

ORDER SUMMARY – Case Number: C-15-1620

Name(s): Renaissance Legal Group Inc. d/b/a Salvation Law Group, and Ronny Mor,
President/Secretary

Order Number: C-15-1620-15-FO01

Effective Date: December 29, 2015

License Number: Unlicensed - n/a
Mor NMLS ID# 1507909, Renaissance Legal Group NMLS ID# 1529911

Or NMLS Identifier

License Effect: n/a

Not Apply Until: December 29, 2020

Not Eligible Until: December 29, 2020

Prohibition/Ban Until: December 29, 2020

Investigation Costs	\$285.60	Due	Paid <input type="checkbox"/> Y <input checked="" type="checkbox"/> N	Date
Fine	\$6,000	Due	Paid <input type="checkbox"/> Y <input checked="" type="checkbox"/> N	Date
Assessment(s)	\$	Due	Paid <input type="checkbox"/> Y <input type="checkbox"/> N	Date
Restitution	\$7,000	Due	Paid <input type="checkbox"/> Y <input checked="" type="checkbox"/> N	Date
Judgment	\$	Due	Paid <input type="checkbox"/> Y <input type="checkbox"/> N	Date
Satisfaction of Judgment Filed?		<input type="checkbox"/> Y <input type="checkbox"/> N		
No. of Victims:		2		

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

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

No.: C-15-1620-15-FO01

FINAL ORDER

RENAISSANCE LEGAL GROUP, INC.
D/B/A SALVATION LAW GROUP, and
RONNY MOR, President/Secretary,

Respondents.

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I. DIRECTOR'S CONSIDERATION

A. Default. This matter has come before the Director of the Department of Financial Institutions of the State of Washington (Director), through his designee, Consumer Services Division Director Charles E. Clark (Director's Designee), pursuant to RCW 34.05.440(1). On July 10, 2015, the Director, through the Director's Designee, issued a Statement of Charges and Notice of Intention to Enter an Order to Prohibit from Industry, Order Restitution, Impose Fine, and Collect Investigation Fee (Statement of Charges) against Renaissance Legal Group, Inc. d/b/a Salvation Law Group; and Ronny Mor, President/Secretary (Respondents). A copy of the Statement of Charges is attached and incorporated into this order by this reference. The Statement of Charges was accompanied by a cover letter dated July 10, 2015, a Notice of Opportunity to Defend and Opportunity for Hearing, and blank Applications for Adjudicative Hearing for Respondents (collectively, accompanying documents).

On July 10, 2015, the Department served Respondents with the Statement of Charges and accompanying documents by First-Class mail and Federal Express overnight delivery. The documents sent by Federal Express overnight delivery were delivered on July 13, 2015. The documents served by First-Class mail were not returned to the Department as undeliverable.

1 Neither Respondent requested an adjudicative hearing within twenty calendar days after the
2 Department served the Notice of Opportunity to Defend and Opportunity for Hearing, as provided for
3 in WAC 208-08-050(2).

4 B. Record Presented. The record presented to the Director's Designee for his review and
5 for entry of a final decision included the following:

- 6 1. Statement of Charges, cover letter dated July 10, 2015, Notice of Opportunity to
7 Defend and Opportunity for Hearing, and blank Applications for Adjudicative
8 Hearing for Respondents, with documentation for service.
- 9 2. Post Office Address Verification Request form completed by San Diego,
10 California 92101 Branch Office of the United States Post Office, received by the
11 Department on August 5, 2015.
- 12 3. Federal Express Overnight Mail verification of delivery received by the
13 Department on July 13, 2015.

14 C. Factual Findings and Grounds for Order. Pursuant to RCW 34.05.440(1), the
15 Director's Designee hereby adopts the Statement of Charges, which is attached hereto.

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1 II. FINAL ORDER

2 Based upon the foregoing, and the Director's Designee having considered the record and
3 being otherwise fully advised, NOW, THEREFORE:

4 A. IT IS HEREBY ORDERED, That:

- 5 1. Respondent Renaissance Legal Group, Inc. d/b/a Salvation Law Group cease and desist
6 engaging in the business of a mortgage broker in the State of Washington or involving
7 Washington property or Washington residents.
- 8 2. Respondent Ronny Mor cease and desist engaging in the business of a loan originator in the
9 State of Washington.
- 10 3. Respondents Renaissance Legal Group, Inc. d/b/a Salvation Law Group and Ronny Mor are
11 prohibited from participation, in any manner, in the conduct of the affairs of any mortgage
12 broker subject to licensure by the Director for a period of five years.
- 13 4. Respondents Renaissance Legal Group, Inc. d/b/a Salvation Law Group and Ronny Mor
14 jointly and severally pay restitution to the two (2) consumers identified by the Department in
15 the Statement of Charges as follows: M.K., in the amount of \$3,500; and A.Y. in the amount
16 of \$3,500.
- 17 5. Respondents Renaissance Legal Group, Inc. d/b/a Salvation Law Group and Ronny Mor
18 jointly and severally pay a fine of \$6,000.
- 19 6. Respondents Renaissance Legal Group, Inc. d/b/a Salvation Law Group and Ronny Mor
20 jointly and severally pay an investigation fee in the amount of \$285.60.
- 21 7. Respondents Renaissance Legal Group, Inc. d/b/a Salvation Law Group and Ronny Mor
22 maintain records in compliance with the Act and provide the Department with the location of
23 the books, records and other information relating to Respondents' provision of residential
24 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
RCW 19.146 (the Mortgage Broker Practices Act).

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1 B. Reconsideration. Pursuant to RCW 34.05.470, Respondents have the right to file a
2 Petition for Reconsideration stating the specific grounds upon which relief is requested. The Petition
3 must be filed in the Office of the Director of the Department of Financial Institutions by courier at
4 150 Israel Road SW, Tumwater, Washington 98501, or by U.S. Mail at P.O. Box 41200, Olympia,
5 Washington 98504-1200, within ten (10) days of service of the Final Order upon Respondents. The
6 Petition for Reconsideration shall not stay the effectiveness of this order nor is a Petition for
7 Reconsideration a prerequisite for seeking judicial review in this matter.

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

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

14 D. Judicial Review. Respondents have the right to petition the superior court for judicial
15 review of this agency action under the provisions of chapter 34.05 RCW. For the requirements for
16 filing a Petition for Judicial Review, see RCW 34.05.510 and sections following.

17 E. Non-compliance with Order. If you do not comply with the terms of this order,
18 **including payment of any amounts owed within 30 days of receipt of this order**, the Department
19 may seek its enforcement by the Office of the Attorney General to include the collection of the fines,
20 fees, and restitution imposed herein. The Department also may assign the amounts owed to a
21 collection agency for collection.

1 F. Service. For purposes of filing a Petition for Reconsideration or a Petition for Judicial
2 Review, service is effective upon deposit of this order in the U.S. mail, declaration of service
3 attached hereto.

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5 DATED this 29th day of December, 2015.



STATE OF WASHINGTON
DEPARTMENT OF FINANCIAL INSTITUTIONS

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CHARLES E. CLARK
Director
Division of Consumer Services

1 in Washington State. Respondents entered into a contractual relationship with at least two (2)
2 Washington consumers to provide those services and collected an advance fee for the provision of
3 those services. The Department has received at least two (2) complaints from Washington consumers
4 alleging Respondents provided or offered to provide residential mortgage loan modification services
5 while not licensed by the Department to provide those services. Consumer M.K. paid Respondents
6 \$3,500 for loan modification services and consumer A.Y. paid Respondents \$3,500.00 for loan
7 modification services.

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

11 **1.4 On-Going Investigation.** The Department's investigation into the alleged violations of the
12 Act by Respondents continues to date.

13 II. GROUNDS FOR ENTRY OF ORDER

14 **2.1 Mortgage Broker Defined.** Pursuant to RCW 19.146.010(14) and WAC 208-660-006, in
15 relevant part, "Mortgage broker" means any person who for direct or indirect compensation or gain, or
16 in the expectation of direct or indirect compensation or gain (a) performs residential mortgage loan
17 modification services or (b) holds himself or herself out as being able to provide residential mortgage
18 loan modification services. Pursuant to WAC 208-660-006, a person "holds himself or herself out" by
19 advertising or otherwise informing the public that they engage in any of the activities of a mortgage
20 broker or loan originator, including the use of business cards, stationery, brochures, rate sheets, or
21 other promotional items.

22 **2.2 Loan Originator Defined.** Pursuant to RCW 19.146.010(11)(b), "Loan originator" means a
23 natural person who for direct or indirect compensation or gain or in the expectation of direct or
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1 indirect compensation or gain performs residential mortgage loan modification services or holds
2 himself or herself out as being able to perform residential mortgage loan modification services.

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, Respondent Mor is in apparent violation of RCW
8 19.146.200(1) for engaging in the business of a mortgage broker for Washington residents or property
9 without first 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, Respondent Mor is in apparent violation of RCW
12 19.146.200(1) for engaging in the business of a loan originator without first obtaining and maintaining
13 a license.

14 **2.6 Prohibition against Taking Advance Fees.** Based on the Factual Allegations set forth in
15 Section I above, Respondents are in apparent violation of RCW 19.146.0201(11) and RCW 19.146.353
16 for taking advance fees for loan modification services.

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.

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

2 Respondents' violations of the provisions of chapter 19.146 RCW, as set forth above constitute a
3 basis for the entry of an Order under RCW 19.146.220, RCW 19.146.221, and RCW 19.146.223.

4 Therefore, it is the Director's intent to ORDER that:

- 5 **4.1** Respondent Renaissance Legal Group Inc d/b/a Salvation Law Group cease and desist
6 engaging in the business of a mortgage broker in the State of Washington or involving
7 Washington property or Washington residents.
- 8 **4.2** Respondent Mor cease and desist engaging in the business of a loan originator in the State of
9 Washington.
- 10 **4.3** Respondents Renaissance Legal Group Inc d/b/a Salvation Law Group and Ronny Mor be
11 prohibited from participation, in any manner, in the conduct of the affairs of any mortgage
12 broker subject to licensure by the Director for a period of five years.
- 13 **4.4** Respondents Renaissance Legal Group Inc d/b/a Salvation Law Group and Ronny Mor jointly
14 and severally pay restitution to the two (2) consumers identified by the Department in
15 paragraph 1.2 in the amount set forth therein, and that Respondents jointly and severally pay
16 restitution to each Washington consumer with whom they entered into a contract for residential
17 mortgage loan modification services related to real property or consumers located in the state
18 of Washington equal to the amount collected from that Washington consumer for those
19 services in an amount to be determined at hearing.
- 20 **4.5** Respondents Renaissance Legal Group Inc d/b/a Salvation Law Group and Ronny Mor jointly
21 and severally pay a fine, which as of the date of this Statement of Charges totals \$6,000.
- 22 **4.6** Respondents Renaissance Legal Group Inc d/b/a Salvation Law Group and Ronny Mor jointly
23 and severally pay an investigation fee, which as of the date of this Statement of Charges totals
24 \$285.60.
- 4.7** Respondents Renaissance Legal Group Inc d/b/a Salvation Law Group and Ronny Mor
maintain records in compliance with the Act and provide the Department with the 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.

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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.

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10 Dated this 10th day of July, 2015.



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[Redacted Signature]

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

Presented by:

[Redacted Signature]

WILMA M. COLWELL
Financial Examiner

Approved by:

[Redacted Signature]

STEVEN C. SHERMAN
Enforcement Chief