

Terms Completed

CONSENT ORDER SUMMARY – Case Number: C-07-231-11-CO01

Name(s): Geneva Roth Ventures, Inc. d/b/a www.loanpointusa.com

Order Number: C-07-231-11-CO01

Effective Date: 8/18/11

License Number: NA
(Revoked, suspended, stayed, application denied or withdrawn)
 If applicable, you must specifically note the ending dates of terms.

License Effect: NA

Not Apply Until: NA

Prohibition/Ban Until: NA

Investigation Costs	\$5,500	Due NOW	Paid YES	Date 7/20/11
Fine	\$117,300	Due NOW	Paid YES	Date 7/20/11
Assessment(s)	\$	Due	Paid Y N	Date
Restitution	\$4,141	Due NOW	Paid YES	Date 7/20/11
	No. of Victims:	4		

Other: Respondent shall not conduct small loan or consumer loan business with WA residents and any such loans made to WA residents from 1/1/06 through the date of the CO are not enforceable or collectable
Conduct giving rise to the SOC shall not be used in assessing future license applications

Special Instructions: Respondent is not licensed, therefore licensing unit doesn't need notification

Distribution: Original to Enforcement File
 Copy to Licensing Supervisor with Licensing File and copy of Consent Order
 Information to Database(s) – Branch, Individual, Contact Person

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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
Check Cashers and Sellers Act of Washington or
the Consumer Loan Act of Washington by:

GENEVA ROTH VENTURES, INC. d/b/a
WWW.LOANPOINTUSA.COM, and MARK
CURRY, Owner and President,

Respondents.

NO. C-07-231-11-CO01

CONSENT ORDER FOR GENEVA ROTH
VENTURES, INC. d/b/a
WWW.LOANPOINTUSA.COM

COMES NOW the Director of the Department of Financial Institutions (Director), through his designee Deborah Bortner, Division Director, Division of Consumer Services, and Geneva Roth Ventures Inc. d/b/a www.loanpointusa.com (Respondent), by and through its attorney, John L. Bley, 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 chapters 31.45 RCW, the Check Cashers and Sellers Act, RCW 31.04, the Consumer Loan Act; 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 Respondent have agreed upon a basis for resolution of the matters alleged in Statement of Charges No. C-07-231-10-SC01 (Statement of Charges), entered February 12, 2010, (copy attached hereto). Pursuant to chapter 31.45 RCW, the Check Cashers and Sellers Act and 31.04 RCW, the Consumer Loan Act, and RCW 34.05.060 of the Administrative Procedure Act, Respondent hereby agrees to the Department's entry of this Consent Order and further agrees that the issues raised in the above-captioned matter may be economically and efficiently settled by entry of this Consent Order. Respondent is agreeing not to contest the Statement of Charges in consideration of the terms of this Consent Order.

Based upon the foregoing:

CONSENT ORDER
C-07-231-11-CO01
GENEVA ROTH VENTURES, INC. d/b/a
WWW.LOANPOINTUSA.COM

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

1 **A. Jurisdiction.** Respondent consents to the jurisdiction of the Department to enter this Consent Order,
2 as well as the jurisdiction of the Department and Washington State courts to the extent required for the
3 Department to enforce all terms contained in this Consent Order, including but not limited to this provision. The
4 limited consent provided herein may not be construed as a waiver or consent to jurisdiction for any other
5 purpose as to the Respondent.

6 **B. Waiver of Hearing.** It is AGREED that Respondent has been informed of the right to a hearing
7 before an administrative law judge, and hereby waives its right to a hearing and any and all administrative and
8 judicial review of the issues raised in this matter, or of the resolution reached herein. Accordingly, Respondent,
9 by the signatures of its representatives below, withdraws its appeal to the Office of Administrative Hearings.

10 **C. No Admission of Liability.** The parties intend this Consent Order to fully resolve the Statement of
11 Charges and agree that Respondent neither admits nor denies any of the allegations contained in the Statement of
12 Charges.

13 **D. Fine.** It is AGREED that Respondent shall pay to the Department a fine of \$117,300, in the form of a
14 cashier's check made payable to the "Washington State Treasurer," upon entry of this Consent Order.

15 **E. Agreement to Not Conduct Business with Washington Individuals or Washington Residents.**
16 It is AGREED Respondent shall not conduct the business of a Check Casher or Check Seller with a small loan
17 endorsement and not conduct the business of a Consumer loan company with respect to any individual located
18 in the state of Washington or individual asserting Washington residency. Respondent agrees that this provision
19 precludes it from making small loans or consumer loans to any individual located in the state of Washington or
20 individual asserting Washington residency. Respondent further agrees that any loans it has previously made to
21 any individual located in the state of Washington at the time the loan was made or asserting Washington
22 residency during the period of January 1, 2006 through the entry of the Consent Order are not enforceable or
23 collectable. Respondent further agrees that it will not collect or attempt to collect outstanding loans that have
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1 been made to any individual located in the state of Washington at the time the loan was made or individual
2 asserting Washington residency during the period of January 1, 2006 through the entry of the Consent Order.

3 **F. Refunds to Washington Borrowers:** It is AGREED that Respondent has represented to the
4 Department that certain fees collected by Respondent with respect to the borrowers discussed in the Statement
5 of Charges have been refunded.

6 **G. Investigation Fee.** It is AGREED that Respondent shall pay to the Department an investigation fee
7 of \$5,500, in the form of a cashier's check made payable to the "Washington State Treasurer," upon entry of this
8 Consent Order. The Fine and Investigation Fee may be paid together in one cashier's check made payable to the
9 "Washington State Treasurer" in the amount of \$122,800.

10 **H. Future Application.** It is AGREED the conduct giving rise to the Statement of Charges will not
11 be used by the Department in assessing a future license application by the Respondent.

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

14 **J. Non-Compliance with Order.** It is AGREED that Respondent understands that failure to abide
15 by the terms and conditions of this Consent Order may result in further legal action by the Director. In the
16 event of such legal action, Respondent may be responsible to reimburse the Director for the cost incurred in
17 pursuing such action, including but not limited to, attorney fees.

18 **K. Voluntarily Entered.** It is AGREED that the undersigned Respondent has voluntarily entered into
19 this Consent Order, which is effective when signed by the Director's designee.

20 **L. Completely Read, Understood, and Agreed.** It is AGREED that Respondent has read this Consent
21 Order in its entirety and fully understands and agrees to all of the same.

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1 **RESPONDENT:**

2 **Geneva Roth Ventures Inc. d/b/a www.loanpointusa.com**

3 By:

4 [Redacted]

5 Mark Curry
Owner and President

6/17/11

Date

6 [Redacted]

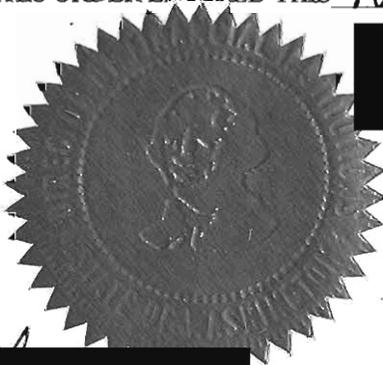
7 John L. Bley, WSBA No. 15230
Attorney at Law, Foster Pepper PLLC
8 Attorney for Respondent

6/17/11

Date

9 DO NOT WRITE BELOW THIS LINE

10 THIS ORDER ENTERED THIS 18th DAY OF August, 2011.



11 [Redacted]

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

16 Presented by:

17 [Redacted]

18 MARK OLSON
19 Financial Legal Examiner

20 Approved by:

21 [Redacted]

22 JAMES R. BRUSSELBACK
23 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
Check Cashers and Sellers Act of Washington or
the Consumer Loan Act of Washington by:

GENEVA ROTH VENTURES, INC. d/b/a
WWW.LOANPOINTUSA.COM, and MARK
CURRY, Owner and President,

Respondents.

NO. C-07-231-10-SC01

STATEMENT OF CHARGES and NOTICE OF
INTENTION TO ENTER AN ORDER TO CEASE
AND DESIST, BAN FROM INDUSTRY, PROHIBIT
FROM INDUSTRY, IMPOSE FINE, ORDER
RESTITUTION, TAKE AFFIRMATIVE ACTION,
AND COLLECT INVESTIGATION FEE

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INTRODUCTION

Pursuant to RCW 31.45.110, RCW 31.45.200, RCW 31.04.093, and RCW 31.04.165, the Director of the Department of Financial Institutions of the State of Washington (Director) is responsible for the administration of chapters 31.45 RCW, the Check Cashers and Sellers Act and RCW 31.04, the Consumer Loan Act (collectively referred to as the Acts). After having conducted an investigation pursuant to RCW 31.45.100 and RCW 31.04.145, and based upon the facts available as of the date of this Statement of Charges, the Director institutes this proceeding and finds as follows:

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I. FACTUAL ALLEGATIONS

1.1 Respondents.

A. Geneva Roth Ventures, Inc. d/b/a www.loanpointusa.com (Respondent Geneva) has never applied for a license with the Department. Respondent Geneva is not registered with the Washington State Secretary of State or the Washington State Department of Revenue.

B. Mark Curry (Respondent Curry) is the owner and President of Geneva Roth Ventures, Inc. d/b/a www.loanpointusa.com.

1.2 Unlicensed Activity. For at least the period beginning on or about November 1, 2006, through December 31, 2008, Respondents have conducted business by providing loans to at least 10 consumers in Washington State from the internet website www.loanpointusa.com, without being licensed by the Department.

1 **1.3 Unlicensed Location.** The Respondents have been operating the website www.loanpointusa.com from
2 a location that is not licensed with the Department.

3 **1.4 Failure to Obtain and Maintain A License¹.**

4 **A. Check Casher License and Check Seller License with a Small Loan Endorsement.** To date,
5 the Department has not issued a license to the Respondents to conduct the business of a check casher or check
6 seller with a small loan endorsement.

7 **B. Consumer Loan License.** To date, the Department has not issued a license to the Respondents
8 to conduct the business of a consumer loan company.

9 **1.5 Unauthorized Making of Loans.** Respondents have engaged in the business of making at least 10
10 loans from the website listed in paragraph 1.2, from at least November 1, 2006, through December 31, 2008.

11 **1.6 Unauthorized Advertisements.** Respondents advertised on their website www.loanpointusa.com their
12 ability to make loans to Washington consumers when they were not licensed to make loans beginning on or
13 about November 1, 2006, through December 9, 2008.

14 **1.7 Failure to Comply with Department's Investigation Authority.**

15 **A. Complaint 21952.** On February 14, 2007, the Department received a consumer complaint
16 involving Respondent Geneva. On May 1, 2007, the Department issued a subpoena², Agreement to Cease
17 and Desist, and a Claim of Non-Applicability of Check Cashers and Sellers Act, to Respondent Geneva. The
18 subpoena commanded Respondent Geneva to provide a list of all small loans (including the name, address,
19 and telephone number of each Washington State customer, the dollar amount and date of the transaction, and
20 any fee(s) charged for each transaction) made by Respondent Geneva to customers in the State of Washington
21 during the period from January 1, 2006, through the present. The documents sent to Respondent Geneva
22 were delivered via FedEx on May 7, 2007. The response from Respondent Geneva was due within 15 days.
23 On May 16, 2007, the Department received a fax from Respondent Geneva's attorney outlining its position

24 ¹ The business conducted by Respondents requires licensure under chapter 31.45 RCW. Respondents deny this
25 determination and claim chapter 31.45 RCW does not apply to them. In the alternative, therefore, Respondents' business
requires licensure under chapter 31.04 RCW.

² Unless otherwise noted, all subpoenas discussed were issued pursuant to RCW 31.45, the Check Cashers and Sellers Act.

1 that Respondent Geneva was not engaged in the payday loan business in Washington State and is not subject
2 to the Department's jurisdiction. Respondent Geneva did not comply with the subpoena or return the
3 Agreement to Cease and Desist or the Claim of Non-Applicability. On June 15, 2007, the Department sent a
4 second subpoena commanding Respondent Geneva to comply with the original packet sent on May 1, 2007.
5 The second subpoena was delivered to Respondent Geneva via FedEx on June 18, 2007. Respondent
6 Geneva's attorney responded to the subpoena via a letter on June 29, 2007, stating, among other things, that
7 "Geneva-Roth will not comply with your request for production, because we do not believe that you possess
8 the jurisdictional authority to issue an extraterritorial subpoena." Respondents did not comply with either
9 subpoena issued to Respondent Geneva involving complaint 21952.

10 **B. Complaint 27978.** On August 29, 2008, the Department received another consumer complaint
11 involving Respondent Geneva. On September 5, 2008, the Department issued a subpoena, Agreement to
12 Cease and Desist, and a Claim of Non-Applicability of Check Cashers and Sellers Act, to Respondent
13 Geneva. The subpoena commanded Respondent Geneva to provide a list of all small loans (including the
14 name address, and telephone number of each Washington State customer, the dollar amount and date of the
15 transaction, and any fee(s) charged for each transaction) made by Respondent Geneva for customers in the
16 State of Washington during the period from January 1, 2008, through the present. The documents sent to
17 Respondent Geneva were delivered via FedEx on September 8, 2008. The response from Respondent Geneva
18 was due within 15 days. On September 18, 2008, the Department received a fax from Respondent Geneva's
19 attorney outlining its position that Respondent Geneva was not engaged in the payday business in Washington
20 State and is not subject to the Department's jurisdiction. Respondent Geneva did not comply with the
21 subpoena or return the Agreement to Cease and Desist or the Claim of Non-Applicability.

22 **C. Investigation C-07-231.** On December 3, 2008, the Department issued a fourth subpoena and
23 Agreement to Cease and Desist to Respondent Geneva, which was delivered on December 4, 2008.
24 Respondent Geneva had 15 days to respond to the subpoena, but that date was extended, by agreement, to
25 January 9, 2009. On December 22, 2008, Respondent Geneva's attorney informed the Department that it had

1 ceased lending to Washington residents as of December 9, 2008. Respondent Geneva did not comply with
2 the December 3, 2008, subpoena or return a signed Agreement to Cease and Desist.

3 On January 29, 2009, the Department issued another subpoena and Agreement to Cease and Desist to
4 Respondent Geneva. The documents were delivered on January 30, 2009. The subpoena commanded
5 Respondent Geneva provide the Department with, among other things, a list of all borrowers located in
6 Washington State from July 22, 2007, through the date of the subpoena. Respondent Geneva had 15 days to
7 respond to the subpoena, but that date was extended, by agreement, to April 2, 2009. Respondent Geneva
8 provided very limited information to the Department in response to the January 29, 2009, subpoena, but did not
9 provide any documents to the Department or return a signed Agreement to Cease and Desist.

10 On July 29, 2009, the Department issued another subpoena and Agreement to Cease and Desist to
11 Respondent Geneva. The documents were delivered on July 31, 2009. The subpoena commanded Respondent
12 Geneva provide the Department with, among other things, a list of all borrowers located in Washington State
13 from July 22, 2007, through the date of the subpoena. Respondent Geneva did not comply with the July 29,
14 2009, subpoena or return a signed Agreement to Cease and Desist.

15 On November 16, 2009, the Department issued 2 additional subpoenas to Respondent Geneva. The
16 subpoenas were delivered via email on November 16, 2009, and First-Class mail on or about November 18,
17 2009. One of the subpoenas was issued pursuant to chapter 31.45 RCW, the Check Cashers and Sellers Act, and
18 the other was issued pursuant to chapter 31.04 RCW, the Consumer Loan Act. Both subpoenas commanded
19 Respondent Geneva provide, among other things, a list of all borrowers located in the State of Washington
20 during the period July 22, 2007, through the date of the letter. The deadline to respond to the subpoenas was
21 December 2, 2009. As of the date of this Statement of Charges, Respondent Geneva has failed to comply with
22 the subpoenas issued by the Department.

23 **1.8 Failure to Obtain and Maintain Bond.** The Respondents did not obtain and maintain bonds as
24 required by the Acts.

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1 **1.9 On-Going Investigation.** The Department's investigation into the alleged violations of the Acts by
2 Respondents continues to date.

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

4 **2.1 Definition of Licensee.** Pursuant to RCW 31.45.010(12), a "Licensee" is defined as a check casher or
5 seller licensed by the director to engage in business in accordance with the Act. For the purpose of the
6 enforcement powers of the Act, including the power to issue cease and desist orders under RCW 31.45.110,
7 "licensee" also means a check casher or seller who fails to obtain the license required by the Act.

8 **2.2 Definition of Small Loan.** Pursuant to RCW 31.45.010(19), a "Small Loan" is defined as a loan up to
9 the maximum amount and for a period of time up to the maximum term specified in RCW 31.45.073.

10 **2.3 Requirement to Obtain a License.**

11 A. **Check Casher and Seller License.** Based on the Factual Allegations set forth in Section I
12 above, Respondents are in apparent violation of RCW 31.45.030(1) for engaging in the business of a check
13 casher and seller without first obtaining a license from the Director.

14 B. **Consumer Loan License.** Based on the Factual Allegations set forth in Section I above,
15 Respondents are in apparent violation of RCW 31.04.035 for engaging in the business of a consumer loan
16 company without first obtaining a license from the Director.

17 **2.4 Requirement to Obtain a Small Loan Endorsement.** Based on the Factual Allegations set forth in
18 Section I above, Respondents are in apparent violation of RCW 31.45.070 and RCW 31.45.073 for engaging in
19 the business of making small loans without first obtaining a small loan endorsement from the Director.

20 **2.5 Requirement to Comply with Department's Investigation.** Based on the Factual Allegations set
21 forth in Section I above, Respondents are in apparent violation of RCW 31.45.100 or RCW 31.04.145 for
22 failing to comply with the director's investigative authority.

23 **2.6 Requirement to Maintain Surety Bond.** Based on the Factual Allegations set forth in Section I
24 above, Respondents are in apparent violation of RCW 31.45.030(5) and WAC 208-630-030 or RCW

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1 31.04.045 and WAC 208-620-320, for failing to maintain a surety bond or approved alternative with the
2 Department.

3 **2.7 Prohibited Acts.**

4 **A. Check Casher and Seller Act.** Based on the Factual Allegations set forth in Section I above,
5 Respondents are in apparent violation of RCW 31.45.110 (1)(a), (b), (j), and (l) and RCW 31.45.105(1)(a), (b),
6 (c), and (d) for engaging or having engaged in an unsafe or unsound financial practice in conducting the
7 business of a check seller governed by this Act, for violating or having violated the Act, for failing, upon
8 demand by the director or the director's designee, to disclose any information within his or her knowledge to,
9 or to produce any document, book, or record in his or her possession for inspection of, the director or director's
10 designee, for committing an act or engaging in conduct that demonstrates incompetence or trustworthiness, or
11 is a source of injury and loss to the public, for directly or indirectly employing any scheme, device, or artifice
12 to defraud or mislead any borrower, to defraud or mislead any lender, or to defraud or mislead any person, for
13 directly or indirectly engaging in any unfair or deceptive practice toward any person, for directly or indirectly
14 obtaining property by fraud or misrepresentation, and for making any small loan to any person physically
15 located in Washington through use of the internet, facsimile, telephone, kiosk, or other means without first
16 obtaining a small loan endorsement.

17 **B. Consumer Loan Act.** Based on the Factual Allegations set forth in Section I above,
18 Respondents are in apparent violation of RCW 31.04.027(1), (2), (3), (6), (7) for directly or indirectly
19 employing a scheme, device, or artifice to defraud or mislead any borrower or any other person, for directly or
20 indirectly engaging in any unfair or deceptive practice toward any person, for directly or indirectly obtaining
21 property by fraud or misrepresentation, and for failing to disclose to loan applicants as required by RCW
22 31.04.102 and any other applicable state or federal law.

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1 **III. AUTHORITY TO IMPOSE SANCTIONS**

2 **3.1 Authority to Issue Orders.**

3 **A. Check Cashers and Sellers Act.** Pursuant to RCW 31.45.110(2) the Director may order a
4 licensee to cease and desist from practices in violation of the Act or to take such affirmative action as is necessary
5 to comply with the Act.

6 **B. Consumer Loan Act.** Pursuant to RCW 31.04.093(5)(a) and (b), the Director may order a
7 person subject to the Act to cease and desist from conducting business in a manner that is injurious to the public or
8 violates any provision of the Act, or to take such affirmative action as is necessary to comply with the Act.

9 **3.2 Authority to Ban from the Industry.** Pursuant to RCW 31.45.110(2)(e), the Director may remove
10 from office or ban from participation in the conduct of the affairs of any licensee any director, officer, sole
11 proprietor, partner, controlling person, or employee of a licensee that is violating or has violated the Act
12 including rules and orders, or commits any act or engages in conduct that demonstrates incompetence or
13 untrustworthiness, or is a source of injury or loss to the public.

14 **3.3 Authority to Prohibit from the Industry.** Pursuant to RCW 31.04.093(6), the Director may remove
15 from office or prohibit from the participation in the affairs of any licensee, officer, principal, employee or loan
16 originator, or any person subject to the Act for failing to comply with any order or subpoena issued under the Act,
17 or any violation of RCW 31.04.027.

18 **3.4 Authority to Impose Fine.**

19 **A. Check Cashers and Sellers Act.** Pursuant to RCW 31.45.110(2)(c), the Director may impose a
20 fine, not to exceed one hundred dollars per day for each day's violation of the Act, on any licensee or applicant,
21 or any director, officer, sole proprietor, partner, controlling person, or employee of a licensee or applicant, that
22 is violating or has violated the Act including rules and orders, or commits any act or engages in conduct that
23 demonstrates incompetence or untrustworthiness, or is a source of injury or loss to the public.

- 1 **4.5** Respondent Mark Curry be banned from participation in the conduct of the affairs of any check casher or
2 check casher with a small loan endorsement or check seller subject to licensure by the Director, in any
3 manner, for a period of 5 years;
- 3 **4.6** Respondent Mark Curry be prohibited from participation in the conduct of the affairs of any consumer loan
4 company subject to licensure by the Director, in any manner, for a period of 5 years;
- 4 **4.7** Respondents Geneva Roth Ventures, Inc. d/b/a www.loanpointusa.com and Mark Curry jointly and
5 severally pay a fine which, as of the date of this document, totals \$117,300;
- 6 **4.8** Respondents Geneva Roth Ventures, Inc. d/b/a www.loanpointusa.com and Mark Curry jointly and
7 severally pay restitution for all loans made by Respondents to borrowers located in Washington State from
8 at least January 1, 2006, through December 31, 2009;
- 8 **4.9** Respondents Geneva Roth Ventures, Inc. d/b/a www.loanpointusa.com and Mark Curry provide the
9 Department with a list of all loans the Respondents made to Washington residents from at least January 1,
10 2006, through December 31, 2009;
- 10 **4.10** Respondents Geneva Roth Ventures, Inc. d/b/a www.loanpointusa.com and Mark Curry jointly and
11 severally pay an investigation fee, which as of the date of this document, totals \$4,140, calculated at \$69 per
12 hour or totals \$4,140.60, calculated at \$69.01 per hour for the 60 staff hours devoted to the investigation.

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1 **IV. AUTHORITY AND PROCEDURE**

2 This Statement of Charges and Notice of Intention to Enter an Order to Cease and Desist, Ban From
3 Industry, Prohibit from Industry, Impose Fine, Order Restitution, Take Affirmative Action, and Collect
4 Investigation Fee (Statement of Charges) is entered pursuant to the provisions of RCW 31.45.110 and
5 RCW 31.45.200 or RCW 31.04.093 and RCW 31.04.205, and is subject to the provisions of chapter 34.05
6 RCW (The Administrative Procedure Act). Respondents may make a written request for a hearing as set forth
7 in the NOTICE OF OPPORTUNITY TO DEFEND AND OPPORTUNITY FOR HEARING accompanying
8 this Statement of Charges.

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10 Dated this 12th day of February, 2010.

11 [Redacted Signature]

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

17 Presented by:

18 [Redacted Signature]

19 WILLIAM HALSTEAD
20 Financial Legal Examiner



21 Approved by:

22 [Redacted Signature]

23 JAMES R. BRUSSELBACK
24 Enforcement Chief