

ORDER SUMMARY – Case Number: C-13-1208

Names: Wilford Thomas Lee, W.T. Lee & Associates LLC, d/b/a
The Law Offices of W.T. Lee & Associates

Order Number: C-13-1208-15-FO01

Effective Date: July 20, 2015

License Number: N/A

Prohibition/Ban Until: Five years from the effective date of the Final Order

Restitution:	\$237,026.25	Due: 30 days after service	Paid: <input type="checkbox"/> Y <input checked="" type="checkbox"/> N	Date
Fine:	\$120,000.00	Due: 30 days after service	Paid: <input type="checkbox"/> Y <input checked="" type="checkbox"/> N	Date
Inv. Costs:	\$ 312.00	Due: 30 days after service	Paid: <input type="checkbox"/> Y <input checked="" type="checkbox"/> N	Date
No. of Victims:	40			

Comments: Respondent Wilford T. Lee and his firm must immediately cease and desist engaging in the business of a mortgage broker or loan originator; Respondent Wilford T. Lee and his firm are prohibited from participating, in any manner, in the conduct of the affairs of any mortgage broker licensed by or subject to licensure by the Department for a period of five years; Respondent Wilford T. Lee and his firm are jointly and severally liable to pay restitution as outlined above; Respondent Wilford T. Lee and his firm are jointly and severally liable to pay \$120,312 in fines and fees to the Department within 30 days of receipt of this Final Order.



STATE OF WASHINGTON
DEPARTMENT OF FINANCIAL INSTITUTIONS

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

No. C-13-1208-15-FO01

FINAL ORDER

WILFORD THOMAS LEE, and W.T. LEE &
ASSOCIATES, LLC, d/b/a THE LAW OFFICES
OF W.T. LEE & ASSOCIATES,

Respondents.

I. DIRECTOR'S CONSIDERATION

Procedural History.¹ This matter has come before the Director of the Department of Financial Institutions of the State of Washington ("Director"), pursuant to RCW 34.05.440(2) and RCW 34.05.464. On March 28, 2013, the Director, through his designee, former Consumer Services Division Director Deborah Bortner, issued a 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 ("Statement of Charges") against Wilford Thomas Lee and W.T. Lee & Associates, LLC, d/b/a The Law Offices of W.T. Lee & Associates ("Respondents").² The Statement of Charges was accompanied by a cover letter dated March 29, 2013, a Notice of Opportunity to Defend and Opportunity for Hearing, and blank Applications for Adjudicative Hearing for Respondents. On March 29, 2013, the Department of Financial Institutions ("Department") served Respondents with the Statement of Charges and accompanying documents.

¹ The procedural history is limited to those events directly relevant to and supporting the Initial Order.

² Volume 1, No. 1, Statement of Charges. (References are to the OAH Docket by Volume and Index number.)

1 On April 6, 2013, Respondents filed an Application for Adjudicative Hearing. On April 8,
2 2013, the Department made a request to the Office of Administrative Hearings (“OAH”) to assign an
3 Administrative Law Judge (“ALJ”) to schedule and conduct a hearing on the Statement of Charges.
4 On May 2, 2013, ALJ Lisa Dublin issued a Notice of Prehearing Conference scheduling a prehearing
5 conference on May 29, 2013.³

6 On May 29, 2013, ALJ Robert Krabill convened the telephonic prehearing conference and
7 counsel for both the Department and Respondents attended. On June 3, 2013, ALJ Robert Krabill
8 issued a Notice of Hearing and Prehearing Conference Order scheduling a hearing for December 17-
9 19, 2013.⁴

10 On November 21, 2013, ALJ Lisa Durbin (“ALJ Durbin”) issued an Amended Notice of
11 Status Conference scheduling a status conference for November 27, 2013.⁵

12 On November 27, 2013, ALJ Dublin convened the Status Conference and counsel for both
13 the Department and Respondents attended. On December 2, 2013, ALJ Dublin issued another
14 Notice of Status Conference, noting the parties had stipulated to a continuance of the hearing and
15 related dates, and agreed to the December 6, 2013, status conference.⁶

16 On December 6, 2013, ALJ Dublin convened the status conference and counsel for both the
17 Department and Respondents attended. On December 13, 2013, ALJ Dublin issued the First
18 Amended Notice of Hearing and Prehearing Conference Order (“First Amended Notice and Order”),
19 scheduling a hearing for April 2-4, 2014.⁷

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22 ³ Volume 1, No. 5, Notice of Prehearing Conference.

⁴ Volume 1, No. 6, Notice of Hearing and Prehearing Conference Order.

⁵ Volume 2, No. 18, Amended Notice of Status Conference.

⁶ Volume 2, No. 22, Notice of Status Conference.

⁷ Volume 2, No. 27, First Amended Notice of Hearing and Prehearing Conference Order.

1 On March 25, 2014, ALJ Dublin issued a Notice of Motion Hearing for March 28, 2014, to
2 hear arguments on Respondents' Motion to Continue the Hearing Date.⁸

3 On March 28, 2014, ALJ Dublin convened the hearing on Respondents' motion and counsel
4 for both the Department and Respondents attended. On April 9, 2014, ALJ Dublin issued an Order
5 on Motion to Continue, Notice of Hearing, and Second Amended Prehearing Conference Order
6 ("Second Amended Notice and Order") scheduling the hearing for July 14-16, 2014.⁹

7 On June 17, 2014, counsel for Respondents filed a Notice of Withdrawal of Counsel
8 providing the address of his clients.¹⁰ On the same date, the Department's counsel sent a letter to
9 ALJ Dublin, with a copy to Respondents at the address provided, seeking a status conference to
10 ascertain whether Respondents intended to continue to contest the Statement of Charges.

11 On June 27, 2014, ALJ Dublin issued a Notice of Status Conference scheduling a status
12 conference to take place on July 8, 2014, at 10:00 a.m.¹¹

13 On July 8, 2014, ALJ Dublin convened the status conference. The Department appeared
14 through counsel and Respondents appeared through Respondent Wilford Thomas Lee. On July 9,
15 2014, ALJ Dublin issued an Order on Motion to Continue, Notice of Hearings, and Third Amended
16 Prehearing Conference Order ("Third Amended Notice and Order") scheduling a hearing for
17 October 16-17, 2014, and setting deadlines for the Department's filing of a Motion for Summary
18 Judgment, Respondents' response, and the Department's reply, and scheduling a hearing on the
19 Department's Motion for Summary Judgment for August 19, 2014, at 1:30 p.m. The Third
20 Amended Notice and Order advised the parties in bold font: "**If you do not participate in any stage**
21

22 ⁸ Volume 3, No. 40, Notice of Motion Hearing.

⁹ Volume 3, No. 46, Order on Motion to Continue, Notice of Hearings, and Third Amended Prehearing Conference
Order.

23 ¹⁰ Volume 3, No. 55, Notice of Withdrawal of Counsel.

¹¹ Volume 3, No. 56, Notice of Status Conference.

1 **of the proceedings or if you fail to appear at your hearings, you may be held in default. This**
2 **means you lose the right to a hearing and the decision made by the agency remains in effect.**
3 **RCW 34.05.440.”¹²**

4 On July 14, 2014, the Department filed a Motion for Summary Judgment. Respondents did
5 not file a response.

6 On August 19, 2014, at 1:30 p.m., ALJ Durbin convened the hearing on the Department’s
7 Motion for Summary Judgment. The Department appeared and was represented by counsel;
8 however, Respondents did not appear and the Department orally moved for default.

9 On August 20, 2014, ALJ Durbin issued an Order on Motion for Default and Notice of
10 Motion Hearing (“Order and Notice”) denying the Department’s oral motion for default and
11 rescheduling the hearing on the Department’s Motion for Summary Judgment to August 29, 2014, at
12 1:30 p.m. OAH served the Order and Notice on Respondents by mail and by facsimile. The Order
13 and Notice included the following warning in bold font: **“If you do not participate in any stage of**
14 **the proceedings or if you fail to appear at your hearings, you may be held in default. This**
15 **means you lose the right to a hearing and the decision made by the agency remains in effect.**
16 **RCW 34.05.440.”¹³**

17 On August 29, 2014, at 1:30 p.m. ALJ Durbin convened the Motion Hearing on the
18 Department’s Motion for Summary Judgment. The Department appeared and was represented by
19 counsel; however, Respondents did not appear. The Department’s Exhibits in support of their
20 Motion for Summary Judgment were admitted into evidence.

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23 ¹² Volume 3, No. 57, Order on Motion to Continue, Notice of Hearings, and Third Amended Prehearing Conference Order.

¹³ Volume 4, No. 62, Order on Motion for Default and Notice of Motion Hearing.

1 On September 30, 2014, ALJ Durbin entered an Initial Order Granting Summary Judgment,
2 and in the Alternative, Default for Failure to Appear (“Initial Order”). The Initial Order ordered that:

- 3 • The Department’s Motion for Summary Judgment is granted.
- 4 • Appellants must cease and desist providing residential loan modification services to
5 Washington consumers for a period of five years commencing immediately.
- 6 • Appellants are jointly and severally liable for paying restitution to Washington
7 consumers in the amount of \$237,026.25.
- 8 • Appellants are jointly and severally liable for paying a fine to the Department in the
9 amount of \$120,000.00.
- 10 • Appellants are jointly and severally liable for paying the Department’s investigative
11 fees in the amount of \$312.00.
- 12 • In the alternative, Appellants are in default under RCW 34.05.440 and their
13 administrative appeal is hereby DISMISSED.

14 A. Record Presented. The record presented to the Director for his review and for entry of a
15 final decision included the following:

- 16 1. Statement of Charges, cover letter dated March 29, 2013, Notice of Opportunity to
17 Defend and Opportunity for Hearing, Applications for Adjudicative Hearing, with
18 documentation of service.
- 19 2. Applications for Adjudicative Hearing for Wilford Thomas Lee and W.T. Lee &
20 Associates d/b/a The Law Offices of WT Lee & Associates.
- 21 3. Department’s Request to OAH for Assignment of Administrative Law Judge.
- 22 4. Notice of Prehearing Conference dated May 2, 2013, with documentation of service.
- 23 5. Notice of Hearing and Prehearing Conference Order dated June 3, 2013, with
documentation of service.
6. Amended Notice of Status Conference dated November 21, 2013, with
documentation of service.
7. Notice of Status Conference dated December 2, 2013, with documentation of service.

- 1 8. First Amended Notice of Hearing and Prehearing Conference Order dated December
2 13, 2013, with documentation of service.
- 3 9. Notice of Motion Hearing dated March 25, 2014, with documentation of service.
- 4 10. Order on Motion to Continue, Notice of Hearing, and Second Amended Prehearing
5 Conference Order dated April 9, 2014, with documentation of service.
- 6 11. Notice of Withdrawal of Counsel.
- 7 12. Notice of Status Conference dated June 27, 2014, with documentation of service.
- 8 13. Order on Motion to Continue, Notice of Hearings, and Third Amended Prehearing
9 Conference Order dated July 9, 2014, with documentation of service.
- 10 14. Order on Motion for Default and Notice of Motion Hearing dated August 20, 2014,
11 2014, with documentation of service.
- 12 15. Initial Order Granting Summary Judgment, and in the Alternative, Default for Failure
13 to Appear dated September 30, 2014, with documentation of service.

14 B. Factual Findings and Grounds for Order. Pursuant to RCW 34.05.440(2) and RCW
15 34.05.461, the Director hereby adopts the Initial Order Granting Summary Judgment, and in the
16 Alternative, Default for Failure to Appear which is attached hereto.

17 II. FINAL ORDER

18 Based upon the foregoing, and the Director having considered the record and being otherwise
19 fully advised, NOW, THEREFORE:

20 A. IT IS HEREBY ORDERED, That:

- 21 1. Respondents Wilford Thomas Lee and W.T. Lee & Associates, LLC, immediately
22 cease and desist engaging in the business of a mortgage broker or loan originator.
- 23 2. Respondents Wilford Thomas Lee and W.T. Lee & Associates, LLC are prohibited
from participation, in any manner, in the conduct of the affairs of any mortgage
broker subject to licensure by the Director for a period of five years.
3. Respondents Wilford Thomas Lee and W.T. Lee & Associates, LLC shall jointly
and severally pay restitution totaling Two Hundred Thirty Seven Thousand

1 Twenty Six and 25/100 Dollars (\$237,026.25) to the consumers identified in
2 Exhibit A to this order.

- 3 4. Respondents Wilford Thomas Lee and W.T. Lee & Associates, LLC shall jointly
4 and severally pay to the Washington State Department of Financial Institutions,
5 within thirty (30) days of receipt of this order, a fine of One Hundred Twenty
6 Thousand and 00/100 Dollars (\$120,000).
- 7 5. Respondents Wilford Thomas Lee and W.T. Lee & Associates, shall jointly and
8 severally pay to the Washington State Department of Financial Institutions, within
9 thirty (30) days of receipt of this order, an investigation fee of Three Hundred
10 Twelve and 00/100 Dollars (\$312)¹⁴.

11 B. Reconsideration. Pursuant to RCW 34.05.470, Respondents Wilford Thomas Lee and
12 W.T. Lee & Associates, LLC, d/b/a The Law Offices of W.T. Lee & Associates, each have the right
13 to file a Petition for Reconsideration stating the specific grounds upon which relief is requested. The
14 Petition must be filed in the Office of the Director of the Department of Financial Institutions by
15 courier at 150 Israel Road SW, Tumwater, Washington 98501, or by U.S. Mail at P.O. Box 41200,
16 Olympia, Washington 98504-1200, within ten (10) days of service of the Final Order upon
17 Respondents Wilford Thomas Lee and W.T. Lee & Associates, LLC, d/b/a The Law Offices of W.T.
18 Lee & Associates. The Petition for Reconsideration shall not stay the effectiveness of this order nor
19 is a Petition for Reconsideration a prerequisite for seeking judicial review in this matter.

20 A timely Petition for Reconsideration is deemed denied if, within twenty (20) days from the
21 date the petition is filed, the agency does not (a) dispose of the petition or (b) serve the parties with a
22 written notice specifying the date by which it will act on a petition.

23 C. Stay of Order. The Director has determined not to consider a Petition to Stay the
effectiveness of this order. Any such requests should be made in connection with a Petition for
Judicial Review made under chapter 34.05 RCW and RCW 34.05.550.

¹⁴ The combined fine and investigation fee may be paid together in the form of a cashier's check in the amount of \$120,312 made payable to the
"Washington State Treasurer."

1 D. Judicial Review. Respondents Wilford Thomas Lee and W.T. Lee & Associates, LLC,
2 d/b/a The Law Offices of W.T. Lee & Associates, each have the right to petition the Superior Court
3 for judicial review of this agency action under the provisions of chapter 34.05 RCW. For the
4 requirements for filing a Petition for Judicial Review, see RCW 34.05.510 and sections following.

5 E. Non-compliance with Order. If any Respondent does not comply with the terms of this
6 order, including payment of any amounts owed within thirty (30) days of receipt of this order, the
7 Department may seek its enforcement by the Office of the Attorney General to include the collection
8 of the fines and fees imposed herein. The Department also may assign the amounts owed to a
9 collection agency for collection.

10 F. Service. For purposes of filing a Petition for Reconsideration or a Petition for Judicial
11 Review, service is effective upon deposit of this order by the Department in the U.S. mail,
12 declaration of service attached hereto.

13 DATED this 20th day of July, 2015.



14 STATE OF WASHINGTON
15 DEPARTMENT OF FINANCIAL INSTITUTIONS

16 [Redacted Signature]
17 SCOTT JARVIS
18 Director

Exhibit A: Restitution List

W.T. LEE CONTROL NO.	WASHINGTON CONSUMER INITIALS	RESTITUTION AMOUNT DUE
1	DH	\$ 9,889.00
2	DD	\$ 9,757.50
3	JG	\$ 4,471.00
4	MS	\$ 2,682.00
5	BM	\$ 5,143.00
6	DP	\$ 8,998.00
7	DS	\$ 10,292.00
8	BH	\$ 4,367.00
9	FT	\$ 5,155.00
10	RS	\$ 9,711.25
11	DA	\$ 10,675.00
12	RN	\$ 2,930.00
13	JM	\$ 5,946.00
14	JC	\$ 14,552.00
15	NP	\$ 9,400.00
16	JW	\$ 6,737.02
17	MV	\$ 5,238.50
18	MS	\$ 9,089.00
19	TW	\$ 2,674.25
20	WW	\$ 5,161.00
21	DC	\$ 3,589.60
22	EL	\$ 4,366.00
23	RV	\$ 7,125.00
24	JN	\$ 5,833.00
25	RP	\$ 4,367.00
26	RR	\$ 4,461.00
27	JE	\$ 5,549.00
28	KR	\$ 6,337.00
29	RR	\$ 7,221.00
30	WG	\$ 5,925.00
31	DR	\$ 4,767.00
32	KT	\$ 3,967.00
33	WW	\$ 9,612.25
34	VA	\$ 3,523.50
35	MS	\$ 1,887.00
36	MC	\$ 5,949.00
37	RH	\$ 4,967.88
38	AC	\$ 1,187.00
39	DW	\$ 3,523.50
40	TT	\$ -
		\$ 237,026.25

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 WILFORD THOMAS LEE, and W.T. LEE &
6 ASSOCIATES, LLC, d/b/a THE LAW OFFICES
OF W.T. LEE & ASSOCIATES,

7 Respondents.

No. C-13-1208-13-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

8 INTRODUCTION

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

15 I. FACTUAL ALLEGATIONS

16 1.1 Respondents.

17 A. **Wilford Thomas Lee (Respondent Lee)** is believed to be the owner and founder of
18 Respondent WT Lee & Associates, LLC. Respondent Lee is licensed by the State Bar of California,
19 member number 166168. During the relevant time period, Respondent Lee was not licensed by the
20 Washington State Bar Association to provide legal services in Washington State, and has never been
21 licensed by the Department of Financial Institutions of the State of Washington (Department) to
22 conduct business as a mortgage broker or loan originator.

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1 a person ““assists a person in obtaining or applying to obtain a residential mortgage loan’ by, among
2 other things, counseling on loan terms (rates, fees, other costs), [and] preparing loan packages....”

3 **2.2 Loan Originator Defined.** Pursuant to RCW 19.146.010(11), “loan originator” means a
4 natural person who for direct or indirect compensation or gain, or in the expectation of direct or
5 indirect compensation or gain: takes a residential mortgage loan application for a mortgage broker;
6 offers or negotiates terms of a mortgage loan; or holds themselves out to the public as able to perform
7 any of these activities.

8 **2.3 Prohibited Acts.** Based on the Factual Allegations set forth in Section I above, Respondents
9 are in apparent violation of RCW 19.146.0201(2) & (3) for engaging in an unfair or deceptive
10 practice toward any person and obtaining property by fraud or misrepresentation.

11 **2.4 Requirement to Obtain and Maintain Mortgage Broker License.** Based on the Factual
12 Allegations set forth in Section I above, Respondents are in apparent violation of RCW 19.146.200(1)
13 for engaging in the business of a mortgage broker for Washington residents or property without first
14 obtaining a license to do so.

15 **2.5 Requirement to Obtain and Maintain Loan Originator License.** Based on the Factual
16 Allegations set forth in Section I above, Respondents are in apparent violation of RCW 19.146.200(1)
17 for engaging in the business of a loan originator without first obtaining and maintaining a license.

18 **2.6 Requirement to Maintain Accurate and Current Books and Records.** Pursuant to RCW
19 19.146.060 and WAC 208-660-450, Respondents are required to keep all books and records in a
20 location that is on file with and readily available to the Department until at least twenty-five months
21 have elapsed following the effective period to which the books and records relate.

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1 **III. AUTHORITY TO IMPOSE SANCTIONS**

2 **3.1 Authority to Issue an Order to Cease and Desist.** Pursuant to RCW 19.146.220(4), the
3 Director may issue orders directing any person subject to the Act to cease and desist from conducting
4 business.

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

9 **3.3 Authority to Order Restitution.** Pursuant to RCW 19.146.220(2), the Director may order
10 restitution against any person subject to the Act for any violation of the Act.

11 **3.4 Authority to Impose Fine.** Pursuant to RCW 19.146.220(2), the Director may impose fines
12 against any person subject to the Act for any violation of the Act.

13 **3.5 Authority to Collect Investigation Fee.** Pursuant to RCW 19.146.228(2), and WAC 208-
14 660-550(4)(a), the Department will charge forty-eight dollars per hour for an examiner's time devoted
15 to an investigation of any person subject to the Act.

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

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

20 **4.1** Respondents Wilford Thomas Lee and W.T. Lee & Associates, LLC, immediately cease and
21 desist engaging in the business of a mortgage broker or loan originator.

22 **4.2** Respondents Wilford Thomas Lee and W.T. Lee & Associates, LLC be prohibited from
23 participation, in any manner, in the conduct of the affairs of any mortgage broker subject to
24 licensure by the Director for a period of five years.

4.3 Respondents Wilford Thomas Lee and W.T. Lee & Associates, LLC jointly and severally pay
restitution to the consumer identified by the Department in paragraph 1.2 in the amount set

1 forth therein, and that Respondents Wilford Thomas Lee and W.T. Lee & Associates, LLC
2 jointly and severally pay restitution to each Washington consumer with whom they entered
3 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.

4 **4.4** Respondents Wilford Thomas Lee and W.T. Lee & Associates, LLC jointly and severally pay
a fine, which as of the date of this Statement of Charges totals \$120,000.

5 **4.5** Respondents Wilford Thomas Lee and W.T. Lee & Associates, LLC jointly and severally pay
6 an investigation fee, which as of the date of this Statement of Charges totals \$312.

7 **4.6** Respondents Wilford Thomas Lee and W.T. Lee & Associates, LLC maintain records in
8 compliance with the Act and provide the Department with the location of the books, records
9 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.

10 **V. AUTHORITY AND PROCEDURE**

11 This Statement of Charges is entered pursuant to the provisions of RCW 19.146.220, RCW
12 19.146.221, RCW 19.146.223, and RCW 19.146.230, and is subject to the provisions of chapter 34.05
13 RCW (The Administrative Procedure Act). Respondents may make a written request for a hearing as
14 set forth in the NOTICE OF OPPORTUNITY TO DEFEND AND OPPORTUNITY FOR HEARING
15 accompanying this Statement of Charges.

16 Dated this 28th day of March, 2013.



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19
20
21 Presented by:

22 [Redacted Signature]
23 ANTHONY W. CARTER
Senior Enforcement Attorney

24 [Redacted Signature]
DEBORAH BORTNER
Director, Division of Consumer Services
Department of Financial Institutions

Approved by:

[Redacted Signature]
CHARLES E. CLARK
Enforcement Chief