

ORDER SUMMARY
Consumer Services Division Case Number C-23-3502-24-FO01

Final Orders resolve investigations where companies or individuals have been charged and then the Department has imposed sanctions.

Once DFI serves the Final Order on the individual or company, the company or individual has 10 days to petition (formally ask) the Director of DFI to reconsider. The company or individual can appeal in superior court.

Name	Kevin Michael Killeen, NMLS # 1736051
Order Number	C-23-3502-24-FO01
Date issued	9/13/24

What does this Final Order require?

- Respondent must pay a fine of \$388,900.00
- Respondent must pay an investigation fee of \$28,370.01. (Investigation fees cover the cost of DFI staff time working on the investigation.)
- Respondent must pay the Department’s costs and expenses for prosecuting violation of the Consumer Loan Act of Washington of \$66,470.17.
- Respondent is permanently prohibited from participation in the affairs of any consumer loan company in Washington.
- Respondent must cease and desist from engaging in any residential mortgage loan activity subject to licensure by the Department.

Need more information?

You can contact the Consumer Services Division, Enforcement unit at (360) 902-8703 or cseforcecomplaints@dfi.wa.gov. Please remember that we cannot provide financial or legal advice to members of the public. We also cannot release confidential information.

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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
Consumer Loan Act of Washington by:

No.: C-23-3502-24-FO01

KEVIN MICHAEL KILLEEN,
NMLS #1736051,

FINAL ORDER

Respondent.

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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 Ali Higgs (Director's designee), pursuant to RCW 34.05.440(1). On December 20, 2023, the Director, through the Director's designee, issued a Statement of Charges and Notice of Intention to Enter an Order to Cease and Desist, Prohibit from Industry, Impose Fine, Collect Investigation Fee, and Recover Costs and Expenses (Statement of Charges) against Kevin Michael Killeen (Respondent). 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 December 21, 2023, a Notice of Opportunity to Defend and Opportunity for Hearing, and a blank Application for Adjudicative Hearing for Respondent (collectively, accompanying documents).

On December 21, 2023, the Department served Respondent with the Statement of Charges and accompanying documents by First-Class mail and Federal Express overnight delivery. On December 26, 2023, the documents sent by Federal Express overnight delivery were delivered. The documents sent by First-Class mail were not returned to the Department by the United States Postal Service.

1 On January 10, 2024, the Department received an Application for Adjudicative Hearing from
2 the Respondent. On January 12, 2024, the Department made a request to the Office of
3 Administrative Hearings (OAH) to assign an Administrative Law Judge (ALJ) to schedule and
4 conduct a hearing on the Statement of Charges and issue an Initial Decision. On January 24, 2024,
5 OAH issued a Notice of Prehearing Conference, setting a prehearing conference on February 5, 2024,
6 at 1:00 p.m. with ALJ Travis Dupree (ALJ Dupree). On February 5, 2024, all parties attended a
7 telephonic prehearing conference. On February 9, 2024, ALJ Dupree issued an Order Granting
8 Continuance and Notice of Prehearing Conference and moved the prehearing conference to March 6,
9 2024, at 2:00 p.m.

10 On March 6, 2024, all parties attended a telephonic prehearing conference. On March 11,
11 2024, ALJ Dupree issued a Prehearing Conference Order and Notice of Hearing (Notice of Hearing)
12 scheduling a motion hearing on August 7, 2024, at 9:00 a.m.

13 On July 8, 2024, a representative for the Department filed a Motion for Summary Judgment.
14 The motion hearing and oral arguments on the Department's Motion for Summary Judgment were
15 held on August 7, 2024, at 9:00 a.m. Respondent did not appear at the motion hearing and did not
16 respond to the Motion for Summary Judgment. On August 8, 2024, ALJ Dupree issued an Order
17 Dismissing Appeal and mailed it to Respondent. The Department did not receive a Petition to
18 Reinstate within seven days of service of the Order Dismissing Appeal.

19 Pursuant to RCW 34.05.464 and WAC 10-08-211, Respondent had twenty days from the date
20 of service of the Order Dismissing Appeal to file a Petition for Review. Respondent did not file a
21 Petition for Review during the statutory period.

22 B. Record Presented. The record presented to the Director's designee for her review and
23 for entry of a final decision included the following:

- 1 1. Statement of Charges, cover letter dated December 21, 2023, Notice of
2 Opportunity to Defend and Opportunity for Hearing, and blank Application for
3 Adjudicative Hearing for Respondent, with documentation for service.
- 4 2. Application for Adjudicative Hearing for Kevin Michael Killeen.
- 5 3. Request to OAH for Assignment of Administrative Law Judge.
- 6 4. Notice of Prehearing Conference dated January 24, 2024, with documentation of
7 service.
- 8 5. Order Granting Continuance and Notice of Prehearing Conference dated February
9 9, 2024, with documentation of service.
- 10 6. Prehearing Conference Order, Notice of Motion Hearing, and Notice of Hearing
11 dated March 11, 2024, with documentation of service.
- 12 7. Department's Motion for Summary Judgment dated July 8, 2024, with
13 declarations, exhibits, and documentation of service.
- 14 8. Order Dismissing Appeal dated August 8, 2024, with documentation of service.

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

17 II. FINAL ORDER

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

20 A. IT IS HEREBY ORDERED, That:

- 21 1. Respondent Kevin Michael Killeen cease and desist from engaging in any activity,
22 directly or indirectly, involving residential mortgage loans subject to licensure by
23 the Department.
- 24 2. Respondent Kevin Michael Killeen be permanently prohibited from participation
in the conduct of the affairs of any consumer loan company subject to licensure by
the Director, in any manner.
3. Respondent Kevin Michael Killeen pay a fine of \$388,900.00.
4. Respondent Kevin Michael Killeen pay an investigation fee of \$28,370.01.

1 5. Respondent Kevin Michael Killeen pay the Department's costs and expenses for
2 prosecuting violations of the act of \$66,470.17.

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

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

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

16 D. Judicial Review. Respondent Kevin Michael Killeen has the right to petition the
17 superior court for judicial review of this agency action under the provisions of chapter 34.05 RCW.
18 For the requirements for filing a Petition for Judicial Review, see RCW 34.05.510 and sections
19 following.

20 E. Non-compliance with Order. If you do not comply with the terms of this order,
21 including payment of any amounts owed within thirty days of receipt of this order, the Department
22 may seek its enforcement by the Office of the Attorney General to include the collection of the fines,
23 investigation fees, and prosecution costs imposed herein. The Department also may assign the
24 amounts owed to a 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.

4 DATED this 13th day of September, 2024.



5 STATE OF WASHINGTON
6 DEPARTMENT OF FINANCIAL INSTITUTIONS

7 [REDACTED]
8 _____
9 ALI HIGGS, Director
10 Division of Consumer Services

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

IN THE MATTER OF DETERMINING
Whether there has been a violation of the
Consumer Loan Act of Washington by:

KEVIN MICHAEL KILLEEN,
NMLS #1736051,

Respondent.

No. C-23-3502-23-SC01

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

INTRODUCTION

Pursuant to RCW 31.04.093 and RCW 31.04.165, the Director of the Department of Financial Institutions of the State of Washington (Director) is responsible for the administration of chapter 31.04 RCW, the Consumer Loan Act (Act). After having conducted an investigation pursuant to RCW 31.04.145, and based upon the facts available as of the date of this Statement of Charges, the Director, through his designee, Division of Consumer Services Acting Director Ali Higgs, institutes this proceeding and finds as follows:

I. FACTUAL ALLEGATIONS

1.1 Respondent. Respondent Kevin Michael Killeen, NMLS #1736051 (Respondent Killeen), is not licensed by the Department to conduct business as a mortgage loan originator.

A. Sun West Mortgage Company, Inc. Respondent Killeen was employed with a title of Recruiter for Sun West Mortgage Company, Inc., NMLS #3277 (Sun West), a licensed consumer loan company, from on or about May 19, 2019, to November 2, 2020.

B. Amerifirst Financial, Inc. Respondent Killeen was employed with a title of Divisional Recruiter for Amerifirst Financial, Inc., NMLS #145368 (Amerifirst), a

1 licensed consumer loan company, from on or about April 5, 2021, to December 23,
2 2021.

3 **C. Amerisave Mortgage Corporation.** Respondent Killeen was employed with a title of
4 Retail Business Development Manager for Amerisave Mortgage Corporation, NMLS
5 #1168 (Amerisave), a licensed consumer loan company, from on or about December
6 27, 2021, to June 28, 2022.

7 **D. Amerifirst.** Respondent Killeen was employed as an independent contractor for
8 Amerifirst, a licensed consumer loan company, from on or about July 1, 2022, to
9 December 31, 2022.

10 **E. Summit Funding, Inc.** Respondent Killeen was employed with a title of Area
11 Manager for Summit Funding, Inc., NMLS #3199 (Summit) a licensed consumer loan
12 company, from on or about December 27, 2022, to January 19, 2023.

13 **1.2 Prior Regulatory Actions.**

14 **A. Final Order.** On or about July 21, 2014, the Department filed Statement of Charges
15 and Notice of Intention to Enter an Order to Prohibit from Industry No. C-14-1532-14-
16 SC01 (2014 Statement of Charges). The 2014 Statement of Charges alleged that on or
17 about September 28, 1990, Respondent Killeen plead guilty to two felony counts
18 involving [REDACTED]. On or about July 14, 2015, the
19 Department entered Final Decision & Order Denying Petition for Review and
20 Affirming Initial Order Granting Summary Judgment No. C-14-1532-15-FO01 (Final
21 Decision & Order). The Final Decision & Order affirmed the Initial Order Granting
22 Summary Judgment and denied Respondent Killeen's Petition for Review. The Final
23 Decision & Order also prohibited Respondent Killeen from participation in the
24

1 conduct of the affairs of any consumer loan company subject to licensure by the
2 Director.

3 **B. Consent Order.** On or about January 13, 2020, the Department filed a Statement of
4 Charges and Notice of Intent to Enter an Order to Cease and Desist, Revoke License,
5 Prohibit from Industry, Impose Fines, Collect Investigation Fees, and Recover Costs
6 and Expenses No. C-19-2686-20-SC01 (2020 Statement of Charges) against
7 Respondent Killeen and Cardinal Financial Company, Limited Partnership, NMLS
8 #66247 (Cardinal). The 2020 Statement of Charges alleged Respondent Killeen
9 violated the Final Decision & Order by participating in the conduct of the affairs of a
10 consumer loan company and engaging in unlicensed mortgage loan origination
11 activity. On or about March 9, 2020, Respondent Killeen entered into a Consent
12 Order as to Kevin Michael Killeen No. C-19-2686-20-CO01 (Consent Order) with the
13 Department. The Consent Order included an agreement that Respondent Killeen
14 would cease and desist from engaging in activity in a manner that was injurious to the
15 public or that violated the Consumer Loan Act, including unlicensed loan origination
16 and all activity in violation of any order issued by the Department. The Consent Order
17 also included an agreement that Respondent Killeen was prohibited and would refrain
18 from participating, in any capacity, in the conduct of the affairs of any consumer loan
19 company by the Department or subject to licensure or regulation by the Department.

20 **1.3 Altered Document.**

21 **A. Sun West.** On or about August 26, 2020, Respondent Killeen submitted to a Sun
22 West investigator an altered email chain that took place between Respondent Killeen
23 and the Department. The email chain submitted to the Sun West investigator
24 contained missing statements, including a discussion related to whether Respondent

1 Killeen would violate the Consent Order if he obtained a position recruiting mortgage
2 loan originators and branches. A discussion related to an investigation and issuance of
3 the 2020 Statement of Charges against Cardinal and Respondent Killeen was also
4 among the omissions.

5 **B. Amerifirst.** On or about May 6, 2022, Respondent Killeen submitted to Amerifirst an
6 altered email chain that took place between Respondent Killeen and the Department.
7 The email chain submitted to Amerifirst contained missing statements, including a
8 discussion related to whether Respondent Killeen would violate the Consent Order if
9 he obtained a position recruiting mortgage loan originators and branches. A
10 discussion related to an investigation and issuance of the 2020 Statement of Charges
11 against Cardinal and Respondent Killeen was also among the omissions.

12 **C. Summit.** On or about January 17, 2023, Respondent Killeen submitted to Summit an
13 altered email chain that took place between Respondent Killeen and the Department.
14 The email chain submitted to Summit contained missing statements, including a
15 discussion related to whether Respondent Killeen would violate the Consent Order if
16 he obtained a position recruiting mortgage loan originators and branches. A
17 discussion related to an investigation and issuance of the 2020 Statement of Charges
18 against Cardinal and Respondent Killeen was also among the omissions.

19 **1.4 Unauthorized Access to Mortgage Loan Origination Software.** Between on or about
20 January 3, 2023, and January 12, 2023, Respondent Killeen accessed Summit's Mortgage Loan
21 Origination Software, Encompass Banker, using the login information for at least two Washington
22 licensed mortgage loan originators. Respondent Killeen did not have authorization from Summit to
23 access the Washington licensed mortgage loan originators' accounts in any manner.

1 **1.5 Violation of Prior Orders.**

2 **A. Participation at Sun West.** Between at least May 19, 2019, to November 2, 2020,
3 Respondent Killeen participated in the conduct of the affairs of Sun West, a consumer
4 loan company subject to licensure by the Director under the Act, in violation of the
5 Consent Order identified in paragraph 1.2.B.

6 **B. Failed to Cease and Desist at Sun West.** Between at least May 19, 2019, to
7 November 2, 2020, Respondent Killeen failed to cease and desist from engaging in
8 activity in a manner that was injurious to the public or that violated the Consumer
9 Loan Act, including all activity in violation of any order issued by the Department, in
10 violation of the Consent Order identified in paragraph 1.2.B.

11 **C. Participation at Amerifirst.** Between at least April 5, 2021, to December 23, 2021,
12 Respondent Killeen participated in the conduct of the affairs of Amerifirst, a consumer
13 loan company subject to licensure by the Director under the Act, in violation of the
14 Consent Order identified in paragraph 1.2.B.

15 **D. Failed to Cease and Desist at Amerifirst.** Between at least April 5, 2021, to
16 December 23, 2021, Respondent Killeen failed to cease and desist from engaging in
17 activity in a manner that was injurious to the public or that violated the Consumer
18 Loan Act, including all activity in violation of any order issued by the Department, in
19 violation of the Consent Order identified in paragraph 1.2.B.

20 **E. Participation at Amerisave.** Between at least December 27, 2021, to June 28, 2022,
21 Respondent Killeen participated in the conduct of the affairs of Amerisave, a
22 consumer loan company subject to licensure by the Director under the Act, in
23 violation of the Consent Order identified in paragraph 1.2.B. It appears that the
24 participation in the conduct of the affairs of Amerisave included unlicensed activity.

1 **F. Failed to Cease and Desist at Amerisave.** Between at least December 27, 2021, to
2 June 28, 2022, Respondent Killeen failed to cease and desist from engaging in activity
3 in a manner that was injurious to the public or that violated the Consumer Loan Act,
4 including all activity in violation of any order issued by the Department, in violation
5 of the Consent Order identified in paragraph 1.2.B.

6 **G. Participation at Amerifirst.** Between at least July 1, 2022, to December 31, 2022,
7 Respondent Killeen participated in the conduct of the affairs of Amerifirst, a consumer
8 loan company subject to licensure by the Director under the Act, in violation of the
9 Consent Order identified in paragraph 1.2.B.

10 **H. Failed to Cease and Desist at Amerifirst.** Between at least July 1, 2022, to
11 December 31, 2022, Respondent Killeen failed to cease and desist from engaging in
12 activity in a manner that was injurious to the public or that violated the Consumer
13 Loan Act, including all activity in violation of any order issued by the Department, in
14 violation of the Consent Order identified in paragraph 1.2.B.

15 **I. Participation at Summit.** Between at least December 27, 2022, to January 19, 2023,
16 Respondent Killeen participated in the conduct of the affairs of Summit, a consumer
17 loan company subject to licensure by the Director under the Act, in violation of the
18 Consent Order identified in paragraph 1.2.B. It appears that the participation in the
19 conduct of the affairs of Summit included unlicensed activity.

20 **J. Failed to Cease and Desist at Summit.** Between at least December 27, 2022, to
21 January 19, 2023, Respondent Killeen failed to cease and desist from engaging in
22 activity in a manner that was injurious to the public or that violated the Consumer
23 Loan Act, including all activity in violation of any order issued by the Department, in
24 violation of the Consent Order identified in paragraph 1.2.B.

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

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

4 **2.1 Definition of Residential Mortgage Loan.** Pursuant to RCW 31.04.015(24) “residential
5 mortgage loan” means any loan primarily for personal, family, or household use that is secured by a
6 mortgage, deed of trust, or other consensual security interest on a dwelling, as defined in the truth in
7 lending act, or residential real estate upon which is constructed or intended to be constructed a
8 dwelling.

9 **2.2 Definition of Mortgage Loan Originator.** Pursuant to RCW 31.04.015(17)(a), "Mortgage
10 loan originator" means an individual who for compensation or gain (i) takes a residential mortgage
11 loan application, or (ii) offers or negotiates terms of a residential mortgage loan. Pursuant to RCW
12 31.04.015(18)(b) “Mortgage loan originator" includes an individual who for direct or indirect
13 compensation or gain performs residential mortgage loan modification services or holds himself or
14 herself out as being able to perform residential mortgage loan modification services.

15 **2.3 Definition of Borrower.** Pursuant to RCW 31.04.015(4), "Borrower" means any person who
16 consults with or retains a licensee or person subject to this chapter in an effort to obtain or seek
17 information about obtaining a loan, regardless of whether that person actually obtains such a loan.
18 "Borrower" includes a person who consults with or retains a licensee or person subject to this chapter
19 in an effort to obtain, or who seeks information about obtaining a residential mortgage loan
20 modification, regardless of whether that person actually obtains a residential mortgage loan
21 modification.

22 **2.4 Employing Scheme, Device, or Artifice to Defraud or Mislead.** Based on the Factual
23 Allegations set forth in Section I above, Respondent Killeen is in apparent violation of RCW
24

1 31.04.027(1)(a) by directly or indirectly employ any scheme, device, or artifice to defraud or mislead
2 any borrower, to defraud or mislead any lender, or to defraud or mislead any person.

3 **2.5 Unfair or Deceptive Practice.** Based on the Factual Allegations set forth in Section I above,
4 Respondent Killeen is in apparent violation of RCW 31.04.027(1)(b) for directly or indirectly
5 engaging in any unfair or deceptive practice toward any person.

6 **2.6 Obtaining Property by Fraud or Misrepresentation.** Based on the Factual Allegations set
7 forth in Section I above, Respondent Killeen is in apparent violation of RCW 31.04.027(1)(c) for
8 directly or indirectly obtaining property by fraud or misrepresentation.

9 **2.7 Violation of Prior Orders.** Based on the Factual Allegations set forth in Section I above,
10 Respondent Killeen is in apparent violation of WAC 208-620-550(14) for failing to comply with
11 orders issued by the Department.

12 III. AUTHORITY TO IMPOSE SANCTIONS

13 **3.1 Authority to Issue an Order to Cease and Desist.** Pursuant to RCW 31.04.093(5)(a), the
14 Director may issue orders directing a licensee, its employee, loan originator, or other person subject
15 to the Act to cease and desist from conducting business in a manner that is injurious to the public or
16 violates any provision of the Act.

17 **3.2 Authority to Prohibit from the Industry.** Pursuant to RCW 31.04.093(6), the Director may
18 issue an order prohibiting from participation in the affairs of any licensee, any officer, principal,
19 employee, mortgage loan originator, or any other person subject to the Act for (d) failure to comply
20 with any order or subpoena issued under the Act; (e) A violation of RCW 31.04.027.

21 **3.3 Authority to Impose Fine.** Pursuant to RCW 31.04.093(4)(a) and (b), the Director may
22 impose fines of up to one hundred dollars per day, per violation, upon the licensee, its employee or
23 loan originator, or any other person subject to the Act for any violation of the Act; or failure to
24 comply with any order or subpoena issued by the Director under the Act.

1 **3.4 Authority to Charge Investigation Fee.** Pursuant to RCW 31.04.145(3) and WAC 208-620-
2 590, WAC 208-620-610(7), every licensee examined or investigated by the Director or the Director's
3 designee must pay for the cost of the investigation, calculated at the rate of \$69.01 per staff hour
4 devoted to the investigation.

5 **3.5 Authority to Recover Costs and Expenses.** Pursuant to RCW 31.04.205(2), the Director
6 may recover the state's costs and expenses for prosecuting violations of the Act.

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

8 Respondent Killeen's violations of the provisions of chapter 31.04 RCW and chapter 208-620
9 WAC, as set forth in the above Factual Allegations, Grounds for Entry of Order, and Authority to
10 Impose Sanctions, constitute a basis for the entry of an Order under RCW 31.04.093, RCW
11 31.04.165, RCW 31.04.202, and RCW 31.04.205. Therefore, it is the Director's intent to ORDER
12 that:

- 13 **4.1** Respondent Kevin Michael Killeen cease and desist from engaging in any activity,
14 directly or indirectly, involving residential mortgage loans subject to licensure by the
15 Department.
- 16 **4.2** Respondent Kevin Michael Killeen be permanently prohibited from participation in
17 the conduct of the affairs of any consumer loan company subject to licensure by the
18 Director, in any manner.
- 19 **4.3** Respondent Kevin Michael Killeen, pay a fine which as of the date this Statement of
20 Charges totals \$388,900.00.
- 21 **4.4** Respondent Kevin Michael Killeen pay an investigation fee, which as of the date of
22 this Statement of Charges totals \$28,370.01.
- 23 **4.5** Respondent Kevin Michael Killeen pay the Department's costs and expenses
24 for prosecuting violations of the Act in an amount to be determined at hearing or by
declaration with supporting documentation in event of default by Respondent Kevin
Michael Killeen.

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1 **V. AUTHORITY AND PROCEDURE**

2 This Statement of Charges and Notice of Intent to Enter an Order to Cease and Desist,
3 Prohibit from Industry, Impose Fine, Collect Investigation Fee, and Recover Costs and Expenses
4 (Statement of Charges) is entered pursuant to the provisions of RCW 31.04.093, RCW 31.04.165,
5 RCW 31.04.202, and RCW 31.04.205, and is subject to the provisions of chapter 34.05 RCW (The
6 Administrative Procedure Act). Respondent Killeen may make a written request for a hearing as set
7 forth in the NOTICE OF OPPORTUNITY TO DEFEND AND OPPORTUNITY FOR HEARING
8 accompanying this Statement of Charges.

9
10 Dated this 20th day of December, 2023.



11 [Redacted Signature]
12 _____
13 ALI HIGGS, Acting Director
14 Division of Consumer Services
15 Department of Financial Institutions

16 Presented by:

17 [Redacted Signature]
18 _____
19 RACHELLE VILLALOBOS
20 Financial Legal Examiner

21 [Redacted Signature]
22 _____
23 MEGAN GUTHRIE
24 Financial Legal Examiner

Approved by:

25 [Redacted Signature]
26 _____
27 JAMES R. BRUSSELBACK
28 Acting Enforcement Chief