

Terms Completed

ORDER SUMMARY – Case Number: C-07-114

Name(s): Sylvester Abraham Reesves, Jr.

Order Number: C-07-114-07-FO01

Effective Date: March 21, 2008

License Number: DFI: 37442 [NMLS: 243894]

Or NMLS Identifier [U/L] (Revoked, suspended, stayed, application denied or withdrawn)

License Effect: None
If applicable, you must specifically note the ending dates of terms.

Not Apply Until: April 3, 2008

Not Eligible Until: _____

Prohibition/Ban Until: _____

Investigation Costs	\$	Due	Paid <input type="checkbox"/> Y <input type="checkbox"/> N	Date
Fine	\$	Due	Paid <input type="checkbox"/> Y <input type="checkbox"/> N	Date
Assessment(s)	\$	Due	Paid <input type="checkbox"/> Y <input type="checkbox"/> N	Date
Restitution	\$	Due	Paid <input type="checkbox"/> Y <input type="checkbox"/> N	Date
Judgment	\$	Due	Paid <input type="checkbox"/> Y <input type="checkbox"/> N	Date
Satisfaction of Judgment Filed?		<input type="checkbox"/> Y <input type="checkbox"/> N		
No. of Victims:				

Comments: _____



State of Washington

DEPARTMENT OF FINANCIAL INSTITUTIONS

In The Matter of Investigating the Loan
Originator License Application under the
Mortgage Broker Practices Act Of
Washington by:

OAH Docket No. 2007-DFI-0010

DFI No. C-07-114-07-FO01

SYLVESTER ABRAHAM REEVES, JR.,

AMENDED
FINAL DECISION AND ORDER

Respondent.

THIS MATTER having come before SCOTT JARVIS, Director of the Washington State Department of Financial Institutions (hereinafter, "Department"), sitting as Presiding Officer, on the Department's Petition for Review (hereinafter, "Department's Petition") dated August 2, 2007, from the Initial Decision and Order (hereinafter, "Initial Order") dated July 13, 2007, of Administrative Law Judge Brian O. Watkins of the Office of Administrative Hearings (hereinafter, "ALJ"); and the Presiding Officer having fully considered the entire record on review, including, without limitation, all pleadings, testimony and recorded oral and written argument before the ALJ, together with the Initial Order, the Department's Petition, the Respondent's Response to the Department's Petition (hereinafter, "Respondent's Response"), and the Department's Reply to Respondent's Petition (hereinafter, "Department's Reply");

NOW, THEREFORE, the Presiding Officer issues the following Final Decision and Order:

1.0 CONSIDERATION

1.1 Notwithstanding Paragraph 1.1 of the Final Decision and Order dated March 18, 2008 (hereinafter, "Superseded Order"), the Presiding Officer now finds and confirms that the Department's Petition was filed and served upon the Department within twenty (20) days from date of service of the Initial Order, or August 2, 2007. Therefore, the Presiding Officer finds

1 and confirms that the Department's Petition is *timely* and that the Department's Petition, the
2 Respondent's Response and the Department's Reply must be considered.

3 1.2 In addition, the Presiding Officer has the authority and duty to consider whether the
4 Initial Order was appropriate based upon the entire record on review, independent of any
5 consideration of the Department's Petition, the Respondent's Response and the Department's
6 Reply must be considered.

7 1.3 The Presiding Officer agrees with and concurs in the Findings of Fact contained in the
8 Initial Order, with the *exception* of the following:

9
10 1.3.1 Finding of Fact No. 13 is hereby modified as follows:

11 "On December 27, 2000, the Pierce County Prosecutor filed an information,
12 charging the Appellant with four felonies: (1) Possessing Stolen Property in the
13 First Degree in violation of RCW 9A.56.140(1); (2) One count of False
14 Statements or illegal transfers in violation of RCW 46.12.210; (3) Another count
15 of False Statements or illegal transfers in violation of RCW 46.12.210; and (4)
16 Identity Theft in violation of RCW 9.35.020. The amended information did not
17 contain the word *felony* or *feloniously*."

18
19 1.3.2 Finding of Fact No. 19 is hereby modified as follows:

20 "I must consider carefully the evidence regarding whether the Appellant knew
21 or had reason to know that he had ever been charged with a felony. In
22 evaluating the evidence, I considered the demeanor and motivations of the
23 witnesses and the logical persuasiveness of the parties' positions. In entering
24 findings, I need not be persuaded beyond a reasonable doubt as to the true state
25 of affairs, nor must the persuasive evidence be clear, cogent, and convincing. I
26 need only determine what most likely happened. A preponderance of the
27 evidence is that evidence which, when fairly considered, produces the strongest
28 impression, has the greater weight, and is more convincing as to its truth when
29 weighed against the evidence in opposition to it. *Yamamoto v. Puget Sound*
30 *Lumber Co.*, 84 Wn. 411, 417, 146 P. 861 (1915). Significant at the hearing
31 were the Appellant's testimony and the criminal court pleadings. Either no one
32 informed Appellant that he had ever been charged with a felony or he only had a
33 recollection of the amended information, which did not mention the word felony
34 or feloniously. The uncontroverted testimony of Appellant is that he had an
appreciation only that he had been charged with a misdemeanor and that he
relied upon his defense attorney, who told him so. He was unsophisticated, had
no legal training, and had no other criminal charges. I find by the preponderance
of the evidence that the Appellant was not aware that he was charged with a
felony until the Department served him with the statement of charges in this
matter. I also find the Appellant's lack of knowledge and application responses
are reasonable under the circumstances."

1 1.4 After careful review of the record and with proper deference to the ALJ (who
2 heard the live testimony of Respondent with respect to his demeanor and perceived
3 credibility as a witness), the Presiding Officer hereby declines to modify Finding of Fact
4 No. 20 of the Initial Order.

5 1.5 The Presiding Officer agrees with and concurs in the Conclusions of Law
6 contained in the Initial Order, with the *exception* of the following:

7 1.5.1 Conclusion of Law No. 14 is hereby modified as follows:

8 "A preponderance of the evidence in this case indicates that under the
9 circumstances, including confusion between the original criminal
10 information and the amended criminal information and the nature of the
11 criminal charges as explained by his defense attorney, the Appellant made a
12 reasonable effort to be forthcoming in disclosing the nature of his criminal
13 conviction. He visited the Department to discuss it, disclosed his
14 conviction, charges and plea to the best of his knowledge and made it
15 known in his application that he would come in to the Department's offices
16 to discuss what he believed were the facts. Under the peculiar
17 circumstances presented, and in the absence of credible testimony or timely
18 argument to the contrary, the Presiding Officer concludes that the
19 Department has not met its burden of demonstrating 'negligence' by a
20 preponderance of the evidence."

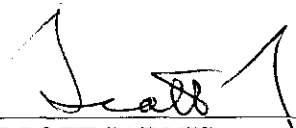
21 1.5.2 Conclusion of Law No. 16 is hereby modified as follows:

22 "The sole remaining issue is whether the Appellant negligently made a
23 false statement of material fact when he informed the Department that 'In
24 December 2000 i [sic] plead guilty' rather than listing the actual month of
25 his plea, which was April 2001, a difference of four months. His statement
26 in this regard was indeed a mistake. It is also true that, while the
27 Department later examined the Appellant's criminal background and
28 discovered the mistake, the Department is entitled to consider the
29 truthfulness and veracity of an applicant on his or her application when
30 determining his or her honesty and suitability for a loan originator license.
31 However, the Presiding Officer cannot conclude that such a mistake is
32 always material and always the product of negligence. Rather, the
33 Presiding Officer concludes that because this case presents enough
34 mitigating circumstances, as shown by the Findings of Fact and as
reflected in Conclusion of Law No. 14, the Department has failed to
demonstrate its burden of proof of 'negligence' by a preponderance of the
evidence."

1.5.3 Conclusion of Law No. 17 is hereby modified as follows:

1 2.4 While Respondent shall *not* after April 3, 2008 be automatically precluded under
2 RCW 19.146.310 from obtaining a loan originator's license, nothing in this Final
3 Decision and Order shall preclude the Department from evaluating, in any future
4 application of SYLVESTER ABRAHAM REEVES, JR., his criminal conviction on April
5 3, 2001, as a basis for his fitness for a loan originator license, subject, however, to the
6 requirements and limitations of Chapter 19.146 RCW and WAC 208-660.
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8 DATED: March 21, 2008
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12 SCOTT JARVIS
13 Director & Presiding Officer
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State of Washington

DEPARTMENT OF FINANCIAL INSTITUTIONS

In The Matter of Investigating the Loan
Originator License Application under the
Mortgage Broker Practices Act Of
Washington by:

OAH Docket No. 2007-DFI-0010

DFI No. C-07-114-07-FO01

SYLVESTER ABRAHAM REEVES, JR.,

FINAL DECISION AND ORDER

Respondent.

THIS MATTER having come before SCOTT JARVIS, Director of the Washington State Department of Financial Institutions (hereinafter, "Department"), sitting as Presiding Officer, on the Department's Petition for Review (hereinafter, "Department's Petition") dated August 2, 2007, from the Initial Decision and Order (hereinafter, "Initial Order") dated July 13, 2007, of Administrative Law Judge Brian O. Watkins of the Office of Administrative Hearings (hereinafter, "ALJ"); and the Presiding Officer having fully considered the entire record on review, including, without limitation, all pleadings, testimony and recorded oral and written argument before the ALJ, together with the Initial Order, the Department's Petition, the Respondent's Response to the Department's Petition (hereinafter, "Respondent's Response"), and the Department's Reply to Respondent's Petition (hereinafter, "Department's Reply");

NOW, THEREFORE, the Presiding Officer issues the following Final Decision and Order:

1.0 CONSIDERATION

1.1 The Initial Order contained a Notice of Further Appeal Rights, which clearly stated that "[t]he deadline to file a Petition for Review is August 2, 2007." There is a Certificate of Service appended to the Initial Order clearly showing that the Initial Order was served by mail upon the Department and its counsel of Record, Chad C. Standifer, Assistant Attorney General, on the same date of its entry, July 13, 2007. Moreover, the Department's file shows that the

1 Department actually received the Initial Order as of July 16, 2007. Pursuant to RCW
2 34.05.464 and WAC 10-08-211, the Department had twenty (20) days from date of service of
3 the Initial Order, or August 2, 2007, to file a petition for review (Department's Petition).
4 Pursuant to WAC 10-08-110(1)(a), filing of petitions for review with an agency are deemed
5 filed as of the date and time of actual filing. Therefore, it appearing that Department's Petition,
6 while dated August 2, 2007, was not actually filed until August 6, 2007, the Presiding Officer
7 has no choice but to conclude that it was untimely and must not consider it.

8
9 1.2 There being no timely petition for review, the Presiding Officer still has the authority
10 and duty to consider whether the Initial Order was appropriate based upon the entire record on
11 review, excluding Department's Petition.

12 1.3 The Presiding Officer agrees with and concurs in the Findings of Fact contained in the
13 Initial Order, with the *exception* of the following:

14 1.3.1 Finding of Fact No. 13 is hereby modified as follows:

15 "On December 27, 2000, the Pierce County Prosecutor filed an information,
16 charging the Appellant with four felonies: (1) Possessing Stolen Property in the
17 First Degree in violation of RCW 9A.56.140(1); (2) One count of False
18 Statements or illegal transfers in violation of RCW 46.12.210; (3) Another count
19 of False Statements or illegal transfers in violation of RCW 46.12.210; and (4)
20 Identity Theft in violation of RCW 9.35.020. The amended information did not
21 contain the word *felony* or *feloniously*."

22 1.3.2 Finding of Fact No. 19 is hereby modified as follows:

23 "I must consider carefully the evidence regarding whether the Appellant knew
24 or had reason to know that he had ever been charged with a felony. In
25 evaluating the evidence, I considered the demeanor and motivations of the
26 witnesses and the logical persuasiveness of the parties' positions. In entering
27 findings, I need not be persuaded beyond a reasonable doubt as to the true state
28 of affairs, nor must the persuasive evidence be clear, cogent, and convincing. I
29 need only determine what most likely happened. A preponderance of the
30 evidence is that evidence which, when fairly considered, produces the strongest
31 impression, has the greater weight, and is more convincing as to its truth when
32 weighed against the evidence in opposition to it. *Yamamoto v. Puget Sound*
33 *Lumber Co.*, 84 Wn. 411, 417, 146 P. 861 (1915). Significant at the hearing
34 were the Appellant's testimony and the criminal court pleadings. Either no one
informed Appellant that he had ever been charged with a felony or he only had a
recollection of the amended information, which did not mention the word felony
or feloniously. The uncontroverted testimony of Appellant is that he had an
appreciation only that he had been charged with a misdemeanor and that he
relied upon his defense attorney, who told him so. He was unsophisticated, had

1 no legal training, and had no other criminal charges. I find by the preponderance
2 of the evidence that the Appellant was not aware that he was charged with a
3 felony until the Department served him with the statement of charges in this
4 matter. I also find the Appellant's lack of knowledge and application responses
5 are reasonable under the circumstances."

6 1.4 After careful review of the record and with proper deference to the ALJ (who
7 heard the live testimony of Respondent with respect to his demeanor and perceived
8 credibility as a witness), and in the absence of a timely petition for review by the
9 Department, the Presiding Officer hereby declines to modify Finding of Fact No. 20 of the
10 Initial Order.

11 1.5 The Presiding Officer agrees with and concurs in the Conclusions of Law
12 contained in the Initial Order, with the *exception* of the following:

13 1.5.1 Conclusion of Law No. 14 is hereby modified as follows:

14 "A preponderance of the evidence in this case indicates that under the
15 circumstances, including confusion between the original criminal
16 information and the amended criminal information and the nature of the
17 criminal charges as explained by his defense attorney, the Appellant made a
18 reasonable effort to be forthcoming in disclosing the nature of his criminal
19 conviction. He visited the Department to discuss it, disclosed his
20 conviction, charges and plea to the best of his knowledge and made it
21 known in his application that he would come in to the Department's offices
22 to discuss what he believed were the facts. Under the peculiar
23 circumstances presented, and in the absence of credible testimony or timely
24 argument to the contrary, the Presiding Officer concludes that the
25 Department has not met its burden of demonstrating 'negligence' by a
26 preponderance of the evidence."

27 1.5.2 Conclusion of Law No. 16 is hereby modified as follows:

28 "The sole remaining issue is whether the Appellant negligently made a
29 false statement of material fact when he informed the Department that 'In
30 December 2000 i [sic] plead guilty' rather than listing the actual month of
31 his plea, which was April 2001, a difference of four months. His statement
32 in this regard was indeed a mistake. It is also true that, while the
33 Department later examined the Appellant's criminal background and
34 discovered the mistake, the Department is entitled to consider the
truthfulness and veracity of an applicant on his or her application when
determining his or her honesty and suitability for a loan originator license.
However, the Presiding Officer cannot conclude that such a mistake is
always material and always the product of negligence. Rather, the
Presiding Officer concludes that because this case presents enough

1 mitigating circumstances, as shown by the Findings of Fact and as
2 reflected in Conclusion of Law No. 14, the Department has failed to
3 demonstrate its burden of proof of 'negligence' by a preponderance of the
4 evidence."

5 1.5.3 Conclusion of Law No. 17 is hereby modified as follows:

6 "Accordingly, the Appellant did not negligently make any false statement
7 or knowingly and willfully make any omission of material fact in
8 connection with his application. Appellant therefore should not be barred
9 from working in the mortgage industry in any capacity for a period of five
10 years."

11 1.6 The Presiding Officer further generally concurs with the ALJ, as the latter
12 articulated in Conclusion of Law No. 18 of the Initial Order, that administrative law
13 judges lack authority to invalidate legislation and agency regulations. For the same
14 reason, this Presiding Officer lacks authority to officially consider the constitutionality of
15 laws enacted by the Legislature with the express requirement that they be administered by
16 the Department, or to invalidate prior rulemaking without complying with the rulemaking
17 requirements of Chapter 34.05 RCW. Accordingly, the Presiding Officer must decline to
18 consider assertions of unconstitutionality raised by Respondent at trial and in
19 Respondent's Response.

20 21 2.0 FINAL DECISION AND ORDER

22 For all of the reasons set forth above, IT IS HEREBY ORDERED THAT:

23 2.1 The Findings of Fact and Conclusions of Law as set forth in the Initial Order are
24 confirmed except as set forth above in Subsections 1.3, 1.4 and 1.5, inclusive.

25 2.2 Pursuant to RCW 19.146.310, the application of SYLVESTER ABRAHAM
26 REEVES, JR., for a loan originator's license with the Department of Financial Institutions
27 is DENIED, and the Department has authority to and shall deny any loan originator's
28 application he files up to and including APRIL 3, 2008.

29 2.3 SYLVESTER ABRAHAM REEVES, JR. may not work as a loan originator in
30 Washington unless the Department licenses him to do so after a future license application
31 made after April 3, 2008. Nothing in this Final Decision and Order shall prohibit
32 SYLVESTER ABRAHAM REEVES, JR. from working in a capacity for a licensed
33 mortgage broker that does not require a license with the Department.
34

1 2.4 While Respondent shall *not* after April 3, 2008 be automatically precluded under
2 RCW 19.146.310 from obtaining a loan originator's license, nothing in this Final
3 Decision and Order shall preclude the Department from evaluating, in any future
4 application of SYLVESTER ABRAHAM REEVES, JR., his criminal conviction on April
5 3, 2001, as a basis for his fitness for a loan originator license, subject, however, to the
6 requirements and limitations of Chapter 19.146 RCW and WAC 208-660.
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8 DATED: March 18, 2008
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12 SCOTT JARVIS
13 Director & Presiding Officer
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**STATE OF WASHINGTON
DEPARTMENT OF FINANCIAL INSTITUTIONS
DIVISION OF CONSUMER SERVICES**

IN THE MATTER OF INVESTIGATING
the Loan Originator License Application under the
Mortgage Broker Practices Act of Washington by:

SYLVESTER ABRAHAM REEVES, JR.,

Respondent.

NO. C-07-114-07-SC01

STATEMENT OF CHARGES and
NOTICE OF INTENTION TO ENTER
AN ORDER TO DENY LICENSE APPLICATION
AND PROHIBIT FROM INDUSTRY

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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)¹. After having conducted an investigation pursuant to RCW 19.146.310, 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 Respondent Sylvester Abraham Reeves, Jr. (Respondent Reeves) submitted an application to the Department of Financial Institutions of the State of Washington (Department) for a loan originator license under Gollehon Unlimited Inc. dba Home Sweet Home Lending, a mortgage broker licensed under the Act. The on-line application was received by the Department on or about December 26, 2006.

1.2 Prior Criminal Acts. On December 27, 2000 Respondent Reeves was charged in Superior Court for the County of Pierce in Cause No. 00-1-06214-3 with the following: (a) Possessing Stolen Property in the First Degree in violation of RCW 9A.56.140(1) and RCW 9A.56.150, a felony; (b) two counts of False Statements or Illegal Transfers in violation of RCW 46.12.210, both felonies; and (c) Identity Theft in violation of RCW 9.35.020, a felony. On April 3, 2001, Respondent Reeves entered a plea of guilty to one count of Attempted

¹ RCW 19.146 (Amended 2006; Effective January 1, 2007)

1 False Statements or Illegal Transfers, as amended, a gross misdemeanor pursuant to RCW 46.12.210 and
2 9A.28.020.

3 **1.3 Responses to Application Questions.** The “Criminal Disclosure” section of the loan originator license
4 application consists of eight questions, and includes the following instruction:

5 “If the answer to any of the following is “YES”, provide complete details of all events or proceedings”

6 Respondent Reeves answered “no” to the following question on the “Criminal Disclosure” section of his loan
7 originator license application:

- 8 • 1-Have you ever been charged with a felony?

9 Respondent Reeves answered as follows to the following question in the “Criminal Disclosure” section of the
10 loan originator license application:

- 11 • 5-Have you ever been convicted of or plead guilty or nolo contendere (“no contest”) in a
12 domestic, foreign, or military court to misdemeanor involving: financial services or a financial
13 services-related business or any fraud, false statements or omissions, theft or any wrongful taking
14 of property, bribery, perjury, forgery, counterfeiting, extortion, or a conspiracy to commit any of
15 these offenses? Respondent Reeves response was: “in December 2000 I plead guilty to (attempted
16 false statements or illegal transfers). An x-friend took a id of mine and registered a car with stolen
17 parts on it. He got charged with having stolen property and I pled guilty to attempted false
18 statements or illegal transfers because of the car.”

19 Respondent Reeves was obligated by statute to answer questions on the loan originator license application
20 truthfully and to provide the Department with complete details of all events or proceedings.

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

22 **2.1 Requirement of No Prior Convictions.** Based on the Factual Allegations set forth in Section I above,
23 Respondent Reeves fails to meet the requirements of RCW 19.146.310(1)(d) and WAC 208-660-350(2)(c) by
24 having been convicted of a gross misdemeanor involving dishonesty or financial misconduct or a felony within
25 seven years of the filing of the present application.

1 **2.2 Requirement to Provide Information on License Application.** Based on the Factual Allegations set
2 forth in Section I above, Respondent Reeves fails to meet the requirements of RCW 19.146.300(1) and (2) and
3 RCW 19.146.310(1)(b) by failing to provide an accurate and complete license application in the form
4 prescribed by the Director.

5 **2.3 Requirement to Demonstrate Character and General Fitness.** Based on the Factual Allegations set
6 forth in Section I above, Respondent Reeves fails to meet the requirements of RCW 19.146.310(1)(g) and
7 WAC 208-660-350(2)(a) by failing to demonstrate character and general fitness such as to command the
8 confidence of the community and to warrant a belief that the business will be operated honestly and fairly
9 within the purposes of the Act.

10 **III. AUTHORITY TO IMPOSE SANCTIONS**

11 **3.1 Authority to Deny Application for Loan Originator License.** Pursuant to RCW 19.146.220(1), the
12 Director may deny licenses to loan originators. Pursuant to RCW 19.146.310(2) and WAC 208-660-350(7), the
13 Director shall not issue a loan originator license if the conditions of RCW 19.146.310(1) have not been met by
14 the applicant, and shall notify the loan originator applicant and any mortgage brokers listed on the application
15 of the denial.

16 **3.2 Authority to Prohibit from Industry.** Pursuant to RCW 19.146.220(5)(a), the Director may issue
17 orders removing from office or prohibiting from participation in the conduct of the affairs of a licensed
18 mortgage broker, or both, any officer, principal, employee, or loan originator of any licensed mortgage broker
19 or any person subject to licensing under the Act for any violation of RCW 19.146.0201(1) through (9).

20 **IV. NOTICE OF INTENTION TO ENTER ORDER**

21 Respondent's violations of the provisions of chapter 19.146 RCW and chapter 208-660 WAC, as set forth
22 in the above Factual Allegations, Grounds for Entry of Order, and Authority to Impose Sanctions, constitute a basis
23 for the entry of an Order under RCW 19.146.220, RCW 19.146.221, RCW 19.146.223 and RCW 19.146.310.

24 Therefore, it is the Director's intention to ORDER that:


25 **4.1** Respondent Sylvester Abraham Reeves, Jr.'s application for a loan originator license be denied.

1 4.2 Respondent Sylvester Abraham Reeves, Jr. be prohibited from participation in the conduct of the affairs
2 of any licensed mortgage broker, in any manner, through December 26, 2013.

3 **V. AUTHORITY AND PROCEDURE**

4 This Statement of Charges and Notice of Intention to Enter an Order to Deny License Application and
5 Prohibit from Industry (Statement of Charges) is entered pursuant to the provisions of RCW 19.146.220,
6 RCW 19.146.221, RCW 19.146.223 and RCW 19.146.230, and is subject to the provisions of chapter 34.05
7 RCW (The Administrative Procedure Act). Respondent may make a written request for a hearing as set forth in
8 the NOTICE OF OPPORTUNITY TO DEFEND AND OPPORTUNITY FOR HEARING accompanying this
9 Statement of Charges.


10 Dated this 17th day of April, 2007

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12 _____
13 DEBORAH BORTNER
14 Director
15 Division of Consumer Services
16 Department of Financial Institutions

17 Presented by:

18 
19 _____
20 FATIMA BATIE
21 Financial Legal Examiner Supervisor

22 Approved by:

23 
24 _____
25 JAMES R. BRUSSELBACK
Enforcement Chief

