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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:

No.: C-05-174-11-CO01

CONSENT ORDER

AMERICA MORTGAGE, INC., and  
LEE WILLIAM WHITESIDE, President, Owner,  
and Designated Broker,

Respondents.

COMES NOW the Director of the Department of Financial Institutions (Director), through his  
designee Deborah Bortner, Division Director, Division of Consumer Services, and America  
Mortgage, Inc. (Respondent America Mortgage), and Lee William Whiteside, President, Owner, and  
Designated Broker (Respondent Whiteside), 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  
Respondents have agreed upon a basis for resolution of the matters alleged in Statement of Charges  
No. C-05-174-08-SC01 (Statement of Charges), entered September 22, 2010, (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 on 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 a  
5 hearing before an administrative law judge, and hereby waive their right to a hearing and any and all  
6 administrative and judicial review of the issues raised in this matter, or of the resolution reached  
7 herein. Accordingly, Respondents, by their signatures below, withdraw their appeal to the Office of  
8 Administrative Hearings.

9 C. **Mortgage Broker License Revocation.** It is AGREED that Respondent America  
10 Mortgage's license to conduct the business of a mortgage broker is revoked.

11 D. **Loan Originator License Revocation.** It is AGREED that Respondent Whiteside's  
12 license to conduct the business of a loan originator is revoked.

13 E. **Prohibition from Mortgage Broker Industry.** It is AGREED that Respondents are  
14 prohibited from ever participating in the conduct of the affairs of any mortgage broker licensed by the  
15 Department or subject to licensure or regulation by the Department under the Act, in any capacity.

16 F. **Prohibition from Consumer Loan Industry.** It is AGREED that Respondents are  
17 prohibited from ever participating in the conduct of the affairs of any consumer lender licensed by the  
18 Department or subject to licensure or regulation by the Department under chapter 31.04 RCW, the  
19 Consumer Loan Act, in any capacity.

20 G. **Application for License.** It is AGREED that Respondents shall never apply to the  
21 Department for any license under any name or on behalf of any person or entity.

22 H. **Records Retention.** It is AGREED that Respondent Whiteside shall maintain records  
23 related to Respondent America Mortgage's mortgage broker business in compliance with the Act.

1 I. **Authority to Execute Order.** It is AGREED that the undersigned have represented and  
2 warranted that they have the full power and right to execute this Consent Order on behalf of the  
3 parties represented.

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

8 K. **Voluntarily Entered.** It is AGREED that the undersigned Respondents have voluntarily  
9 entered into this Consent Order, which is effective when signed by the Director's designee.

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

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1 **RESPONDENTS:**

2 **America Mortgage, Inc.**

3 By:

4 Lee William Whiteside  
Lee William Whiteside  
President, Owner, and Designated Broker

3/18/2011  
Date

5 Lee William Whiteside  
6 Lee William Whiteside  
7 Individually

3/18/2011  
Date

8 Jeffrey C. Mirsepasy  
9 Jeffrey C. Mirsepasy, WSBA No. 17247  
Attorney for Respondents

3/18/2011  
Date

10 **DO NOT WRITE BELOW THIS LINE**

11 THIS ORDER ENTERED THIS 4<sup>th</sup> DAY OF April, 2011



13 Deborah Bortner  
14 DEBORAH BORTNER  
15 Director  
16 Division of Consumer Services  
Department of Financial Institutions

17 Presented by:  
18 Mark T. Olson

19 MARK T. OLSON  
20 Financial Legal Examiner

21 Approved by:  
22 James R. Brusselback

23 JAMES R. BRUSSELBACK  
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  
Mortgage Broker Practices Act of Washington by:

NO. C-05-174-08-SC01

AMERICA MORTGAGE, INC., and  
LEE WILLIAM WHITESIDE, President, Owner,  
and Designated Broker,

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

Respondents.

**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)<sup>1</sup>. 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:

**I. FACTUAL ALLEGATIONS**

**1.1 Respondents.**

A. **America Mortgage, Inc. (Respondent America Mortgage)** was licensed by the Department of Financial Institutions of the State of Washington (Department) to conduct business as a mortgage broker on or about February 25, 2003, and continued to be licensed until its license expired on December 31, 2008.<sup>2</sup>

B. **Lee William Whiteside (Respondent Whiteside)** is President, Owner, and Designated Broker of Respondent America Mortgage. Respondent Whiteside was named Designated Broker of Respondent

<sup>1</sup> The Act, effective in 1994, was amended in 2006, with the changes effective January 1, 2007. Alleged violations referenced in this Statement of Charges that occurred in 2006 or before are cited as violating the 1994 Act; those that occurred in 2007 or later are cited as violating the 2007 Act.

<sup>2</sup> Respondent America Mortgage's mortgage broker license was originally issued to "Lee William Whiteside, d/b/a Balance Finance," as a sole proprietorship. Respondent Whiteside amended his sole proprietorship's license to "d/b/a America Mortgage" in or around May 2003, and further amended the form of his licensed entity to the corporation "America Mortgage, Inc." in or around January 2005.

1 America Mortgage on or about February 25, 2003, and continued as Designated Broker until Respondent  
2 América Mortgage's mortgage broker license expired on December 31, 2008. Respondent Whiteside's  
3 Designated Broker license also expired on December 31, 2008.

4 **1.2 Prohibited Acts.** From in or around April 2005 through in or around June 2006, Christopher G.  
5 Brooks and Amani R. Moss a/k/a Amani R. Brooks (the Brookses) originated at least 18 residential mortgage  
6 loans, totaling at least \$5,890,000 and involving 9 properties, under Respondent America Mortgage's mortgage  
7 broker license. In these transactions, the Brookses misrepresented borrowers' information to lenders in order to  
8 obtain the residential mortgage loans, and directed closing agents to disburse over \$1,600,000 of seller proceeds  
9 at closing to Peachtree Development, an entity the Brookses owned or controlled, without disclosure to the  
10 lenders. Respondent America Mortgage received over \$45,000 in mortgage broker fees at the closing of these  
11 transactions, and Respondent Whiteside was the borrower in one of these transactions. The lenders foreclosed  
12 on all 9 of the subject properties when the borrowers (including Respondent Whiteside) stopped making  
13 payments on the underlying residential mortgage loans, resulting in losses to the lenders of over \$1,900,000.<sup>3</sup>

14 A. **Respondent Whiteside as Borrower.** In or around February 2006, the Brookses assisted  
15 Respondent Whiteside in obtaining two residential mortgage loans totaling \$1,685,000 to purchase property  
16 located at 6507 240<sup>th</sup> Way NE, Redmond, Washington (240<sup>th</sup> property). In this transaction, the Brookses and  
17 Respondent Whiteside misrepresented Respondent Whiteside's information to the lender, including Respondent  
18 Whiteside's income and intent to occupy the 240<sup>th</sup> property as his primary residence. The Brookses directed the  
19 closing agent to disburse over \$778,000 of the seller's proceeds to Peachtree Development at the closing of the  
20 transaction. In or around November 2006, a Notice of Trustee's Sale was recorded scheduling a Trustee's Sale  
21 for the 240<sup>th</sup> property and indicating Respondent Whiteside had not made payments totaling over \$76,000 on  
22 the underlying residential mortgage loans since at least March 1, 2006 (first payment default). In or around  
23 March 2007, the 240<sup>th</sup> property was sold at a Trustee's Sale for \$1,347,360, resulting in a loss to the lender of  
24 over \$413,000.

25 <sup>3</sup> In 2009, the Brookses pleaded guilty to a federal criminal indictment for their role in at least 18 residential mortgage loan transactions, including at least five of the transactions discussed in this Statement of Charges.

1           B.       **Borrower B.F. (BF).** In or around April 2005, the Brookses assisted BF in obtaining at least  
2 eight residential mortgage loans totaling \$1,805,000 to purchase at least the following four subject properties.

- 3                   • 838 NE 86<sup>th</sup> St, Seattle, Washington (2 loans totaling \$475,000)
- 4                   • 915 S 304<sup>th</sup> St, Federal Way, Washington (2 loans totaling \$465,000)
- 5                   • 31016 230<sup>th</sup> Pl SE, Black Diamond, Washington (2 loans totaling \$430,000)
- 6                   • 4613 SW Wildwood Pl, Seattle, Washington (2 loans totaling \$435,000)

7 In these transactions, the Brookses misrepresented BF's information to lenders, including BF's employment,  
8 income, assets, liabilities, and intent to occupy each subject property as BF's primary residence. The Brookses  
9 directed the closing agents to disburse over \$181,000 of the sellers' proceeds to Peachtree Development at the  
10 closing of these transactions. Between in or around March 2006 and in or around June 2006, Notices of  
11 Trustee's Sale were recorded scheduling Trustee's Sales for all four properties and indicating BF had not made  
12 payments totaling over \$62,000 on the underlying residential mortgage loans. From in or around June 2006  
13 through in or around November 2006, all four properties were foreclosed and sold for a total of approximately  
14 \$1,518,000, resulting in losses to the lenders of over \$349,000.

15           C.       **Borrower C.R. (CR).** From in or around January 2006 through in or around June 2006, the  
16 Brookses assisted CR in obtaining at least eight residential mortgage loans totaling \$2,400,000 to purchase at  
17 least the following four subject properties.

- 18                   • 7316 California Ave SW, Seattle, Washington (2 loans totaling \$635,000)
- 19                   • 13133 166<sup>th</sup> Ave SE, Renton, Washington (2 loans totaling \$290,000)
- 20                   • 11044 Woodward Ave S, Seattle, Washington (2 loans totaling \$375,000)
- 21                   • 17006 SE 12<sup>th</sup> Pl, Bellevue, Washington (2 loans totaling \$1,100,000)

22 In these transactions, the Brookses misrepresented CR's information to lenders, including CR's employment,  
23 income, assets, liabilities, and intent to occupy each subject property as CR's primary residence. The Brookses  
24 directed the closing agents to disburse over \$666,000 of the sellers' proceeds to Peachtree Development at the  
25 closing of these transactions. Between in or around July 2006 and in or around May 2009, Notices of Trustee's  
Sale were recorded scheduling Trustee's Sales for all four properties and indicating CR had not made payments  
totaling over \$258,000 on the underlying residential mortgage loans. From in or around February 2007 through

1 in or around September 2009, all four properties were foreclosed and sold for a total of approximately  
2 \$1,450,000, resulting in losses to the lenders of over \$1,200,000.

3 **1.3 Failure to Maintain Funds in Trust.** At the time of initial licensure, Respondent Whiteside provided  
4 the Department with a notarized "Mortgage Broker Trust Monies Alternative Certificate of Compliance"  
5 containing the following language:

6 "I, the undersigned, designated broker of the above listed entity, an applicant for licensing under  
7 chapter 19.146 RCW, The Mortgage Broker Practices Act (the "Act"), certify that I have read and  
8 understand RCW 19.146.050 and WAC 208-660-08010 through -08040, containing the requirements  
9 for the management of borrowers' funds. I realize that any violation of this section of the Act is a Class  
10 C Felony.

11 I further warrant that the above company and its principals, mortgage brokers, employees, loan  
12 originators, and independent contractors will not, at any time, up to and including the closing of a loan  
13 and disbursement of any monies associated with the loan, accept monies from a borrower, or from a  
14 third-party (e.g., and escrow agent) on behalf of a borrower, for the purposes of payment for services  
15 (e.g., an appraisal or credit report) provided by third parties."

16 Respondent America Mortgage received trust funds from or on behalf of borrowers for the payment of third-  
17 party provider services, usually from the closing agent at the closing of the related residential mortgage loans, in  
18 at least two of the transactions discussed in paragraph 1.2 above.

19 **1.4 Failure to Respond to Directives and Subpoenas.** On or about April 30, 2008, and on or about May  
20 1, 2008, the Department sent directives related to two consumer complaints to Respondent America Mortgage's  
21 licensed location by First-Class mail. These directives were not returned by the United States Post Office. On  
22 or about June 9, 2008, the Department sent subpoenas related to these consumer complaints to Respondent  
23 America Mortgage's licensed location by Federal Express overnight delivery. On or about June 11, 2008, both  
24 subpoenas were delivered to Respondents via Federal Express, signed for by Respondent Whiteside. To date,  
25 the Department has not received a response to any of these directives and subpoenas.

**1.5 Failure to Submit Mortgage Broker Closure Form and Annual Report.** Respondent America  
Mortgage did not renew its mortgage broker license by December 31, 2008. To date, Respondents have not  
provided the Department with the Mortgage Broker Closure Form and Annual Report required within twenty  
days after a licensed mortgage broker ceases doing business in the State of Washington.

1 **1.6 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 Responsibility for Conduct of Loan Originators.** Pursuant to RCW 19.146.245, a licensed mortgage  
5 broker is liable for any conduct violating the Act by the designated broker or a loan originator while employed  
6 or engaged by the licensed mortgage broker. Pursuant to RCW 19.146.200(1) [1994 Act], a person who  
7 independently contracts with a licensed mortgage broker need not be licensed if the licensed mortgage broker  
8 and the independent contractor have on file with the Director a binding written agreement under which the  
9 licensed mortgage broker assumes responsibility for the independent contractor's violations of any provision of  
10 the Act.

11 **2.2 Responsibility of Designated Broker.** Pursuant to RCW 19.146.200(4) [2007 Act], every licensed  
12 mortgage broker must at all times have a designated broker responsible for all activities of the mortgage broker  
13 in conducting the business of a mortgage broker. A designated broker, principal, or owner who has supervisory  
14 authority over a mortgage broker is responsible for a licensee's, employee's, or independent contractor's  
15 violations of the Act if: the designated broker, principal, or owner directs or instructs the conduct or, with  
16 knowledge of the specific conduct, approves or allows the conduct; or the designated broker, principal, or  
17 owner who has supervisory authority over the licensed mortgage broker knows or by the exercise of reasonable  
18 care and inquiry should have known of the conduct, at a time when its consequences can be avoided or  
19 mitigated and fails to take reasonable remedial action.

20 **2.3 Prohibited Acts.** Based on the Factual Allegations set forth in Section I above, Respondents are in  
21 apparent violation of RCW 19.146.0201(1), (2) and (3) for directly or indirectly employing a scheme, device or  
22 artifice to defraud or mislead borrowers or lenders or any person, engaging in an unfair or deceptive practice  
23 toward any person, and obtaining property by fraud or misrepresentation.

24 **2.4 Requirement to Maintain Funds From Borrower for Payment of Third-Party Providers in Trust.**

25 Based on the Factual Allegations set forth in Section I above, Respondents are in apparent violation of RCW

1 19.146.050 for failing to deposit funds received from a borrower or on behalf of a borrower for payment of  
2 third-party provider services in a trust account of a federally insured financial institution located in this state,  
3 prior to the end of the third business day following receipt of such monies, and for commingling operating  
4 funds with trust account funds.

5 **2.5 Requirement to Comply with Directives and Subpoenas.** Based on the Factual Allegations set forth  
6 in Section I above, Respondents are in apparent violation of RCW 19.146.235 for failing to comply with  
7 Department directives and subpoenas.

8 **2.6 Requirement to Submit a Mortgage Broker Closure Form and Annual Report.** Based on the  
9 Factual Allegations set forth in Section I above, Respondents are in apparent violation of WAC 208-660-  
10 163(19)<sup>4</sup> and WAC 208-660-400(14)<sup>5</sup> for failing to submit a mortgage broker closure form and annual report  
11 within 20 days after ceasing operations in Washington.

12 **2.7 Requirement to Maintain Accurate and Current Books and Records.** Pursuant to RCW 19.146.060  
13 [2007 Act] and WAC 208-660-450(4), Respondents are required to keep all books and records in a location that  
14 is on file with and readily available to the Department until at least twenty-five months have elapsed following  
15 the effective period to which the books and records relate.

### 16 III. AUTHORITY TO IMPOSE SANCTIONS

17 **3.1 Authority to Revoke License.** Pursuant to RCW 19.146.220(2)(b)(iv) [1994 Act], the Director may  
18 revoke a license for any violation of RCW 19.146.0201(1) through (9), or RCW 19.146.050. Pursuant to RCW  
19 19.146.220(2)(d) & (e) [2007 Act], the Director may revoke licenses for: failure to comply with any directive,  
20 order, or subpoena of the Director; or any violation of the Act.

21 **3.2 Authority to Prohibit from the Industry.** Pursuant to RCW 19.146.220(2)(e)(i) [1994 Act], the  
22 Director may issue orders removing from office or prohibiting from participation in the conduct of the affairs of  
23 a licensed mortgage broker, or both, any officer, principal, employee, or loan originator of any licensed  
24 mortgage broker or any person subject to licensing under the Act for any violation of RCW 19.146.0201(1)

25 <sup>4</sup> WAC 208-660-163(18) as of the date of this Statement of Charges.

<sup>5</sup> WAC 208-660-400(12) as of the date of this Statement of Charges.

1 through (9). Pursuant to RCW 19.146.220(5)(a) & (d) [2007 Act], the Director may issue orders removing from  
2 office or prohibiting from participation in the conduct of the affairs of a licensed mortgage broker, or both, any  
3 officer, principal, employee, or loan originator of any licensed mortgage broker or any person subject to  
4 licensing under the Act for: any violation of RCW 19.146.0201(1) through (9); or failure to comply with any  
5 directive or order of the Director.

6 **3.3 Authority to Impose Fine.** Pursuant to RCW 19.146.220(2)(c)(i) [1994 Act], the Director may impose  
7 fines on a licensee, employee or loan originator of the licensee, or other person subject to the Act for any  
8 violations of RCW 19.146.0201(1) through (9), or RCW 19.146.030 through RCW 19.146.080. Pursuant to  
9 RCW 19.146.220(2)(d) & (e) [2007 Act], the Director may impose fines against licensees or other persons  
10 subject to the Act for: failure to comply with any directive, order, or subpoena of the Director; or any violation  
11 of the Act. Pursuant to RCW 19.146.220(3) [2007 Act], the Director may impose fines on an employee,  
12 independent contractor, or agent of the licensee, or other person subject to the Act for: any violation of RCW  
13 19.146.0201(1) through (9), or RCW 19.146.030 through RCW 19.146.080; or failure to comply with any  
14 directive or order of the Director.

15 **3.4 Authority to Collect Investigation Fee.** Pursuant to RCW 19.146.228(2) and WAC 208-660-550(4)(a),  
16 the Department will charge forty-eight dollars per hour for an examiner's time devoted to an investigation of the  
17 books and records of a licensee or other person 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, as set forth  
3 in the above Factual Allegations, Grounds for Entry of Order, and Authority to Impose Sanctions, constitute a basis  
4 for the entry of an Order under RCW 19.146.220, RCW 19.146.221 and RCW 19.146.223. Therefore, it is the  
5 Director's intention to ORDER that:

- 6 4.1 Respondent America Mortgage, Inc.'s license to conduct the business of a mortgage broker be revoked.
- 7 4.2 Respondent Lee William Whiteside's license to conduct the business of a loan originator be revoked.
- 8 4.3 Respondent America Mortgage, Inc. be prohibited from participation in the conduct of the affairs of any  
9 mortgage broker subject to licensure by the Director, in any manner, for a period of ten years.
- 10 4.4 Respondent Lee William Whiteside be prohibited from participation in the conduct of the affairs of any  
11 mortgage broker subject to licensure by the Director, in any manner, for a period of ten years.
- 12 4.5 Respondents America Mortgage, Inc. and Lee William Whiteside jointly and severally pay a fine. As of  
13 the date of this Statement of Charges, the fine totals \$100,000.
- 14 4.6 Respondents America Mortgage, Inc. and Lee William Whiteside jointly and severally pay an investigation  
15 fee. As of the date of this Statement of Charges, the investigation fee totals \$12,000.
- 16 4.7 Respondents America Mortgage, Inc. and Lee William Whiteside maintain records in compliance with the  
17 Act and provide the Department with the location of the books, records and other information relating to  
18 Respondent America Mortgage, Inc's mortgage broker business, and the name, address and telephone  
19 number of the individual responsible for maintenance of such records in compliance with the Act.

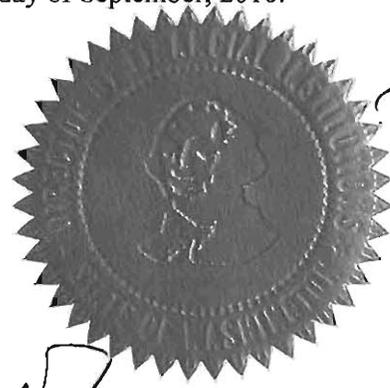
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**V. AUTHORITY AND PROCEDURE**

This Statement of Charges and Notice of Intention to Enter an Order to Revoke Licenses, Prohibit from Industry, Impose Fine, and Collect Investigation Fee (Statement of Charges) is entered pursuant to the provisions of RCW 19.146.220, RCW 19.146.221, RCW 19.146.223 and RCW 19.146.230, and is subject to the provisions of chapter 34.05 RCW (The Administrative Procedure Act). Respondents may make a written request for a hearing as set forth in the NOTICE OF OPPORTUNITY TO DEFEND AND OPPORTUNITY FOR HEARING accompanying this Statement of Charges.

Dated this 22<sup>nd</sup> day of September, 2010.



*Deborah Bortner*

DEBORAH BORTNER  
Director  
Division of Consumer Services  
Department of Financial Institutions

Presented by:

*Mark T. Olson*

MARK T. OLSON  
Financial Legal Examiner

Approved by:

*James R. Brusselback*

JAMES R. BRUSSELBACK  
Enforcement Chief