole Paige: NMLS No. 1138099

License Effect: None.

Prohibitions: None.

Investigation Costs	\$ 5,000	Due: Upon delivery of signed CO to DFI	Paid: <input checked="" type="checkbox"/> Y <input type="checkbox"/> N	Date: 3/26/19
Fine (\$50,000 paid, and \$200,000 stayed.)	\$ 250,000	Due in quarterly installments; see below	Paid: <input type="checkbox"/> Y <input checked="" type="checkbox"/> N	Date: Per CO
Financial Literacy	\$ 50,000	Due: \$25,000 upon delivery of signed CO to DFI; the \$25,000 balance due in quarterly installments; see below	Paid: <input type="checkbox"/> Y <input checked="" type="checkbox"/> N	Date: 3/26/19 Date:Paid Per CO

Comments: The \$50,000 fine, plus the \$25,000 balance of the Financial Literacy payment, will be paid in three equal quarterly payments of \$25,000, due no later than the last day of June, September, and December 2019.

Respondents Rosenbloom and Paige do not admit to any wrongdoing by the entry of this Consent Order. The Department accepted Respondents' representations that upon receiving a subpoena in this matter they temporarily ceased advertising in Washington.

Respondents were ordered to henceforth comply with the Consumer Loan Act of Washington when advertising in Washington.

Within 12 months of entry of the CO, at the Department's convenience and at Respondents' cost, Respondent United Mortgage Corp. shall be subject to a full-scope in-office (vs. on-site) compliance examination. Depending on the assigned risk rating, the stayed \$200,000 fine may be imposed pursuant to the Consent Order.

If the stayed \$200,000 fine is not imposed within the two-year stay, it shall not be imposed and shall expire without further notice.

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
Consumer Loan Act of Washington by:

No. C-17-2297-19-CO01

CONSENT ORDER

5 UNITED MORTGAGE CORP., d/b/a United Faith
Mortgage, NMLS No. 1330;
6 MARK ROSENBLOOM, President,
NMLS No. 324643; and
7 NICOLE PAIGE, Secretary and Senior Vice
President, NMLS No. 1138099,
8 Respondents.

9 COMES NOW the Director of the Department of Financial Institutions (Director), through her
10 designee Charles E. Clark, Division Director, Division of Consumer Services, and United Mortgage
11 Corp. (Respondent UMC); Mark Rosenbloom (Respondent Rosenbloom); and Nicole Paige (Respondent
12 Paige) (collectively, Respondents), by and through their counsel, Haydn J. Richards, Jr. of Bradley Arant
13 Boulton Cummings LLP, and finding that the issues raised in the above-captioned matter may be
14 economically and efficiently settled, agree to the entry of this Consent Order. This Consent Order is
15 entered pursuant to chapter 31.04 of the Revised Code of Washington (RCW), and RCW 34.05.060 of
16 the Administrative Procedure Act, based on the following:

17 **AGREEMENT AND ORDER**

18 The Department of Financial Institutions, Division of Consumer Services (Department) and
19 Respondents have agreed upon a basis for resolution of the matters alleged in the attached Statement of
20 Charges No. C-17-2297-18-SC01 (Charges), entered August 7, 2018. Pursuant to chapter 31.04 RCW,
21 the Consumer Loan Act (the Act), and RCW 34.05.060 of the Administrative Procedure Act,
22 Respondents hereby agree to the Department's entry of this Consent Order (Order).

23 **Based upon the foregoing:**

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1 **A. Jurisdiction.** It is AGREED that the Department has jurisdiction over the subject matter of the
2 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 herein.
6 Accordingly, Respondents, by their signatures and the signatures of their representatives below, withdraw
7 their appeal of the Charges to the Office of Administrative Hearings.

8 **C. No Admission of Liability.** It is AGREED that this Order represents a compromise and is for
9 settlement purposes only. Neither Respondent Rosenbloom nor Respondent Paige admit to any
10 wrongdoing by the entry of this Order. It is further AGREED that Respondents will not make any public
11 statement that is inconsistent with the terms of this Order, and that nothing in this Order affects
12 Respondents' testimonial obligations or right to take legal or factual positions in defense of any
13 subsequent administrative proceedings or civil litigation.

14 **D. Cessation of Advertising and Future Compliance.** It is AGREED that Respondents, through
15 counsel, have represented and warranted to the Department that upon receipt of the subpoena issued in
16 this matter, Respondent UMC temporarily ceased all advertising in Washington. It is FURTHER
17 AGREED and ORDERED that Respondents shall henceforth comply with the Act and the rules adopted
18 thereunder, now existing and as hereafter amended, when advertising in Washington.

19 **E. Fine (Partially Stayed).** It is AGREED that Respondents are jointly and severally liable to the
20 Department for a fine of \$300,000. It is FURTHER AGREED and ORDERED that in compromise and
21 settlement of this matter, Respondents shall pay a fine to the Department in the amount of \$250,000, with
22 \$50,000 (the Paid Fine) paid pursuant to Paragraph K, Payments, below, and payment of the \$200,000
23 balance (the Stayed Fine) stayed for two (2) years from the date of entry of this Order, contingent upon
24 Respondents' compliance with the Act and this Order.

1 **F. Expiration of Stayed Fine.** It is AGREED that absent an action by the Department to lift the
2 stay and impose the Stayed Fine pursuant to Paragraph H, below, the Stayed Fine will expire two (2)
3 years from the date of entry of this Order without further notice or action by the Department.

4 **G. Compliance Examination.** Subject to the Department's availability, within one (1) year of the
5 entry of this Order, at Respondents' cost, the Department will conduct an in-office (as opposed to on-site)
6 compliance examination of Respondents' business practices, policies, and procedures, including
7 Respondents' advertising compliance and compliance with this Order. At the conclusion of the
8 examination the Department will generate a Report of Examination (ROE) Risk Rating.

- 9 1. With a Risk Rating of one (1) or two (2), the Department will not impose the Stayed Fine,
10 which may subsequently expire pursuant to Paragraph F, above.
- 11 2. With a Risk Rating of three (3), the Department may lift and impose the Stayed Fine
12 pursuant to Paragraph H, below.
- 13 3. With a Risk Rating of four (4) or five (5), the Department will lift and impose the Stayed
14 Fine pursuant to Paragraph H, below, and may pursue other enforcement action necessary
15 for the enforcement of the Act, this Order, or the protection of the public.
- 16 4. Regardless of the assigned Risk Rating, Respondents must respond to and address all
17 findings in the ROE, and timely pay the invoice for the compliance examination conducted
18 by the Department pursuant to this Order. Failure to timely pay the examination invoice is
19 a breach of this Order.

20 **H. Lifting of Stay and Imposition of Stayed Fine.** It is AGREED and ORDERED that:

- 21 1. If during the two (2) year stay, the Department determines that any Respondent has not
22 complied with the Act or this Order, and the Department seeks to lift and impose the Stayed
23 Fine, the Department will first serve that Respondent with a written notice of noncompliance
24 that will include:
 - 25 a. A description of the Department's determination of noncompliance identifying the
26 Respondent(s) determined to have violated the Act or this Order;
 - 27 b. A statement that the Department seeks to lift and impose the Stayed Fine;
 - 28 c. Notice that the identified Respondent(s) can contest the Department's determination
29 of noncompliance either by requesting an adjudicative hearing at the Office of
30 Administrative Hearings, or by submitting a written response to the Department; and

1 d. Notice that the process provided in this Paragraph applies only to this Order and
2 solely in the event the identified Respondent(s) contest(s) the Department's
3 determination of noncompliance.

4 2. Any identified Respondent who wishes to contest the Department's determination of
5 noncompliance will have twenty (20) days from the date of service of the Department's
6 notice to:

7 a. Submit a written request to the Department for an adjudicative hearing, or

8 b. Submit for consideration by the Department a written response contesting the
9 determination of noncompliance. The response must include the identified Respondent's
10 waiver of the right to an adjudicative hearing, may address the determination of
11 noncompliance, and may propose alternative resolutions to lifting and imposing the
12 Stayed Fine.

13 3. The scope and issues of the adjudicative hearing will be limited solely to whether or not the
14 identified Respondent(s) has not complied with the Act or this Order.

15 4. At the conclusion of the hearing the Office of Administrative Hearings will issue an initial
16 decision. Any party to the hearing may file a Petition for Review of that initial decision
17 with the Director of the Department.

18 5. **DEFAULT:** If any identified Respondent does not timely request an adjudicative hearing,
19 or submit a written response to the Department, the Department may lift and impose the
20 Stayed Fine, and may pursue other enforcement action necessary for the enforce the Act,
21 this Order, or the protection of the public.

22 **I. Investigation Fee.** It is AGREED and ORDERED that Respondent shall pay to the Department
23 an investigation fee of \$5,000 pursuant to Paragraph K, Payments, below.

24 **J. Financial Literacy Payment.** Pursuant to RCW 31.04.093(7), the Director may accept payments
to the Department for purposes of financial literacy and education programs as authorized. Accordingly,
in further compromise and settlement of this matter, it is AGREED that Respondents shall pay \$50,000 to
the Department for purposes of financial literacy and education programs (the "Financial Literacy
Payment"), pursuant to Paragraph K, Payments, below. It is FURTHER AGREED and ORDERED that
pursuant to RCW 31.04.093(7), Respondents shall not advertise the Financial Literacy Payment.

K. Payments. It is AGREED and ORDERED that the \$5,000 Investigation Fee and \$25,000
towards the Financial Literacy Payment shall be paid upon delivery by Respondents to the Department

1 this fully executed Order in one cashier's check for \$30,000 made payable to the "Washington State
2 Treasurer." It is further AGREED and ORDERED that the \$75,000 balance of the Paid Fine and the
3 Financial Literacy Payment shall be paid in three (3) equal quarterly payments of \$25,000. Payments
4 shall be made via cashier's check for \$25,000 made payable to the "Washington State Treasurer," and
5 shall be delivered to the Department so that they are received no later than the last day of June,
6 September, and December 2019.

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

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

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

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

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

4
5 **RESPONDENTS:**

6
7 /s/ _____ 3-25-19 _____
8 Mark Rosenbloom Date
9 Individually and as Co-Owner and President of United Mortgage Corp.

10 /s/ _____ 3-25-19 _____
11 Nicole Paige Date
12 Individually and as Co-Owner, Secretary, and Vice President of United Mortgage Corp.

13 Approved for Entry:

14 Bradley Arant Boult Cummings LLP

15 /s/ _____ March 25, 2019 _____
16 Haydn J. Richards, Jr., Esq. Date
17 Counsel for United Mortgage Corp., Mark Rosenbloom, and Nicole Paige

18 DO NOT WRITE BELOW THIS LINE

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1 THIS ORDER ENTERED THIS 29th DAY OF MARCH 2019.

2
3 /s/ _____
4 CHARLES E. CLARK
5 Director, Division of Consumer Services
6 Department of Financial Institutions
7

8 Presented by:

Approved by:

9
10 /s/ _____
11 ANTHONY W. CARTER
12 Senior Legal Examiner
13 Consumer Services Enforcement Unit
14 Department of Financial Institutions
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/s/ _____
STEVEN C. SHERMAN
Enforcement Chief
Consumer Services Enforcement Unit
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
Consumer Loan Act of Washington by:

5 UNITED MORTGAGE CORP., d/b/a United Faith
Mortgage, NMLS No. 1330;
6 MARK ROSENBLOOM, President,
NMLS No. 324643; and
7 NICOLE PAIGE, Secretary and Senior Vice
President, NMLS No. 1138099,

8 Respondents.

No. C-17-2297-18-SC01

STATEMENT OF CHARGES and NOTICE OF
INTENT TO ENTER AN ORDER TO REVOKE
LICENSE, PROHIBIT FROM INDUSTRY,
IMPOSE FINE, COLLECT INVESTIGATION
FEE, and RECOVER COSTS AND EXPENSES
OF PROSECUTION

9 **INTRODUCTION**

10 Pursuant to RCW 31.04.093 and RCW 31.04.165, the Director of the Washington State Department
11 of Financial Institutions (Director) is responsible for the administration of chapter 31.04 RCW, the
12 Consumer Loan Act (Act).¹ Having conducted an investigation pursuant to RCW 31.04.145, and based
13 upon the facts available as of the date of this Statement of Charges (Charges), the Director, through her
14 designee, Division of Consumer Services Director Charles E. Clark, institutes this proceeding and alleges
15 as follows:

16 **I. FACTUAL ALLEGATIONS**

17 **1.1 Respondents and Licensure.**

18 **A. Respondent United Mortgage Corp. (Respondent UMC).** The Washington State Department
19 of Financial Institutions (Department) licensed Respondent UMC to conduct business in Washington
20 under the Consumer Loan Act (Act) on or about February 28, 2017. Respondent UMC uses the
21 Washington-registered trade name United Faith Mortgage in Washington. Respondent UMC renewed its
22 consumer loan license with the Department in February 2018, and remains licensed to date.

23
24 ¹ The Act was amended effective June 7, 2018. All citations to the Act in these Charges are to the version effective prior to that date.

1 **B. Mark Rosenbloom (Respondent Rosenbloom).** Respondent Rosenbloom is the President and
2 50% owner of Respondent UMC.

3 **C. Respondent Nicole Paige (Respondent Paige).** Respondent Paige is the Secretary, Senior VP,
4 and 50% owner of Respondent UMC. The Department licensed Respondent Paige as a mortgage loan
5 originator on or about February 28, 2017; she renewed her mortgage loan originator license with the
6 Department in February 2018; and she remains licensed to date.

7 **1.2 Direct Mail Solicitations.** Respondent UMC, Respondent Rosenbloom, and Respondent Paige
8 (Respondents) caused two direct mail solicitations to be delivered to some 22,000 Washington consumers
9 in 2017. The solicitations, identified by Respondents as the FHA Mailer and the VA Mailer, contained
10 numerous violations of the Act as set forth below:

11 **A. FHA Mailer.** Respondents advised the Department that it made seven separate mailings of the
12 FHA Mailer to Washington consumers between April 26, 2017, and November 3, 2017. Though
13 requested in a Subpoena, Respondents did not report the number of FHA Mailers distributed in
14 Washington. However, Respondents reported they received 350 responses, and 25 loan applications,
15 from Washington consumers in response to the FHA mailer. Four Washington consumers filed
16 complaints concerning the deceptive nature of the FHA mailer, which:

- 17 • Listed in the top right corner the Department’s name as “WA Department of
18 Financial Institutions (“DFI”),” along with Respondent UMC’s Department-issued
license number, NMLS number, and license expiration date.
- 19 • Provided the subject matter of the FHA Mailer as:

20 **Information Regarding FHA MIP Reduction**
21 **Pursuant to Section 203(C)(2)(B) Of the National**
22 **Housing Act (“NHA”) in Conjunction with**
23 **Change in Federal Reserve Policy**

- 24 • Referenced and included a copy of HUD’s 2-page Mortgagee Letter 2015-01 issued
on January 1, 2015. Printed on HUD letterhead with the HUD seal and a
Washington, DC address, the Assistant Secretary of Housing – Federal Housing
Commissioner issued the Mortgagee Letter to all HUD-approved mortgagees.

- 1 • Advised recipients that they were eligible for a MIP reduction “as reflective in
2 mortgage letter 2015-01, subject to the conditions therein.”
- 3 • Warned recipients that due to rate increases by the Federal Reserve, the recipients’
4 “potential eligibility to MIP reduction may expire....”
- 5 • Advised recipients they could open a “case number” by either calling a toll-free
6 number, or by returning “the enclosed MIP Reduction Request Form....”
- 7 • The MIP Reduction Request Form included the recipients’ then-current mortgage
8 loan information.

9 **B. VA Mailer.** Respondents advised the Department that it made two separate mailing of the VA
10 Mailer to Washington consumers during May 2017. Though requested in a Subpoena, Respondents did
11 not report the number of VA Mailers distributed in Washington or the number of Washington consumers
12 who responded to or applied for loans in response to the VA Mailer. Like the FHA Mailer, the VA Mailer
13 listed the Department’s name in the top right corner; advised recipients they could open a “case number”
14 by either calling a toll-free number, or by returning “the enclosed VA Home Loan Benefit Eligibility
15 Form....;” and provided the recipients’ then-current mortgage loan information on that form. The only
16 material differences between the FHA and VA Mailers was the subject matter and the absence of HUD’s
17 Mortgagee Letter 2015-01. The subject matter of the VA Mailer was as follows:

18 **Notice of Potential Eligibility to Elimination of**
19 **Mortgage Insurance Premium (“MIP”) Through**
20 **Utilization of Home Loan Benefits as Provided by**
21 **the Department of Veteran Affairs**

22 **1.3 Internet and Social Media Advertising.** Respondents advertised residential mortgage loan
23 products, both forward and reverse mortgages, in Washington on numerous Internet and social media
24 websites. On or about October 13, 2017, and again between March 2 and March 8, 2018, the Department
25 reviewed Respondents’ Internet and social media advertising and found numerous violations of the Act
26 as set forth below:

27 //

1 **A. Internet Advertising:** Respondents advertised on the Internet websites unitedmortgage.com,
2 zoomreverse.com, unitedfaithmortgage.com, and try.unitedfaithmortgage.com, some of which:

- 3 • Failed to include links to the NMLS Consumer Access webpage.
- 4 • Claimed that Respondents deliver the best interest rates and mortgage loan terms;
5 that their interest rates are among the lowest in the country; that they offer unique
6 programs not offered by most lenders; and that on refinance loans Respondents can
7 provide borrowers with up to two months with no mortgage payment.
- 8 • Claimed, with respect to Respondents' Home Equity Conversion Mortgage
9 (HECM) loans, that there are no monthly payments with a reverse mortgage, and
10 that repayment of a reverse mortgage is not necessary until the borrower sells the
11 property, moves into a retirement community or passes away.
- 12 • Claimed, in the audio portion of a video describing Respondents' HECM loans, that
13 borrowers can eliminate their mortgage payments forever, and that the only
14 difference between a forward mortgage loan and a reverse mortgage loan is that
15 borrowers "just don't make monthly payments anymore."
- 16 • Claimed that Respondents' HECM loan was available with no closing costs.
- 17 • Failed to include, in a conspicuous location, that the information relating to
18 Respondents' HECM loans was not from HUD or FHA, and was not approved by HUD,
19 FHA, or any government agency.

20 **B. Social Media Advertising.** Respondents advertised on the social media webpages YouTube,
21 Facebook, Yelp, and Twitter, some of which:

- 22 • Failed to include Respondent UMC's NMLS number and/or links to the NMLS
23 Consumer Access webpage.
- 24 • Provided only 5-star reviews of Respondent UMC.

25 **1.4 Failure to Comply with Investigative Authority.** On or about March 8, 2018, the Department
26 issued a Subpoena Duces Tecum to Provide Explanations and Documents to Respondent UMC. On or
27 about April 13, 2018, Respondent Rosenbloom filed Respondent UMC's response to the subpoena with
28 the Department. Respondents failed to completely comply with the Subpoena, including by failing to
29 substantiate some of the express and implied claims described above.

1 **1.5 On-Going Investigation.** The Department’s investigation into the alleged violations of the Act by
2 Respondents continues to date.

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

4 **2.1 Unfair or Deceptive Practices.** Based on the Factual Allegations set forth above, Respondents are
5 in apparent violation of RCW 31.04.027(2), WAC 208-620-550(5), and WAC 208-620-630(1), (5), (6),
6 and (7) for directly or indirectly engaging in unfair or deceptive advertising practices.

7 **2.2 False or Deceptive Statements or Representations.** Based on the Factual Allegations set forth
8 above, Respondents are in apparent violation of RCW 31.04.027(7) and WAC 208-620-550(20) for
9 making, in any manner, any false or deceptive statement or representation with regard to the conditions
10 for a mortgage loan.

11 **2.3 False, Misleading, or Deceptive Advertisements.** Based on the Factual Allegations set forth
12 above, Respondents are in apparent violation of RCW 31.04.135 and WAC 208-620-550(20) for
13 advertising, in any manner whatsoever, any statement or representation with regard to the conditions for
14 the lending of money that is false, misleading, or deceptive.

15 **2.4 Violations of Applicable State and Federal Laws and Regulations.** Based on the Factual
16 Allegations set forth above, Respondents are in apparent violation of RCW 31.04.027(13) and WAC 280-
17 620-640 for advertising in violation of applicable federal laws and regulations, including the Federal
18 Trade Commission Act and Regulation N, the Mortgage Acts and Practices – Advertising rule.

19 **III. AUTHORITY TO IMPOSE SANCTIONS**

20 **3.1 Authority to Revoke Licenses.** Pursuant to RCW 31.04.093(3), the Director may revoke licenses
21 issued under the Act for (b) knowingly or without the exercise of due care violating any provision of the
22 Act or any rule adopted thereunder, or for (d), failing to comply with a subpoena issued under the Act.

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1 **3.2 Authority to Prohibit from the Industry.** Pursuant to RCW 31.04.093(6), the Director may issue an
2 order prohibiting from participation in the affairs of any licensee any officer or principal of a licensee for (e)
3 a violation of RCW 31.04.027.

4 **3.3 Authority to Impose Fines.** Pursuant to RCW 31.04.093(4), the Director may impose fines of up to
5 one hundred dollars per day, per violation, upon licensees for (a) any violation of the Act, or for (b),
6 failing to comply with a subpoena issued under the Act.

7 **3.4 Authority to Collect Investigation Fees.** Pursuant to RCW 31.04.145(3) and WAC 208-620-590,
8 every licensee investigated by the Director shall pay for the cost of the investigation calculated at the rate
9 of \$69.01 per staff hour devoted to the investigation.

10 **3.5 Authority to Recover Costs and Expenses.** Pursuant to RCW 31.04.205(2), the Director may
11 recover the state's costs and expenses for prosecuting violations of the Act.

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

13 Respondents' violations of the provisions of chapter 31.04 RCW and chapter 208-620 WAC, as set
14 forth in the above Factual Allegations, Grounds for Entry of Order, and Authority to Impose Sanctions,
15 constitute a basis for the entry of an Order under RCW 31.04.093, RCW 31.04.165, and RCW 31.04.205.
16 Therefore, it is the Director's intent to ORDER that:

17 **4.1** Respondent United Mortgage Corp.'s license to conduct the business of a consumer
18 loan company under the Act be revoked.

19 **4.2** Respondents Mark Rosenbloom and Nicole Paige be prohibiting from participation in
20 the affairs of any consumer loan company licensed by, or subject to licensures by, the
21 Director, in any manner or capacity, for a period of five (5) years.

22 **4.3** Respondents United Mortgage Corp., Mark Rosenbloom, and Nicole Paige jointly and
23 severally pay a fine. As of the date of these Charges, the fine totals \$300,000.

24 **4.4** Respondents United Mortgage Corp., Mark Rosenbloom, and Nicole Paige jointly and
severally pay an investigation fee. As of the date of these Charges, the investigation
fee totals \$3,795.55.

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