

## ORDER SUMMARY – Case Number: C-16-2037

<b>Name(s):</b>	CentralBanc Mortgage Corporation (CBMC) John W. Delaney, President and CEO John C. Dolan, Executive VP and Loan Originator
<b>Order Number:</b>	C-16-2037-17-CO02
<b>Effective Date:</b>	12/6/17
<b>License Number:</b>	CBMC: NMLS No. 55244 John W. Delaney: NMLS 102468 John C. Dolan: NMLS No. 102966
<b>License Effect:</b>	CBMC: Revocation stayed for two years contingent upon compliance with the Consumer Loan Act, related Rules, and the Consent Order.
<b>Prohibition:</b>	John W. Delaney: Prohibition stayed for two years contingent upon compliance with the Consumer Loan Act, related Rules, and the Consent Order from participating, in any capacity, in the conduct of the affairs of any consumer loan company or mortgage broker licensed by, or subject to licensure or regulation by, the Department

<b>Investigation Costs</b>	\$ 10,000	Due: Upon entry	Paid: <input checked="" type="checkbox"/> Y <input type="checkbox"/> N	Date: 11/27/17
<b>Fine</b>	\$ 75,000 paid \$ 75,000 stayed	Due: Over time	Paid: <input type="checkbox"/> Y <input checked="" type="checkbox"/> N	Date: N/A

**Comments:** Mr. Delaney admitted that he failed to supervise two other Respondents, and further admitted that the structure of CBMC may have contributed to the violations found in the Report of Examination (ROE) that formed the basis for the Charges. With those exceptions, Mr. Delaney neither admits nor denies the Factual Allegations in the Charges... .

Respondent CBMC agreed to a compliance examination at its costs within two years and to certain affirmative actions designed to prevent repeat violations of the Act and Rules.

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  
5 Consumer Loan Act of Washington by:

6 CENTRALBANC MORTGAGE CORPORATION, a  
Washington Consumer Loan Company, NMLS No. 55244;  
7 JOHN W. DELANEY, President and Chief Executive Officer,  
NMLS No. 102468;  
8 JOHN C. DOLAN, Executive Vice President and Mortgage  
Loan Originator, NMLS No. 102966;  
9 KAREN A. REYES, Production Manager and Mortgage Loan  
Originator, NMLS No. 239804; and  
10 BRETT T. GREEN, Mortgage Loan Originator,  
NMLS No. 114787.

11 Respondents.

No.: C-16-2037-17-CO02

CONSENT ORDER AS TO CENTRALBANC  
MORTGAGE CORPORATION AND  
JOHN W. DELANEY, AND WITHDRAWING  
STATEMENT OF CHARGES AS TO  
JOHN C. DOLAN

12 COME NOW the Director of the Department of Financial Institutions (Director), through her designee  
13 Charles E. Clark, Division Director, Division of Consumer Services, and CentralBanc Mortgage Corporation  
14 (Respondent CentralBanc) and John W. Delaney (Respondent Delaney), by and through their attorney, Seth A.  
15 Rosenberg, and John C. Dolan (Respondent Dolan), by and through his attorney, Christopher A. Campbell, and  
16 finding that the issues raised in the above-captioned matter may be economically and efficiently settled, agree to  
17 the entry of this Consent Order. This Consent Order is entered pursuant to chapter 31.04 of the Revised Code of  
18 Washington (RCW), and RCW 34.05.060 of the Administrative Procedure Act, based on the following:

19 **AGREEMENT AND ORDER**

20 The Department of Financial Institutions, Division of Consumer Services (Department) and Respondents,  
21 and Respondent Dolan, have agreed upon a basis for resolution of the matters alleged in the attached Statement of  
22 Charges No. C-16-2037-17-SC01 (Charges), entered March 31, 2017. Pursuant to chapter 31.04 RCW, the  
23 Consumer Loan Act (Act), and RCW 34.05.060 of the Administrative Procedure Act, the parties hereby agree to  
24 the Department's entry of this Consent Order and intend this Consent Order to fully resolve the Charges.

25 Based upon the foregoing:

1           **A. Withdrawal of Charges.** It is AGREED that the Department hereby withdraws the Charges as to  
2 Respondent Dolan.

3           **B. Jurisdiction.** It is AGREED that Respondent CentralBanc and Respondent Delaney (collectively,  
4 Respondents), consent to the Department’s jurisdiction over the subject matter of the activities discussed herein.

5           **C. Waiver of Hearing.** It is AGREED that Respondents have been informed of their right to a hearing  
6 before an administrative law judge, and hereby waive their rights to a hearing and any and all administrative and  
7 judicial review of the issues raised in this matter, or of the resolution reached herein. Respondents, by their  
8 signatures and the signatures of their representative below, withdraw their appeals.

9           **D. Admissions.** It is AGREED that Respondent Delaney admits that he failed to supervise Respondent  
10 Green and Respondent Reyes, and further admits that the structure of Respondent CentralBanc may have  
11 contributed to the violations found in the Report of Examination (ROE) that formed the basis for the Charges. It is  
12 FURTHER AGREED that with those above exceptions, Respondent Delaney neither admits nor denies the Factual  
13 Allegations in the Charges, and will not take any action or permit to be made any public statement creating the  
14 impression that either the Charges or this Consent Order are without factual basis. Nothing in this paragraph affects  
15 Respondent Delaney’s right to take legal or factual positions in defense of litigation.

16           **E. Cease and Desist and Future Compliance with the Act.** It is AGREED that Respondent Delaney has  
17 represented and warranted to the Department that Respondents have ceased and desisted from the alleged  
18 violations of the Act enumerated in the Charges and the ROE. It is FURTHER AGREED AND ORDERED that  
19 Respondents shall henceforth comply with the Act and associated Rules found in WAC 208-620 (Rules).

20           **F. Consumer Loan Company License Revocation (Stayed).** It is AGREED AND ORDERED that, for a  
21 period of two (2) years from the date of entry of this Consent Order, Respondent CentralBanc’s consumer loan  
22 company license is revoked. It is FURTHER AGREED that the revocation of Respondent CentralBanc’s consumer  
23 loan company license shall be stayed for two (2) years (the Stayed Revocation) contingent on Respondents’  
24 compliance with the Act, Rules, and this Consent Order.

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1           **G. Prohibition from Industry (Stayed).** It is AGREED AND ORDERED that, for a period of two (2)  
2 years from the date of entry of this Consent Order, Respondent Delaney is prohibited from participating, in any  
3 capacity, in the conduct of the affairs of any consumer loan company or mortgage broker licensed by, or subject to  
4 licensure or regulation by, the Department. It is FURTHER AGREED that the prohibition of Respondent Delaney  
5 shall be stayed for two (2) years (the Stayed Prohibition) contingent on Respondents' compliance with the Act,  
6 Rules, and this Consent Order.

7           **H. Fine (Partially Stayed).** It is AGREED AND ORDERED that Respondents are liable to the Department  
8 for a fine in the amount of \$300,000. In consideration of this settlement, it is FURTHER AGREED that  
9 Respondents shall pay a \$150,000 fine, with \$75,000 of that amount (the Paid Fine) paid pursuant to Paragraph N.  
10 The \$75,000 balance of the fine shall be stayed for two (2) years (the Stayed Fine) from the date of entry of this  
11 Consent Order contingent on Respondents' compliance with the Act, Rules, and this Consent Order.

12           **I. Compliance Examination.** It is AGREED AND ORDERED that within two (2) years of the entry of  
13 this Consent Order, the Department will conduct a compliance examination of Respondent CentralBanc at  
14 Respondents' cost. The purpose of the examination shall be to ascertain compliance with the Act, Rules, this  
15 Consent Order, and all applicable state or federal laws and regulations relating to the activities governed by the  
16 Act. It is FURTHER AGREED AND ORDERED that an examination risk rating of four (4) or five (5) may result  
17 in the lifting of the Stayed Revocation, Stayed Prohibition, or Stayed Fine pursuant to Paragraph L.

18           **J. Affirmative Action.** It is AGREED AND ORDERED that Respondents shall take the following  
19 affirmative actions to prevent future violations and comply with the Act:

- 20           1. Within one (1) month of entry of this Consent Order, appoint a Department-licensed mortgage loan  
21           originator with supervisory responsibilities (Supervisor) for all licensed mortgage loan originators,  
22           loan processors, and loan underwriters employed by or contracted with Respondent CentralBanc,  
23           and provide written notice to the Department providing the Supervisor's job title, position  
24           description, compensation agreement, and resume;
- 25           2. Within two (2) months of entry of this Consent Order, retain an independent auditor (Auditor) to  
            review, in conjunction with the Supervisor, Respondent CentralBanc's existing supervisory  
            systems and residential mortgage lending compliance policies and procedures;

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- 1 3. Require the Auditor and Supervisor to, within four (4) months of entry of this Consent Order, file  
2 a joint report (Report) with the Department making recommendations for new or revised  
3 supervisory systems and residential mortgage lending compliance policies and procedures. The  
4 revised supervisory systems and compliance policies and procedures must include operational  
5 oversight of Respondent CentralBanc's advertising, origination, processing, and back-office  
6 activities, and a permanent loan compliance review program (Program) to review residential  
7 mortgage loans for compliance with the Act, Rules, and applicable state and federal laws and rules.  
8 The Program may be done internally by the Compliance Department (either manually or by using  
9 dedicated loan compliance software) or by an external auditor.
- 10 4. Within two (2) months of receipt of the Report, implement the Report's recommendations and  
11 provide written notice to the Department providing a copy of the revised supervisory systems and  
12 mortgage lending compliance policies and procedures, including the Program description.

13 **K. Expiration of Stayed Revocation, Prohibition, and Fine.** It is AGREED AND ORDERED that absent  
14 an action by the Department to lift the stays pursuant to Paragraph L, the Stayed Revocation, Stayed Prohibition,  
15 and Stayed Fine shall expire two (2) years from the date of entry of this Consent Order.

16 **L. Lifting of Stays.** It is AGREED AND ORDERED that:

- 17 1. During the two-year Stayed Revocation, Stayed Prohibition, and Stayed Fine, if the Department  
18 determines Respondents have not complied with the Act, Rules, this Consent Order, or applicable  
19 state and federal laws and regulations, or if Respondent CentralBanc receives an examination  
20 risk rating of four (4) or five (5), and the Department seeks to lift any or all of the stays, the  
21 Department will first serve Respondents with a written notice of alleged noncompliance.
- 22 2. The Department's written notice of alleged noncompliance will include:
- 23 a. A description of the alleged noncompliance;
  - 24 b. A statement that the Department seeks to lift the stays and impose the Stayed Revocation,  
25 Stayed Prohibition, and/or Stayed Fine;
  - 26 c. Notice that Respondents can contest the notice of alleged noncompliance by either requesting  
27 an adjudicative hearing or, in lieu thereof, by submitting a written response to the Department  
28 contesting the alleged noncompliance; and
  - 29 d. Notice that the process for lifting the stays applies only to this Consent Order.
- 30 3. Respondents have twenty (20) days from the date of service of the notice of alleged  
31 noncompliance to submit a written request to the Department for an adjudicative hearing or, in  
32 lieu thereof, a written response to the Department contesting the alleged noncompliance.
- 33 4. If requested, the scope and issues of the adjudicative hearing will be limited solely to whether or  
34 not Respondents are in violation of the terms of the Act, Rules, this Consent Order, or that  
35 Respondents received an examination risk rating of four (4) or five (5).

- 1           5. At the conclusion of the adjudicative hearing the hearing officer will issue an initial decision.  
2           Any party may file a Petition for Review of that initial decision with the Director.
- 3           6. In lieu of requesting an adjudicative hearing, within twenty (20) days from the date of service of  
4           the notice of alleged noncompliance, Respondents may submit a written response for  
5           consideration by the Department contesting the alleged noncompliance. The response must  
6           include each Respondent's waiver of the right to an adjudicative hearing, may address the alleged  
7           noncompliance, and may seek an alternative resolution to lifting any stays.
- 8           7. **Default.** If Respondents do not timely request an adjudicative hearing or submit a written  
9           response contesting the notice of alleged noncompliance, the Department may lift the stays and  
10          impose the Stayed Revocation, Stayed Prohibition, or Stayed Fine without further notice.

11          **M. Investigation Fee.** It is AGREED AND ORDERED that upon entry of this Consent Order Respondents  
12          shall pay to the Department an investigation fee of \$10,000 pursuant to Paragraph N.

13          **N. Payments.** It is AGREED AND ORDERED that Respondents shall pay the \$10,000 Investigation Fee  
14          to the Department upon entry of this Consent Order in the form of a cashier's check made payable to the  
15          "Washington State Treasurer." The \$75,000 Paid Fine shall be paid to the Department in twelve (12) equal monthly  
16          payments of \$6,250, with the first payment due the last business day of the month following entry of this Consent  
17          Order, and continuing until the Paid Fine is paid in full. Payments shall be made by cashier's check made payable  
18          to the "Washington State Treasurer," and shall be delivered to the Department so that they are received no later  
19          than the last business days of each succeeding month.

20          **O. Authority to Execute Order.** It is AGREED that Respondent Delaney has represented and warranted  
21          that he has the full power and right to execute this Consent Order on behalf of Respondent CentralBanc.

22          **P. Non-Compliance with Order.** It is AGREED that Respondents understand that failure to abide by the  
23          terms and conditions of this Consent Order may result in further legal action by the Director. In the event of such  
24          legal action, Respondents may be found liable to reimburse the Department for its investigation fees, costs, and  
25          expenses for investigating and prosecuting violations of the Act, Rules, and/or this Consent Order.

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

1 **R. Completely Read, Understood, and Agreed.** It is AGREED that Respondent Delaney, individually  
2 and as the authorized representative of respondent CentralBanc, has read this Consent Order in its entirety and  
3 fully understands and agrees to all of the same.

4 **RESPONDENTS:**

5 CentralBanc Mortgage Corporation  
6 By:

7 /s/ \_\_\_\_\_ 11-21-17  
8 John W. Delaney Date  
9 President and CEO, CentralBanc Mortgage Corporation

10 /s/ \_\_\_\_\_ 11-21-17  
11 John W. Delaney, Individually Date

12 Approved for Entry:

13 /s/ \_\_\_\_\_ 11-22-17  
14 Seth A. Rosenberg, Esq., WSBA No. 41660 Date  
15 The Rosenberg Law Group, PLLC  
16 Attorneys for CentralBanc Mortgage Corporation and John W. Delaney

17 /s/ \_\_\_\_\_ 11-21-17  
18 John C. Dolan Date  
19 Individually

20 Approved for Entry:

21 /s/ \_\_\_\_\_ 11-22-17  
22 Christopher A. Campbell, Esq., WSBA No50959 Date  
23 The Rosenberg Law Group, PLLC  
24 Attorneys for John C. Dolan

25 **DO NOT WRITE BELOW THIS LINE**

1 THIS ORDER ENTERED THIS 6<sup>th</sup> DAY OF DECEMBER 2017.

2  
3 \_\_\_\_\_/s/  
4 CHARLES E. CLARK  
5 Director, Division of Consumer Services  
6 Department of Financial Institutions  
7  
8

9 Presented by:

Approved By:

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11 \_\_\_\_\_/s/  
12 ANTHONY W. CARTER  
13 Senior Legal Examiner  
14 Division of Consumer Services  
15 Department of Financial Institutions  
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\_\_\_\_\_ /s/  
STEVEN C. SHERMAN  
Enforcement Chief  
Division of Consumer Services  
Department of Financial Institutions



1           **C. Respondent John Carroll Dolan** (Respondent Dolan), the Executive Vice President of Respondent  
2 CentralBanc, was licensed by the Department to conduct business as a MLO for Respondent CentralBanc on or  
3 about September 13, 2010, and has been continuously licensed to date.

4           **D. Respondent Karen Aragdon Reyes** (Respondent Reyes), the Production Manager for Respondent  
5 CentralBanc, was licensed by the Department to conduct business as a MLO for Respondent CentralBanc on or  
6 about January 11, 2013, and was continuously licensed by the Department through December 31, 2016, when the  
7 Department declined to renew her MLO license for 2017.

8           **E. Respondent Brett Todd Green** (Respondent Green), was licensed by the Department to conduct  
9 business as a MLO for Respondent CentralBanc on or about May 15, 2015, and was continuously sponsored by  
10 Respondent CentralBanc through November 3, 2016, when Respondent CentralBanc removed its sponsorship.

11 **1.2 False Statements and Omissions of Material Facts.** On or about May 31, 2016, the Department notified  
12 Respondent Delaney the Department had selected Respondent CentralBanc for an examination of its business  
13 practices and that the Department would utilize a secure cloud server, Box.com, to retrieve all examination-related  
14 documents. On or about July 21, 2016, the Department identified 25 residential mortgage loan files the Department  
15 intended to review during the examination. The Department further requested that by close of business on August  
16 4, 2016, Respondent Delaney upload complete copies of each requested loan file to an account on Box.com.

17           Between July 21, 2016, and August 4, 2016, in apprehension of the Department's examination, Respondent  
18 Reyes, acting on behalf of Respondent CentralBanc, forged and altered more than 100 loan disclosure documents  
19 that were either incomplete or completely missing from the requested loan files. Respondent Reyes subsequently  
20 added the forged and altered loan disclosure documents to the loan files and uploaded the loan files to the Box.com  
21 account created by the Department for Respondent CentralBanc's use. Respondent Reyes omitted to inform the  
22 Department that she had added forged and altered loan disclosure documents to the requested loan files.

23           On November 14, 2016, the Department took the testimony of Respondent Reyes pursuant to an  
24 investigation of Respondent CentralBanc. During Respondent Reyes' testimony she admitted to forging and  
25 altering loan disclosure documents; placing those forged and altered loan disclosure documents in the loan files the

1 Department had requested and intended to review; and uploaded the loan files containing the forged and altered  
2 loan disclosure documents to the Box.com account created by the Department for Respondent CentralBanc's use.

3 **1.3 2016 Examination.** From August 8, 2016, through August 12, 2016, the Department conducted an on-site  
4 compliance examination of Respondent CentralBanc at its office in Bellevue, Washington. During the examination  
5 the Department reviewed the requested loan files and identified the loan disclosure documents Respondent Reyes  
6 had forged and altered and added to the loan files.

7 **1.4 Incomplete and Inaccurate Disclosures.** Respondent CentralBanc failed to provide borrowers with  
8 complete and accurate Rate Lock Agreements; provided borrowers with loan disclosures containing blanks; failed  
9 to provide borrowers with a complete and accurate privacy policy disclosure; and failed to provide complete  
10 disclosures to borrowers whose loan applications had been denied.

11 **1.5 Failure to Preserve Records.** Respondent Delaney and Respondent CentralBanc failed to preserve all  
12 records, documents, files, and other relevant information required to be maintained under the Act.

13 **1.6 Unlicensed Activity.** While Respondent Green was sponsored by Respondent CentralBanc as a MLO,  
14 Respondent Green resided on the Kitsap Peninsula some 40 miles across Puget Sound from Respondent  
15 CentralBanc's office in Bellevue. Respondent Green originated more than 20 residential mortgage loans for  
16 Respondent CentralBanc from his home, an unlicensed location.

17 **1.7 Aiding and Abetting Unlicensed Activity.** Respondent Delaney, Respondent CentralBanc, and Respondent  
18 Dolan aided and abetted Respondent Green's unlicensed activity by permitting Respondent Green to originate  
19 residential mortgage loans from an unlicensed location, and by making loans to the borrowers contacted by  
20 Respondent Green from the unlicensed location.

21 **1.8 Failure to Properly Supervise.** Respondent Delaney and/or Respondent Dolan failed to properly supervise  
22 Respondent Reyes and Respondent Green.

23 **1.9 On-Going Investigation.** The Department's investigation into the alleged violations of the Act by  
24 Respondents continues to date.

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

2 **2.1 Definitions.**

3 **A. Borrower.** Pursuant to RCW 31.04.015(3) and WAC 208-620-010, a “borrower” means in part any  
4 person who retains a licensee in an effort to obtain a loan, regardless of whether that person actually obtains a loan.

5 **B. Making a Loan.** Pursuant to RCW 31.04.015(15) and WAC 208-620-010, "making a loan" means  
6 advancing, offering to advance, or making a commitment to advance funds to a borrower for a loan.

7 **C. Mortgage Loan Originator.** Pursuant to RCW 31.04.015(17) and WAC 208-620-010, "mortgage loan  
8 originator" means in part an individual who for compensation or gain (i) takes a residential mortgage loan  
9 application, or (ii) offers or negotiates terms of a residential mortgage loan.

10 **D. Residential Mortgage Loan.** Pursuant to RCW 31.04.015(25) and WAC 208-620-010, "residential  
11 mortgage loan" means in part any loan primarily for personal, family, or household use that is secured by a  
12 mortgage, deed of trust, or other equivalent consensual security interest on a dwelling or residential real estate  
13 upon which is constructed or intended to be constructed a dwelling.

14 **2.2 Responsibility and Liability for Violations.** Pursuant to WAC 208-620-378, Respondent Delaney,  
15 Respondent CentralBanc, and Respondent Dolan are responsible for ensuring their MLOs have sufficient  
16 knowledge and understanding of the Act and related rules, and pursuant to WAC 208-620-372 are liable for any  
17 violations of the Act and related rules by their MLOs.

18 **2.3 False Statements and Omissions of Material Facts.** Based on the Factual Allegations set forth in Section I  
19 above, Respondent CentralBanc and Respondent Reyes are in apparent violation of RCW 31.04.027(1), (2), (1),  
20 (8), and WAC 208-620-550(6) for negligently making any false statement, or knowingly and willfully making any  
21 omission of material fact, in connection with an examination conducted by the Department.

22 **2.4 Failure to Make Required Disclosures.** Based on the Factual Allegations set forth in Section I above,  
23 Respondent CentralBanc is in apparent violation of RCW 31.04.027(6), WAC 208-620-550(8), and WAC 208-  
24 620-550(16), for failing to make disclosures to borrowers as required by RCW 31.04.102 and any other applicable  
25 state or federal law.

1 **2.5 Failure to Preserve Records.** Based on the Factual Allegations set forth in Section I above, Respondent  
2 Delaney, Respondent CentralBanc, and Respondent Dolan are in apparent violation of RCW 31.04.155 and  
3 WAC 208-620-520(1), for failing to preserve all records, papers, documents, files, and other information relevant  
4 to loans required to be maintained under the Act.

5 **2.6 Unlicensed Location.** Based on the Factual Allegations set forth in Section I above, Respondent  
6 CentralBanc and Respondent Green are in apparent violation of RCW 31.04.027(14), RCW 31.04.035, and  
7 RCW 31.04.075 for originating and making residential mortgage loans from an unlicensed branch without first  
8 obtaining and maintaining the required branch license. Additionally, Respondent CentralBanc and Respondent  
9 Dolan are in apparent violation of RCW 31.04.175 for aiding and abetting Respondent Green's unlicensed activity.

10 **2.7 Failure to Properly Supervise.** Based on the Factual Allegations set forth in Section I above, Respondent  
11 Delany and/or Respondent Dolan are in apparent violation of RCW 31.04.027(2) for failing to properly supervise  
12 Respondent Green and Respondent Reyes.

### 13 III. AUTHORITY TO IMPOSE SANCTIONS

14 **3.1 Authority to Revoke Licenses.** Pursuant to RCW 31.04.093(3), the Director may revoke licenses issued  
15 under the Act for any knowing or negligent violation of any provision of the Act or the rules adopted thereunder.

16 **3.2 Authority to Prohibit from the Industry.** Pursuant to RCW 31.04.093(6), the Director may issue an order  
17 prohibiting from participation in the affairs of any licensee, any officer, principal, employee, or MLO of a licensee  
18 for a violation of RCW 31.04.027, RCW 31.04.102, or RCW 31.04.155.

19 **3.3 Authority to Impose Fines.** Pursuant to RCW 31.04.093(4), the Director may impose fines of up to one  
20 hundred dollars per day, per violation, upon licensees, employees, and MLOs for any violation of the Act.

21 **3.4 Authority to Charge and Collect Investigation Fees.** Pursuant to RCW 31.04.145(3) and WAC 208-620-  
22 590, every licensee investigated by the Director or the Director's designee shall pay for the cost of the  
23 investigation calculated at the rate of \$69.01 per staff hour devoted to the investigation.

24 **3.5 Authority to Recover Costs and Expenses.** Pursuant to RCW 31.04.205(2), the Director may recover the  
25 state's costs and expenses for prosecuting violations of the Act.

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

2 Respondents' violations of the provisions of chapter 31.04 RCW and chapter 208-620 WAC, as set forth in  
3 the above Factual Allegations, Grounds for Entry of Order, and Authority to Impose Sanctions, constitute a basis  
4 for the entry of an Order under RCW 31.04.093, RCW 31.04.165, and RCW 31.04.205. Therefore, it is the  
5 Director's intent to ORDER that:

- 6 **4.1** Respondent CentralBanc Mortgage Corporation's license to conduct the business of a  
7 consumer loan company under the Act be revoked.
- 8 **4.2** Respondent John C. Dolan's license to conduct the business of a mortgage loan originator  
9 under the Act be revoked.
- 10 **4.3** Respondent Karen A. Reyes' license to conduct the business of a mortgage loan originator  
11 under the Act be revoked.
- 12 **4.4** Respondent Brett T. Green's license to conduct the business of a mortgage loan originator  
13 under the Act be revoked.
- 14 **4.5** Respondent John W. Delaney be prohibited from participation in the conduct of the affairs  
15 of any consumer loan company licensed by, or subject to licensure by, the Director, in any  
16 manner, for a period of five (5) years.
- 17 **4.6** Respondent John C. Dolan be prohibited from participation in the conduct of the affairs of  
18 any consumer loan company licensed by, or subject to licensure by, the Director, in any  
19 manner, for a period of five (5) years.
- 20 **4.7** Respondent Karen A. Reyes be prohibited from participation in the conduct of the affairs of  
21 any consumer loan company licensed by, or subject to licensure by, the Director, in any  
22 manner, for a period of ten (10) years.
- 23 **4.8** Respondent Brett T. Green be prohibited from participation in the conduct of the affairs of  
24 any consumer loan company licensed by, or subject to licensure by, the Director, in any  
25 manner, for a period of five (5) years.
- 4.9** Respondent John W. Delaney, Respondent CentralBanc Mortgage Corporation, and  
Respondent John C. Dolan jointly and severally pay a fine. As of the date of this Statement  
of Charges the fine totals \$350,000.
- 4.10** Respondent Karen A. Reyes pay a fine of \$50,000.
- 4.11** Respondent Brett T. Green pay a fine of \$30,000.
- 4.12** Respondent John W. Delaney, Respondent CentralBanc Mortgage Corporation, and  
Respondent John C. Dolan jointly and severally pay an investigation fee. As of the date of  
this Statement of Charges the investigation fee totals \$4,600.

