

## ORDER SUMMARY – Case Number: C-13-1176

**Name(s):** Interstate Law Group a/k/a Accredited Law Group; Richard C Sipan

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**Order Number:** C-13-1176-13-CO01

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**Effective Date:** March 19, 2014

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**License Number:** Unlicensed  
**Or NMLS Identifier [U/L]** (Revoked, suspended, stayed, application denied or withdrawn)  
 If applicable, you must specifically note the ending dates of terms.

**License Effect:** n/a

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**Not Apply Until:** 3/19/2019

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**Not Eligible Until:** 3/19/2019

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**Prohibition/Ban Until:** 3/19/2019

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<b>Investigation Costs</b>	\$715.20	Due See below	Paid <input type="checkbox"/> Y <input checked="" type="checkbox"/> N	Date
<b>Fine</b>	\$1,500	Due See below	Paid <input type="checkbox"/> Y <input checked="" type="checkbox"/> N	Date
<b>Assessment(s)</b>	\$	Due	Paid <input type="checkbox"/> Y <input type="checkbox"/> N	Date
<b>Restitution</b>	\$2,600	Due	Paid <input checked="" type="checkbox"/> Y <input type="checkbox"/> N	Date
<b>Judgment</b>	\$	Due	Paid <input type="checkbox"/> Y <input type="checkbox"/> N	Date
<b>Satisfaction of Judgment Filed?</b>		<input type="checkbox"/> Y <input type="checkbox"/> N		
No. of Victims:				

Comments: Respondents have AGREED that upon entry of this Consent Order Respondents will commence making payments in the amount of \$200 per month until paid in full. Additionally, Respondents signed a Confession of Judgment.

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

8           **C. Cease and Desist.** It is AGEED that Respondents will cease and desist from engaging in  
9 the business of a mortgage broker or loan originator in the State of Washington.

10           **D. Prohibition from Industry.** It is AGREED that, for a period of five years from the date  
11 of entry of this Consent Order, Respondents are prohibited from participating, in any capacity, in the  
12 conduct of the affairs of any mortgage broker licensed by the Department or subject to licensure or  
13 regulation by the Department.

14           **E. Restitution.** It is AGREED that Respondents have paid \$2,600 in restitution to consumer  
15 S.V.

16           **F. Fine.** It is AGREED that Respondents jointly and severally shall pay the Department a  
17 fine in the amount of \$1,500.

18           **G. Investigation Fee.** It is AGREED that Respondents jointly and severally shall pay to the  
19 Department an investigation fee of \$715.20.

20           **H. Payment of Fine and Investigation Fee.** Respondents have AGREED that upon entry of  
21 this Consent Order Respondents will commence making payments in the amount of \$200 per month  
22 (payments will be due on or before the first day of each month) until paid in full. Payments will be  
23 made by cashier's check and payable to the "Washington State Treasurer." It is further AGREED  
24 that the Department may refer this fine for collection by the Department's contracted collection

1 agency without further notice to Respondents should Respondents fails to make the \$200 per month  
2 payment.

3 **I. Confession of Judgment for Fine and Investigation Fee.** It is AGREED that  
4 Respondents have attested to their inability to presently pay in full the fine and investigation fee  
5 agreed to in this Consent Order. The Department has accepted a payment plan and a Confession of  
6 Judgment from Respondents for the fine and investigation fee in the amount of \$2,215.20 owed to the  
7 Department. A copy of this Confession of Judgment is attached and incorporated into this Consent  
8 Order by this reference. Consistent with RCW 4.60, the Department may immediately seek entry of  
9 the judgment upon entry of this Consent Order. Respondents shall, upon the Department's request,  
10 fully and promptly cooperate with the Department in its efforts to get the judgment entered by the  
11 superior court. Upon payment in full of the fine and investigation fee, as identified in Paragraphs F  
12 and G, the Department will file a Satisfaction of Judgment with the superior court.

13 **J. Rights of Non-Parties.** It is AGREED that the Department does not represent or have the  
14 consent of any person or entity not a party to this Consent Order to take any action concerning their  
15 personal legal rights. It is further AGREED that for any person or entity not a party to this Consent  
16 Order, this Consent Order does not limit or create any private rights or remedies against Respondents,  
17 limit or create liability of Respondents, or limit or create defenses of Respondents to any claims.

18 **K. Change of Address.** It is AGREED that for the duration of the period this Consent Order  
19 is in effect, unless otherwise agreed to in writing by the Department, Respondents shall provide the  
20 Department with a mailing address and telephone number at which Respondents can be contacted,  
21 and Respondents shall notify the Department in writing of any changes to his mailing address or  
22 telephone number within fifteen days of any such change.

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1           **L. Records Retention.** It is AGREED that Respondents, its officers, employees, and agents  
2 shall maintain records in compliance with the Act and provide the Director with the location of the  
3 books, records and other information relating to Respondents' mortgage broker business, and the  
4 name, address and telephone number of the individual responsible for maintenance of such records in  
5 compliance with the Act.

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

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

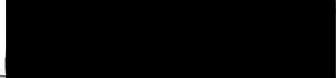
13           **O. Voluntarily Entered.** It is AGREED that the undersigned Respondents have voluntarily  
14 entered into this Consent Order, which is effective when signed by the Director's designee.

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

17 **RESPONDENTS:**

18 Interstate Law Group a/k/a Accredited Law Group

19 By:

20 

21 Richard C. Sipan  
22 Owner/Managing Member

23 

24 Richard C. Sipan  
Individually

3-2-14

Date

3-2-14

Date

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DO NOT WRITE BELOW THIS LINE

THIS ORDER ENTERED THIS 19<sup>th</sup> DAY OF March, 2014.



[Redacted signature]

Deborah Bortner  
Director  
Division of Consumer Services  
Department of Financial Institutions

Presented by:

[Redacted signature]

Wilma M. Colwell  
Financial Examiner

Approved by:

[Redacted signature]

Charles E. Clark  
Enforcement Chief

RECEIVED

MAR 27 2014

CONSENT ORDER  
C-13-1176-13-C001  
Interstate Law Group a/k/a Accredited Law Group  
Richard C. Sipan, Owner and Managing Member

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

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**STATE OF WASHINGTON  
THURSTON COUNTY SUPERIOR COURT**

STATE OF WASHINGTON,  
DEPARTMENT OF FINANCIAL  
INSTITUTIONS,  
  
Plaintiff,

NO.  
  
CONFESSION OF JUDGMENT  
  
*(Clerk's Action Required)*

v.

INTERSTATE LAW GROUP  
a/k/a ACCREDITED LAW GROUP;  
RICHARD C. SIPAN, Owner and  
Managing Member,  
  
Defendants.

**Judgment Summary**

Judgment Creditors:	State of Washington, Department of Financial Institutions
Attorneys for Department of Financial Institutions:	Robert W. Ferguson, Washington Attorney General Mandy A. Weeks, Assistant Attorney General
Judgment Debtors:	Interstate Law Group a/k/a Accredited Law Group Richard C. Sipan, Owner and Managing Member
Principal Judgment Amount:	\$2,215.20 fine and investigation fee owed to the Department of Financial Institutions
Total Judgment Amount:	\$2,215.20
Post-Judgment Interest: (per annum)	12%

1 Pursuant to Chapter 4.60 of the Revised Code of Washington, Judgment by Confession,  
2 Defendants Interstate Law Group a/k/a Accredited Law Group and Richard C. Sipan, Owner  
3 and Managing Member, hereby authorize entry of a judgment under the following terms:

4 **Factual Basis for Judgment**

5 The State of Washington, Department of Financial Institutions, Interstate Law Group  
6 a/k/a Accredited Law Group and Richard C. Sipan (Owner and Managing Member) have  
7 agreed upon a basis for resolution of the matters alleged in Statement of Charges  
8 No. C-13-1176-13-SC01 (Statement of Charges), entered March 25, 2013. Interstate Law  
9 Group a/k/a Accredited Law Group and Richard C. Sipan (Owner and Managing Member)  
10 have agreed to enter into a Confession of Judgment, pursuant to chapter 4.60 RCW, in the total  
11 amount of \$2,215.20 for payment of fines and investigation fee at an interest rate of twelve  
12 percent, which shall be paid to the State of Washington, Department of Financial Institutions.

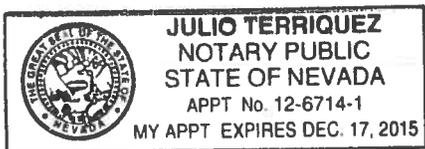
13 **Authorization for Entry of Judgment**

14 I, Richard C. Sipan, being duly sworn upon oath, acknowledge individually and in my  
15 capacity as Owner of Interstate Law Group a/k/a Accredited Law Group, the debt of \$2,215.20  
16 to the State of Washington, Department of Financial Institutions. I authorize entry of judgment  
17 against me for the amounts set forth in the judgment summary above and at an interest rate set  
18 forth in the judgment summary above.

19 DATED this 3rd day of March, 2014.

20 [Redacted Signature]  
21 Richard C. Sipan, Defendant

22 SUBSCRIBED AND SWORN TO before me in Las Vegas (city),  
23 NV (state) this 3rd day of March, 2014.



24 [Redacted Signature] Notary Public in and for the State of  
25 Nevada  
26 Residing at Las Vegas (city), NV (state).  
My Commission expires: 12/17/15

1 **Order for Entry**

2 The above Confession of Judgment having been presented to this Court for entry in  
3 accordance with RCW 4.60.070, the Court having found said Confession of Judgment to be  
4 sufficient, now, therefore, it is hereby

5 ORDERED that the Clerk of this Court shall forthwith enter Judgment against Interstate  
6 Law Group a/k/a Accredited Law Group and Richard C. Sipan (Owner and Managing  
7 Member) in accordance with the terms of the Confession of Judgment.

8  
9 DONE IN OPEN COURT this \_\_\_\_ day of \_\_\_\_\_, 2014.

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11  
12 \_\_\_\_\_  
JUDGE/COURT COMMISSIONER

13 Presented by:

14 ROBERT W. FERGUSON  
15 Attorney General

16 \_\_\_\_\_  
17 MANDY A. WEEKS, WSBA #45680  
18 Assistant Attorney General  
19 Attorneys for State of Washington  
20 Department of Financial Institutions  
21  
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25  
26

1 **STATE OF WASHINGTON**  
2 **DEPARTMENT OF FINANCIAL INSTITUTIONS**  
3 **DIVISION OF CONSUMER SERVICES**

4 IN THE MATTER OF DETERMINING  
Whether there has been a violation of the  
Mortgage Broker Practices Act of Washington by:

5 INTERSTATE LAW GROUP A/K/A  
6 ACCREDITED LAW GROUP  
and  
7 RICHARD SIPAN, Owner and Managing Member,

8 Respondents.

No. C-13-1176-13-SC01

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

9 **INTRODUCTION**

10 Pursuant to RCW 19.146.220 and RCW 19.146.223, the Director of the Department of Financial  
11 Institutions of the State of Washington (Director) is responsible for the administration of chapter  
12 19.146 RCW, the Mortgage Broker Practices (Act). After having conducted an investigation pursuant  
13 to RCW 19.146.235, and based upon the facts available as of the date of this Statement of Charges, the  
14 Director, through his designee, Division of Consumer Services Director Deborah Bortner, institutes  
15 this proceeding and finds as follows:

16 **I. FACTUAL ALLEGATIONS**

17 **1.1 Respondents.**

18 **A. Interstate Law Group a/k/a Accredited Law Group (Respondent Interstate Law**  
19 **Group)** has never been licensed by the Department of Financial Institutions of the State of  
20 Washington (Department) to conduct business as a mortgage broker or loan originator.

21 **B. Richard Sipan (Respondent Sipan)** is Owner and Managing Member of Interstate Law  
22 Group. During the relevant time period, Respondent Sipan was not licensed by the Department to  
23 conduct business as a mortgage broker or loan originator.

1 **1.2 Unlicensed Activity.** Between at least June 29, 2012, and the date of this Statement of  
2 Charges, Respondents were offering residential mortgage loan modification services to Washington  
3 consumers on property located in Washington State. Respondents entered into a contractual  
4 relationship with at least one Washington consumer to provide those services and collected an advance  
5 fee for the provision of those services. The Department has received at least one complaint from a  
6 Washington consumer alleging Respondents provided or offered to provide residential mortgage loan  
7 modification services while not licensed by the Department to provide those services. The consumer  
8 S.V. paid Respondents a fee of \$2,600.

9 **1.3 Misrepresentations and Omissions.** Respondents represented that they were licensed to  
10 provide the residential mortgage loan modification services or omitted disclosing that they were not  
11 licensed to provide those services.

12 **1.4 On-Going Investigation.** The Department's investigation into the alleged violations of the  
13 Act by Respondents continues to date.

## 14 **II. GROUNDS FOR ENTRY OF ORDER**

15 **2.1 Mortgage Broker Defined.** Pursuant to RCW 19.146.010(14) and WAC 208-660-006,  
16 "Mortgage Broker" means any person who, for compensation or gain, or in the expectation of  
17 compensation or gain (a) assists a person in obtaining or applying to obtain a residential mortgage loan  
18 or (b) holds himself or herself out as being able to make a residential mortgage loan or assist a person  
19 in obtaining or applying to obtain a residential mortgage loan. Pursuant to WAC 208-660-006, a  
20 person "assists a person in obtaining or applying to obtain a residential mortgage loan" by, among  
21 other things, counseling on loan terms (rates, fees, other costs), [and] preparing loan packages...."

22 **2.2 Loan Originator Defined.** Pursuant to RCW 19.146.010(11), "loan originator" means a  
23 natural person who for direct or indirect compensation or gain, or in the expectation of direct or  
24 indirect compensation or gain: takes a residential mortgage loan application for a mortgage broker;

1 offers or negotiates terms of a mortgage loan; or holds themselves out to the public as able to perform  
2 any of these activities.

3 **2.3 Prohibited Acts.** Based on the Factual Allegations set forth in Section I above, Respondents  
4 are in apparent violation of RCW 19.146.0201(2) & (3) for engaging in an unfair or deceptive practice  
5 toward any person and obtaining property by fraud or misrepresentation.

6 **2.4 Requirement to Obtain and Maintain Mortgage Broker License.** Based on the Factual  
7 Allegations set forth in Section I above, Respondents are in apparent violation of RCW 19.146.200(1)  
8 for engaging in the business of a mortgage broker for Washington residents or property without first  
9 obtaining a license to do so.

10 **2.5 Requirement to Obtain and Maintain Loan Originator License.** Based on the Factual  
11 Allegations set forth in Section I above, Respondents are in apparent violation of RCW 19.146.200(1)  
12 for engaging in the business of a loan originator without first obtaining and maintaining a license.

13 **2.6 Requirement to Maintain Accurate and Current Books and Records.** Pursuant to RCW  
14 19.146.060 and WAC 208-660-450, Respondents are required to keep all books and records in a  
15 location that is on file with and readily available to the Department until at least twenty-five months  
16 have elapsed following the effective period to which the books and records relate.

### 17 III. AUTHORITY TO IMPOSE SANCTIONS

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

21 **3.2 Authority to Prohibit from Industry.** Pursuant to RCW 19.146.220(5), the Director may  
22 issue orders prohibiting from participation in the conduct of the affairs of a licensed mortgage broker  
23 any person subject to licensing under the Act for any violation of RCW 19.146.0201(1) through (9) or  
24 (13), or RCW 19.146.200.

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

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

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

#### 8 **IV. NOTICE OF INTENT TO ENTER ORDER**

9 Respondents' violations of the provisions of chapter 19.146 RCW and chapter 208-660 WAC, as  
10 set forth above constitute a basis for the entry of an Order under RCW 19.146.220, RCW 19.146.221,  
11 and RCW 19.146.223. Therefore, it is the Director's intent to ORDER that:

12 **4.1** Respondents cease and desist engaging in the business of a mortgage broker or loan originator.

13 **4.2** Respondents be prohibited from participation, in any manner, in the conduct of the affairs of  
14 any mortgage broker subject to licensure by the Director for a period of five years.

15 **4.3** Respondents jointly and severally pay restitution to the consumer identified by the Department  
16 in paragraph 1.2 in the amount set forth therein, and that Respondents jointly and severally pay  
17 restitution to each Washington consumer with whom they entered into a contract for residential  
mortgage loan modification services related to real property or consumers located in the state  
of Washington equal to the amount collected from that Washington consumer for those  
services in an amount to be determined at hearing.

18 **4.4** Respondents jointly and severally pay a fine, which as of the date of this Statement of Charges  
19 totals \$3,000.

20 **4.5** Respondents jointly and severally pay an investigation fee, which as of the date of this  
21 Statement of Charges totals \$715.20.

22 **4.6** Respondents maintain records in compliance with the Act and provide the Department with the  
23 location of the books, records and other information relating to Respondents' provision of  
residential mortgage loan modification services in Washington, and the name, address and  
telephone number of the individual responsible for maintenance of such records in compliance  
with the Act.

1 **V. AUTHORITY AND PROCEDURE**

2 This Statement of Charges is entered pursuant to the provisions of RCW 19.146.220, RCW  
3 19.146.221, RCW 19.146.223, and RCW 19.146.230, and is subject to the provisions of chapter 34.05  
4 RCW (The Administrative Procedure Act). Respondents may make a written request for a hearing as  
5 set forth in the NOTICE OF OPPORTUNITY TO DEFEND AND OPPORTUNITY FOR HEARING  
6 accompanying this Statement of Charges.

7 Dated this 25<sup>th</sup> day of March, 2013.

8  
9  
10 /S/  
11 DEBORAH BORTNER  
12 Director, Division of Consumer Services  
Department of Financial Institutions

13 Presented by:

14  
15 /S/  
16 WILMA M. COLWELL  
Financial Examiner

17 Approved by:

18  
19 /S/  
20 CHARLES E. CLARK  
Enforcement Chief