

## ORDER SUMMARY – Case Number: C-14-1446

**Name(s):** Secure Settlement, Inc. d/b/a National Housing Advocates and Benjamin Borazghi

**Order Number:** C-14-1446-14-CO01

**Effective Date:** January 27, 2015

**License Number:**  
**Or NMLS Identifier [U/L]** Unlicensed

**License Effect:**

**Not Apply Until:** January 27, 2025

**Not Eligible Until:** January 27, 2025

**Prohibition/Ban Until:** January 27, 2025

<b>Investigation Costs</b>	\$2,457.60	Due	Paid <input checked="" type="checkbox"/> Y <input type="checkbox"/> N	Date 11/19/2014
<b>Fine</b>	\$3,000	Due \$1,457.60 – due on 11/21/2014	Paid <input type="checkbox"/> Y <input checked="" type="checkbox"/> N	Date \$1,542.40 paid 11/19/2014 \$1,457.60 unpaid.
<b>Assessment(s)</b>	\$	Due	Paid <input type="checkbox"/> Y <input type="checkbox"/> N	Date
<b>Restitution</b>	\$	Due	Paid <input 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:		2		

Comments:

1  
2  
3  
4  
5  
6  
7  
8  
9  
10  
11  
12  
13  
14  
15  
16  
17  
18  
19  
20  
21  
22  
23  
24

**STATE OF WASHINGTON  
DEPARTMENT OF FINANCIAL INSTITUTIONS  
DIVISION OF CONSUMER SERVICES**

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

No.: C-14-1446-14-CO01

CONSENT ORDER

SECURE SETTLEMENT, INC. d/b/a  
NATIONAL HOUSING ADVOCATES, and  
BENJAMIN BORAZGHI, President,

Respondents.

COMES NOW the Director of the Department of Financial Institutions (Director), through his  
designee Charles E. Clark, Division Director, Division of Consumer Services, and Respondent  
Secure Settlement, Inc. (Respondent Secure) d/b/a National Housing Advocates and Respondent  
Benjamin Borazghi (Respondent Borazghi), President (collectively, "Respondents"), and finding that  
the issues raised in the above-captioned matter may be economically and efficiently settled, agree to  
the entry of this Consent Order. This Consent Order is entered pursuant to chapter 19.146 of the  
Revised Code of Washington (RCW), and RCW 34.05.060 of the Administrative Procedure Act,  
based on the following:

**AGREEMENT AND ORDER**

The Department of Financial Institutions, Division of Consumer Services (Department) and  
Respondents have agreed upon a basis for resolution of the matters alleged in Temporary Order to  
Cease and Desist No. C-14-1446-14-TD01 (Order to Cease and Desist), and Statement of Charges  
No. C-14-1446-14-SC01 (Statement of Charges), entered July 7, 2014, incorporated herein by  
reference and attached hereto. Pursuant to chapter 19.146 RCW, the Mortgage Broker Practices Act  
(Act), and RCW 34.05.060 of the Administrative Procedure Act, Respondents hereby agree to the  
Department's entry of this Consent Order and further agree that the issues raised in the above-  
captioned matter may be economically and efficiently settled by entry of this Consent Order. The

1 parties intend this Consent Order to fully resolve the Order to Cease and Desist and Statement of  
2 Charges.

3 Based upon the foregoing:

4 A. **Jurisdiction.** It is AGREED that the Department has jurisdiction over the subject matter  
5 of the activities discussed herein.

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

11 C. **Prohibition from Industry.** It is AGREED that, for a period of ten (10) years from the  
12 date of entry of this Consent Order, Respondents are prohibited from participating, in any capacity, in  
13 the conduct of the affairs of any mortgage broker licensed by the Department or subject to licensure  
14 or regulation by the Department. This prohibition includes but is not limited to negotiating any terms  
15 of a residential mortgage loan, performing any residential loan modification services, or holding out  
16 as able to assist or perform any of the above listed services through any entity in which Respondents  
17 participate in any capacity, including but not limited to: (1) any financial capacity whether active or  
18 passive, (2) as an officer, director, principal, employee, and (3) any management, control, or  
19 oversight.

20 D. **Fine.** It is AGREED that Respondents shall pay a fine to the Department in the amount of  
21 \$3,000. It is further AGREED that Respondents shall make two payments to the Department in the  
22 form of cashier's checks made payable to the "Washington State Treasurer." Respondents shall make  
23 its first payment to the Department in the amount of \$1,542.40 upon entry of this Consent Order.

1 Respondents shall a make its second payment to the Department in the amount of \$1,457.60 on or  
2 before November 21<sup>st</sup>, 2014.

3 **E. Investigation Fee.** It is AGREED that Respondents shall pay to the Department an  
4 investigation fee of \$2,457.60 in the form of a cashier's check made payable to the "Washington  
5 State Treasurer" upon entry of this Consent Order. The Fine and Investigation Fee due upon entry of  
6 the Consent Order may be paid together in one \$4,000 cashier's check made payable to the  
7 "Washington State Treasurer."

8 **F. Records Retention.** It is AGREED that Respondents, its officers, employees, and agents  
9 shall maintain records in compliance with the Act and provide the Director with the location of the  
10 books, records and other information relating to Respondent Secure's mortgage broker business, and  
11 the name, address and telephone number of the individual responsible for maintenance of such  
12 records in compliance with the Act.

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

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

20 **I. Voluntarily Entered.** It is AGREED that Respondents have voluntarily entered into this  
21 Consent Order, which is effective when signed by the Director's designee.

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

24 //

1 **RESPONDENTS:**

2 Secure Settlement, Inc. d/b/a National Housing Advocates

3 By:

[Redacted Signature]

4 Benjamin Borazghi  
5 Owner

11/14/14  
Date

[Redacted Signature]

6 Benjamin Borazghi  
7 Individually

11/14/14  
Date

8 Approved for Entry:

[Redacted Signature]

9  
10 Matthew VanZeipel, WSBA No. 45768  
11 Attorney at Law  
12 Othello Law Group  
13 Attorney for Respondents

11/24/14  
Date

14 //

15 //

16 //

17 //

18 //

19 //

20 //

21 //

22 //

23 //

24 //

CONSENT ORDER  
C-14-1446-14-CO01  
SECURE SETTLEMENT, INC. D/B/A NATIONAL  
HOUSING ADVOCATES, AND BENJAMIN BORAZGHI,  
PRESIDENT

DO NOT WRITE BELOW THIS LINE

THIS ORDER ENTERED THIS 27<sup>th</sup> DAY OF January, 2015



  
CHARLES E. CLARK  
Director, Division of Consumer Services  
Department of Financial Institutions

Presented by:

  
RACHELLE VILLALOBOS  
Financial Legal Examiner

Approved by:

  
STEVEN C. SHERMAN  
Enforcement Chief

**STATE OF WASHINGTON  
DEPARTMENT OF FINANCIAL INSTITUTIONS  
DIVISION OF CONSUMER SERVICES**

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

SECURE SETTLEMENT, INC. d/b/a NATIONAL  
HOUSING ADVOCATES, and BENJAMIN  
BORAZGHI, President,

Respondents.

No. C-14-1446-14-SC01

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

**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). After having conducted an investigation pursuant to RCW 19.146.235, and based upon the facts available as of the date of this Statement of Charges, the Director, through his designee, Division of Consumer Services Director Deborah Bortner, institutes this proceeding and finds as follows:

**I. FACTUAL ALLEGATIONS**

**1.1 Respondents.**

**A. Secure Settlement Inc. (Respondent Secure)** is a corporation registered with the California Secretary of State. Respondent Secure has done business as National Housing Advocates. Respondent Secure has never been licensed by the Department of Financial Institutions of the State of Washington (Department) to conduct business as a mortgage broker.

**B. Benjamin Borazghi (Respondent Borazghi)** is the President of Respondent Secure. Respondent Borazghi also does business as Homeowner Protection Alliance. During the relevant time

1 period, Respondent Borazghi was not licensed by the Department to conduct business as a mortgage  
2 broker or loan originator.

3 **1.2 Unlicensed Activity.** Between at least February 5, 2013, and December 3, 2013, Respondents  
4 offered residential mortgage loan modification services to at least two Washington consumers, D.M.,  
5 and P.J., on property located in Washington State. Respondent Secure entered into a contractual  
6 relationship with at least one consumer, D.M., to provide those services and collected an advance fee<sup>1</sup>  
7 for the provision of those services in the amount of \$1,500.

8 **1.3 Misrepresentations and Omissions.** Respondents represented that they were licensed to  
9 provide the residential mortgage loan modification services or omitted disclosing that they were not  
10 licensed to provide those services.

11 **1.4 False Statements to the Department.** On or about September 9, 2013, Respondent Borazghi  
12 provided a response to the Department asserting that Respondents had provided residential loan  
13 modification services to D.M. in error, and that Respondents “do not, will not, and will never” provide  
14 residential mortgage loan modification services in Washington. However, the Department received a  
15 subsequent complaint alleging that Respondent Borazghi d/b/a Homeowner Protection Alliance had  
16 offered to provide residential loan modification services to Washington consumer P.J. on or about  
17 December 3, 2013.

18 **1.5 Failure to Comply with Director’s Authority.** On or about September 3, 2013, and February  
19 12, 2014, the Department served Respondents with subpoenas compelling Respondents to provide  
20 information regarding Respondents’ residential mortgage loan modification activities. As of the date  
21 of the Statement of Charges, Respondents have never provided a complete response to either  
22 subpoena.

23  
24 <sup>1</sup> Respondents refunded the advance fee to D.M.



1 **1.6 On-Going Investigation.** The Department's investigation into the alleged violations of the  
2 Act by Respondents continues to date.

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

4 **2.1 Definition of Mortgage Broker.** Pursuant to RCW 19.146.010(14) and WAC 208-660-006,  
5 "Mortgage Broker" means any person who, for compensation or gain, or in the expectation of  
6 compensation or gain (a) assists a person in obtaining or applying to obtain a residential mortgage loan  
7 or (b) holds himself or herself out as being able to make a residential mortgage loan or assist a person  
8 in obtaining or applying to obtain a residential mortgage loan. Pursuant to WAC 208-660-006, a  
9 person "'assists a person in obtaining or applying to obtain a residential mortgage loan' by, among  
10 other things, counseling on loan terms (rates, fees, other costs), [and] preparing loan packages...."

11 **2.2 Definition of Loan Originator.** Pursuant to RCW 19.146.010(11) and WAC 208-660-006,  
12 "Loan originator" means a natural person who for direct or indirect compensation or gain, or in the  
13 expectation of direct or indirect compensation or gain: takes a residential mortgage loan application  
14 for a mortgage broker; offers or negotiates terms of a mortgage loan; or holds themselves out to the  
15 public as able to perform any of these activities.

16 **2.3 Definition of Residential Mortgage Loan Modification.** Pursuant to RCW 19.146.010(20)  
17 and WAC 208-660-006, "Residential mortgage loan modification" means a change in one or more of a  
18 residential mortgage loan's terms or conditions. Changes to a residential mortgage loan's terms or  
19 conditions include but are not limited to forbearances, repayment plans, changes in interest rates, loan  
20 terms, or loan types, capitalization of arrearages, or principal reductions.

21 **2.4 Definition of Residential Mortgage Loan Modification Services.** Pursuant to RCW  
22 19.146.010(21) and WAC 208-660-006, "Residential mortgage loan modification services" includes  
23 negotiating, attempting to negotiate, arranging, attempting to arrange, or otherwise offering to perform  
24 a residential mortgage loan modification. "Residential mortgage loan modification services" also

1 includes the collection of data for submission to any entity performing mortgage loan modification  
2 services.

3 **2.5 Requirement to Obtain and Maintain Mortgage Broker License.** Based on the Factual  
4 Allegations set forth in Section I above, Respondents are in apparent violation of RCW 19.146.200(1)  
5 and WAC 208-660-155 for engaging in the business of a mortgage broker for Washington residents  
6 without first obtaining and maintaining a license under the Act.

7 **2.6 Requirement to Obtain and Maintain Loan Originator License.** Based on the Factual  
8 Allegations set forth in Section I above, Respondent Borazghi is in apparent violation of RCW  
9 19.146.200(1) and WAC 208-660-155 for engaging in the business of a loan originator for  
10 Washington residents without first obtaining and maintaining a license under the Act.

11 **2.7 Prohibited Acts.** Based on the Factual Allegations set forth in Section I above, Respondents  
12 are in apparent violation of RCW 19.146.0201(2) & (3) for engaging in an unfair or deceptive practice  
13 toward any person and obtaining property by fraud or misrepresentation.

14 **2.8 False Statements.** Based on the Factual Allegations set forth in Section I above, Respondents  
15 are in apparent violation of RCW 19.146.0201(8) for making a false statement in connection with an  
16 investigation conducted by the Department.

17 **2.9 Requirement to Comply with Director's Authority.** Based on the Factual Allegations set  
18 forth in Section I above, Respondents are in apparent violation of RCW 19.146.235 for failing to  
19 comply with the Director's investigation authority.

### 20 **III. AUTHORITY TO IMPOSE SANCTIONS**

21 **3.1 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 the Act for any violation of RCW 19.146.0201(1) through (9) or (13), or RCW  
24 19.146.200.

1 **3.2 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 **3.3 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 **3.4 Authority to Collect Investigation Fee.** Pursuant to RCW 19.146.228(2), WAC 208-660-  
6 520(9) & (11) and WAC 208-660-550(4)(a), the Department will charge forty-eight dollars per hour  
7 for an examiner's time devoted 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,  
10 as set forth above constitute a basis for the entry of an Order under RCW 19.146.220, RCW  
11 19.146.221, and RCW 19.146.223. Therefore, it is the Director's intent to ORDER that

12 **4.1** Respondents Secure Settlement, Inc. and Benjamin Borazghi be prohibited from participation  
13 in the conduct of the affairs of any mortgage broker subject to licensure by the Director, in any  
manner, for a period of five years.

14 **4.2** Respondents Secure Settlement, Inc. and Benjamin Borazghi jointly and severally pay  
15 restitution to each Washington consumer with whom they entered into a contract for residential  
16 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.

17 **4.3** Respondents Secure Settlement, Inc. and Benjamin Borazghi jointly and severally pay a fine,  
18 which, as of the date of this Statement of Charges, totals \$12,000.

19 **4.4** Respondents Secure Settlement, Inc. and Benjamin Borazghi jointly and severally pay an  
investigation fee which, as of the date of this Statement of Charges, totals \$2,457.60.

20 **4.5** Respondents Secure Settlement, Inc. and Benjamin Borazghi maintain records in compliance  
21 with the Act and provide the Department with the location of the books, records and other  
22 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.

23 //

24 //

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  
8 Dated this 17th day of July, 2014.



9 [Redacted Signature]  
10  
11 DEBORAH BORTNER  
12 Director, Division of Consumer Services  
13 Department of Financial Institutions  
14

15 Presented by:

16 [Redacted Signature]

17  
18 RACHELLE VILLALOBOS  
19 Financial Legal Examiner

20 Approved by:

21 [Redacted Signature]

22 CHARLES E. CLARK  
23 Enforcement Chief  
24

**STATE OF WASHINGTON  
DEPARTMENT OF FINANCIAL INSTITUTIONS  
CONSUMER SERVICES DIVISION**

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

SECURE SETTLEMENT, INC. d/b/a NATIONAL  
HOUSING ADVOCATES, and BENJAMIN  
BORAZGHI, President,

Respondents.

C-14-1446-14-TD01

TEMPORARY ORDER TO  
CEASE AND DESIST

THE STATE OF WASHINGTON TO:

Secure Settlement, Inc. d/b/a National  
Housing Advocates  
Benjamin Borazghi

COMES NOW the Director of the Washington State Department of Financial Institutions  
(Director), by and through his designee Deborah Bortner, Division Director, Division of Consumer  
Services, and finding that the public is likely to be substantially injured by delay in issuing a cease and  
desist order, enters this Temporary Order to Cease and Desist pursuant to chapter 19.146 RCW, the  
Mortgage Broker Practices Act (Act), based on the following:

**I. FACTUAL FINDINGS**

**1.1 Respondents.**

**A.** Secure Settlement, Inc. (Respondent Secure) is a corporation registered with the  
California Secretary of State. Respondent Secure has never been licensed by the Department of  
Financial Institutions of the State of Washington (Department) to conduct business as a mortgage  
broker.

**B.** Benjamin Borazghi (Respondent Borazghi) is the President of Respondent Secure.  
Respondent Borazghi also apparently does business as Homeowner Protection Alliance. During

1 the relevant time period, Respondent Borazghi was not licensed by the Department to conduct  
2 business as a mortgage broker or loan originator.

3 **1.2 Unlicensed Conduct.**

4 **A.** On or about February 5, 2013, Respondent Secure entered into a contractual relationship  
5 with Washington resident D.M. to perform residential mortgage loan modification services. D.M.  
6 paid Respondent Secure an advance fee for the provision of those services in the amount of  
7 \$1,500.

8 **B.** On or about September 9, 2013, Respondent Borazghi provided a statement to the  
9 Department's subpoena in which he asserted that Respondents had provided residential loan  
10 modification services to D.M. in error, and that Respondents "do not, will not, and will never"  
11 provide residential mortgage loan modification services in Washington.

12 **C.** On or about December 3, 2013, Respondent Borazghi d/b/a Homeowner Protection  
13 Alliance offered residential mortgage loan modification services to Washington resident P.J.

14 **D.** The Department has determined that the CommerceWest Bank NA account that D.M.'s  
15 advance fee was paid to is registered to Respondents Secure and Borazghi. The account was  
16 opened June 30, 2012, and was still an active account as of July 1, 2013.

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

18 **2.1 Failure to Obtain License.** Based on the Factual Allegations set forth in Section I above,  
19 Respondents are in apparent violation of RCW 19.146.200 for engaging in the business of a  
20 mortgage broker or loan originator without first obtaining a license under the Act.

21 **2.2 False Statements.** Based on the Factual Allegations set forth in Section I above,  
22 Respondents are in apparent violation of RCW 19.146.0201(8) for making a false statement in  
23 connection with an investigation conducted by the Department.

24 //  
TEMPORARY ORDER TO CEASE AND DESIST  
C-14-1446-14-TD01  
SECURE SETTLEMENT, INC. D/B/A NATIONAL  
HOUSING ADVOCATES, AND BENJAMIN BORAZGHI,  
PRESIDENT

1           **III. AUTHORITY TO ISSUE TEMPORARY ORDER TO CEASE AND DESIST**

2   **3.1 Authority to Issue Temporary Order to Cease and Desist.** Pursuant to RCW 19.146.227,  
3 the Director is authorized to issue a temporary order to cease and desist whenever the Director  
4 determines that the public is likely to be substantially injured by delay in issuing a cease and desist  
5 order. Based on the Factual Findings and Grounds for Entry of Order set forth above, Respondents  
6 engaged in the business of a Mortgage Broker or Loan Originator without proper licensure and  
7 failed to comply with its statements to the Department that it would cease accepting new clients  
8 and the public is likely to be substantially injured due to Respondents' disregard for the applicable  
9 laws.

10                           **IV. ORDER**

11           Based on the above Factual Findings, Grounds for Entry of Order, and Authority to Issue  
12 Temporary Order to Cease and Desist, and pursuant to RCW 19.146.227, the Director determines  
13 that the public is likely to be substantially harmed by a delay in entering a cease and desist order.  
14 Therefore, the Director ORDERS that:

15   **4.1** Respondents shall immediately cease and desist from participating in the conduct of the affairs  
16 of any mortgage broker or loan originator subject to licensure by the Director, in any manner,  
17 specifically including but not limited to negotiating any terms of a residential mortgage loan,  
18 performing any loan modification services, or holding out as able to assist or perform any of the  
19 above listed services.

20   **4.2** This order shall take effect immediately and shall remain in effect unless set aside, limited, or  
21 suspended in writing by an authorized court.

22                           **NOTICE**

23           PURSUANT TO CHAPTER 19.146 RCW, YOU ARE ENTITLED TO A HEARING TO  
24 DETERMINE WHETHER THIS ORDER SHALL BECOME PERMANENT. IF YOU DESIRE

TEMPORARY ORDER TO CEASE AND DESIST  
C-14-1446-14-TD01  
SECURE SETTLEMENT, INC. D/B/A NATIONAL  
HOUSING ADVOCATES, AND BENJAMIN BORAZGHI,  
PRESIDENT

1 A HEARING, YOU MUST COMPLETE AND RETURN THE ATTACHED APPLICATION  
2 FOR ADJUDICATIVE HEARING.

3 **FAILURE TO COMPLETE AND RETURN THE APPLICATION FOR**  
4 **ADJUDICATIVE HEARING SO THAT IT IS RECEIVED BY THE DEPARTMENT**  
5 **WITHIN 20 DAYS OF THE DATE THAT THIS ORDER WAS SERVED ON YOU WILL**  
6 **CONSTITUTE A DEFAULT, AND WILL RESULT IN THE LOSS OF YOUR RIGHT TO**  
7 **A HEARING.**

8 SERVICE ON YOU IS DEFINED AS POSTING IN THE U.S. MAIL, POSTAGE  
9 PREPAID, TO YOUR LAST KNOWN ADDRESS, A COPY OF THIS TEMPORARY CEASE  
10 AND DESIST ORDER, NOTICE OF OPPORTUNITY TO DEFEND AND OPPORTUNITY  
11 FOR HEARING, AND APPLICATION FOR ADJUDICATIVE HEARING. BE ADVISED  
12 THAT DEFAULT WILL RESULT IN THIS TEMPORARY ORDER TO CEASE AND DESIST  
13 BECOMING PERMANENT ON THE 21<sup>ST</sup> DAY FOLLOWING SERVICE OF THIS ORDER  
14 UPON YOU.

15 WITHIN TEN DAYS AFTER YOU HAVE BEEN SERVED WITH THIS TEMPORARY  
16 ORDER TO CEASE AND DESIST, YOU MAY APPLY TO THE SUPERIOR COURT IN THE  
17 COUNTY OF YOUR PRINCIPAL PLACE OF BUSINESS FOR AN INJUNCTION SETTING  
18 ASIDE, LIMITING, OR SUSPENDING THIS ORDER PENDING THE COMPLETION OF THE  
19 ADMINISTRATIVE PROCEEDINGS PURSUANT TO THIS NOTICE.

20 DATED this 7<sup>th</sup> day of July, 2014.



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

//  
TEMPORARY ORDER TO  
C-14-1446-14-TD01  
SECURE SETTLEMENT, INC. L/H A. A. A.  
HOUSING ADVOCATES, AND BENJAMIN BORAZGHI,  
PRESIDENT



1 Presented by:

2 [REDACTED]

3 RACHELLE VILLALOBOS  
4 Financial Legal Examiner

5 Approved by:

6 [REDACTED]

7 CHARLES E. CLARK  
8 Enforcement Chief