

ORDER SUMMARY – Case Number: C-16-1935

Name(s): Nationwide Audit Service, LLC; 4Venture, LLC; Nuevo Casa Sol LLC; Pablo Alberto Vega Velazco

Order Number: C-16-1935-22-FO01

Effective Date: 4/29/2022

NMLS Identifier:

License Effect: N/A

Not Apply Until: Permanent prohibition from mortgage broker industry in Washington

Not Eligible Until: Permanent prohibition from mortgage broker industry in Washington

Prohibition/Ban Until: Permanent prohibition from mortgage broker industry in Washington

Investigation Costs	\$ 19,627.20	Due 6/1/2022	Paid <input type="checkbox"/> Y <input checked="" type="checkbox"/> N	Date
Fine	\$18,000	Due 6/1/2022	Paid <input type="checkbox"/> Y <input checked="" type="checkbox"/> N	Date
Assessment(s)	\$		Paid <input type="checkbox"/> Y <input type="checkbox"/> N	Date
Restitution	\$149,639.02	Due 6/1/2022	Paid <input type="checkbox"/> Y <input checked="" type="checkbox"/> N	Date
Financial Literacy and Education	\$		Paid <input type="checkbox"/> Y <input type="checkbox"/> N	Date
Cost of Prosecution	\$		Paid <input type="checkbox"/> Y <input type="checkbox"/> N	Date
	No. of Victims:	6		

Comments:

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**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-16-1935-22-FO01

FINAL ORDER

NATIONWIDE AUDIT SERVICE, LLC a/k/a
N.A.S.,

NUEVO CASA SOL, LLC,

4VENTURE, LLC,

and

PABLO ALBERTO VEGA VELAZCO a/k/a
ALBERTO VEGA a/k/a PABLO VEGA a/k/a
PABLO VELAZCO,
Owner/Member,

Respondents.

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 Lucinda Fazio (Director's designee), pursuant to RCW 34.05.440(1). On March 16, 2022, 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, Order Restitution, Impose Fine, Collect Investigation Fee, and Recover Costs and Expenses (Statement of Charges) against Nationwide Audit Service, LLC a/k/a N.A.S.; Nuevo Casa Sol, LLC; 4Venture, LLC; and Pablo Alberto Vega Velazco a/k/a Alberto Vega a/k/a Pablo Vega a/k/a Pablo Velazco (Respondents). A copy of the Statement of Charges is attached and incorporated into this order by this reference. Each

1 copy of the Statement of Charges was accompanied by a cover letter dated March 22, 2022, a Notice
2 of Opportunity to Defend and Opportunity for Hearing, and a blank Application for Adjudicative
3 Hearing for each of the Respondents (collectively, accompanying documents).

4 On March 22, 2022, the Department served Respondents with the Statement of Charges and
5 accompanying documents by First-Class mail and Federal Express overnight delivery at an address in
6 Kirkland, Washington. On March 24, 2022, the documents sent by Federal Express overnight
7 delivery were delivered. The documents sent by First-Class mail were not returned to the
8 Department by the United States Postal Service.

9 Respondents did not request an adjudicative hearing within twenty calendar days after the
10 Department served the Notice of Opportunity to Defend and Opportunity for Hearing, as provided for
11 in WAC 208-08-050(2).

12 B. Record Presented. The record presented to the Director's designee for his review and
13 for entry of a final decision included the following: Statement of Charges, cover letters dated March
14 22, 2022, a Notice of Opportunity to Defend and Opportunity for Hearing for each Respondent, and a
15 blank Application for Adjudicative Hearing for each Respondent, with documentation for service.

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

18 II. FINAL ORDER

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

21 A. IT IS HEREBY ORDERED, That:

- 22 1. Respondents Nationwide Audit Service, LLC a/k/a N.A.S., Nuevo Casa Sol, LLC,
23 4Venture, LLC, and Pablo Alberto Vega Velazco a/k/a Alberto Vega a/k/a Pablo
24 Vega a/k/a Pablo Velazco cease and desist from engaging in the business of a
mortgage broker and/or loan originator.

2. Respondents Nationwide Audit Service, LLC a/k/a N.A.S., Nuevo Casa Sol, LLC, 4Venture, LLC, and Pablo Alberto Vega Velazco a/k/a Alberto Vega a/k/a Pablo Vega a/k/a Pablo Velazco are prohibited from participation in the conduct of the affairs of any mortgage broker and/or loan originator.
3. Respondents Nationwide Audit Service, LLC a/k/a N.A.S., Nuevo Casa Sol, LLC, 4Venture, LLC, and Pablo Alberto Vega Velazco a/k/a Alberto Vega a/k/a Pablo Vega a/k/a Pablo Velazco jointly and severally pay a fine of \$18,000.
4. Respondents Nationwide Audit Service, LLC a/k/a N.A.S., Nuevo Casa Sol, LLC, 4Venture, LLC, and Pablo Alberto Vega Velazco a/k/a Alberto Vega a/k/a Pablo Vega a/k/a Pablo Velazco jointly and severally pay restitution to the consumers identified in Appendices A and B to the attached Statement of Charges in the amounts set forth therein and jointly and severally pay restitution to each Washington consumer with whom they entered into a contract for residential mortgage loan modification services related to real property or consumers located in the state of Washington equal to the amount collected from that Washington consumers for those services.
5. Respondents Nationwide Audit Service, LLC a/k/a N.A.S., Nuevo Casa Sol, LLC, 4Venture, LLC, and Pablo Alberto Vega Velazco a/k/a Alberto Vega a/k/a Pablo Vega a/k/a Pablo Velazco jointly and severally pay an investigation fee of \$19,627.20.
6. Respondents Nationwide Audit Service, LLC a/k/a N.A.S., Nuevo Casa Sol, LLC, 4Venture, LLC, and Pablo Alberto Vega Velazco a/k/a Alberto Vega a/k/a Pablo Vega a/k/a Pablo Velazco, their officers, employees, and agents maintain records in compliance with chapter 19.146 RCW, the Mortgage Broker Practices Act (Act) and provide the Director with the location of the books, records and other information relating to their business, and the name, address and telephone number of the individual responsible for maintenance of such records in compliance with the Act.

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

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

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

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

10 E. Non-compliance with Order. If Respondents do not comply with the terms of this
11 order, **including payment of any amounts owed within 30 days of receipt of this order**, the
12 Department may seek its enforcement by the Office of the Attorney General to include the collection
13 of the fines and fees imposed herein. The Department also may assign the amounts owed to a
14 collection agency for collection.

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

18 DATED this 29th day of April, 2022.



19
20 STATE OF WASHINGTON
DEPARTMENT OF FINANCIAL INSTITUTIONS

21 /s/

22 _____
LUCINDA FAZIO, Director
23 Division of Consumer Services

1 **STATE OF WASHINGTON**
2 **DEPARTMENT OF FINANCIAL INSTITUTIONS**
3 **DIVISION OF CONSUMER SERVICES**

4 IN THE MATTER OF DETERMINING
5 WHETHER THERE HAS BEEN A VIOLATION
6 OF THE MORTGAGE BROKER PRACTICES
7 ACT OF WASHINGTON BY:

8 NATIONWIDE AUDIT SERVICE, LLC a/k/a
9 N.A.S.,

10 NUEVO CASA SOL, LLC,

11 4VENTURE, LLC,

12 and

13 PABLO ALBERTO VEGA VELAZCO a/k/a
14 ALBERTO VEGA a/k/a PABLO VEGA a/k/a
15 PABLO VELAZCO,
16 Owner/Member,

17 Respondents.

No. C-16-1935-22-SC01

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

18 **INTRODUCTION**

19 Pursuant to RCW 19.146.220 and RCW 19.146.223, the Director of the Department of
20 Financial Institutions of the State of Washington (Director) is responsible for the administration of
21 chapter 19.146 RCW, the Mortgage Broker Practices Act (Act). After having conducted an
22 investigation pursuant to RCW 19.146.235, and based on the facts available as of the date of this
23 Statement of Charges, the Director, through his designee, Division of Consumer Services Director
24 Lucinda Fazio, institutes this proceeding and finds as follows:

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1 **I. FACTUAL ALLEGATIONS**

2 **1.1 Respondents.**

3 a. **Respondent Nationwide Audit Service, LLC a/k/a N.A.S. (Respondent NAS)** has
4 never been licensed by the Department of Financial Institutions of the State of Washington
5 (Department) to conduct business as a mortgage broker.

6 b. **Respondent Nuevo Casa Sol, LLC (Respondent Nuevo Casa)** has never been
7 licensed by the Department to conduct business as a mortgage broker.

8 c. **Respondent 4Venture, LLC (Respondent 4Venture)** has never been licensed by the
9 Department to conduct business as a mortgage broker.

10 d. **Respondent Pablo Alberto Vega Velazco (Respondent Velazco)** was a principal of
11 Respondents NAS, Nuevo Casa, and 4Venture. Respondent Velazco has never been licensed by the
12 Department to conduct business as a mortgage broker or loan originator.

13 **1.2 Unlicensed Activity by Respondents NAS and Velazco.** Between at least November 2013
14 and September 2014, Respondents NAS and Velazco held themselves out as able to provide residential
15 mortgage loan modifications services. During that period, Respondents NAS and Velazco told at least
16 two Washington consumers that Respondents NAS and Velazco would help the consumers modify
17 their residential mortgage loans. At least two consumers paid Respondents NAS and Velazco for
18 those services. Whether Respondents NAS and Velazco actually performed any services to help the
19 consumers modify their residential mortgage loans is unknown. At least one consumer did not receive
20 a loan modification as a result of any services provided by Respondents NAS and Velazco. A list of
21 Washington consumers with whom Respondents NAS and Velazco did business as a mortgage broker
22 or loan originator, and the amount paid by each consumer, is attached hereto as Appendix A and
23 incorporated by reference.

1 **1.3 Unlicensed Activity by Respondents Nuevo Casa, 4Venture, and Velazco.** In 2019,
2 Respondents Nuevo Casa, 4Venture, and Velazco held themselves out as able to provide residential
3 mortgage loan modifications services. During that period, Respondents Nuevo Casa, 4Venture, and
4 Velazco told at least two Washington consumers that Respondents Nuevo Casa, 4Venture, and
5 Velazco would help the consumers modify their residential mortgage loans. At least two consumers
6 paid Respondents Nuevo Casa, 4Venture, and Velazco for those services. Whether Respondents
7 Nuevo Casa, 4Venture, and Velazco actually performed any services to help the consumers modify
8 their residential mortgage loans is unknown. A list of Washington consumers with whom
9 Respondents Nuevo Casa, 4Venture, and Velazco did business as a mortgage broker or loan originator,
10 and the amount paid by each consumer, is attached hereto as Appendix B and incorporated by
11 reference.

12 **1.4 Misrepresentations Regarding Mortgage Payments.** Respondents NAS and Velazco told
13 least one consumer that they would make mortgage payments on the consumer's behalf. Respondents
14 NAS and Velazco did not make any mortgage payments on the consumer's behalf.

15 **1.5 Impermissible Fees.** In each transaction referenced in paragraphs 1.2 through 1.4 above,
16 Respondents collected fees from the consumers even though Respondents had not obtained residential
17 mortgage loan modifications for the consumers. In addition, in all but one of the transactions
18 referenced in paragraphs 1.2 through 1.4 above, Respondents collected fees that were higher than
19 \$750, unreasonable in light of the service provided (if any), or both.

20 **1.6 On-Going Investigation.** The Department's investigation into the alleged violations of the
21 Act by Respondents continues to date.

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

2 **2.1 Mortgage Broker Defined.** Pursuant to RCW 19.146.010(14), "Mortgage broker" means any
3 person who for direct or indirect compensation or gain, or in the expectation of direct or indirect
4 compensation or gain (a) assists a person in obtaining or applying to obtain a residential mortgage loan
5 or performs residential mortgage loan modification services, or (b) holds himself or herself out as
6 being able to assist a person in obtaining or applying to obtain a residential mortgage loan or provide
7 residential mortgage loan modification services.

8 **2.2 Loan Originator Defined.** Pursuant to RCW 19.146.010(11)(b), "Loan originator" means a
9 natural person who for direct or indirect compensation or gain or in the expectation of direct or
10 indirect compensation or gain performs residential mortgage loan modification services or holds
11 himself or herself out as being able to perform residential mortgage loan modification services.

12 **2.3 Requirement to Obtain and Maintain Mortgage Broker License.** Based on the Factual
13 Allegations set forth in Section I, Respondents are in apparent violation of RCW 19.146.200(1) for
14 engaging in the business of a mortgage broker for Washington residents or property without first
15 obtaining a license to do so.

16 **2.4 Requirement to Obtain and Maintain Loan Originator License.** Based on the Factual
17 Allegations set forth in Section I, Respondents are in apparent violation of RCW 19.146.200(1) for
18 engaging in the business of a loan originator without first obtaining and maintaining a license.

19 **2.5 Prohibited Acts.** Based on the Factual Allegations set forth in Section I, Respondents are in
20 apparent violation of RCW 19.146.0201(2), and (3) for engaging in an unfair or deceptive practice
21 toward any person and obtaining property by fraud or misrepresentation.

22 **2.6 Prohibition Against Taking Advance Fees.** Based on the Factual Allegations set forth in
23 Section I, Respondents are in apparent violation of RCW 19.146.0201(11) and 12 CFR Section 1015.5

1 for receiving payment of any fee or other consideration without the consumer first executing a written
2 agreement with the consumer's loan holder or servicer incorporating an offer of mortgage assistance
3 relief obtained by Respondents.

4 **2.7 Prohibition Against Unreasonable Fees.** Based on the Factual Allegations set forth in
5 Section I, Respondents are in apparent violation of RCW 19.146.355(1) for receiving an advance fee
6 greater than \$750 or charging total fees that are not reasonable in light of the service provided.

7 **III. AUTHORITY TO IMPOSE SANCTIONS**

8 **3.1 Authority to Issue an Order to Cease and Desist.** Pursuant to RCW 19.146.220(3), the
9 Director may issue orders directing any person subject to the Act to cease and desist from conducting
10 business.

11 **3.2 Authority to Prohibit from Industry.** Pursuant to RCW 19.146.220(4), the Director may
12 issue orders prohibiting from participation in the conduct of the affairs of a licensed mortgage broker
13 any person subject to licensing under the Act for any violation of the Act.

14 **3.3 Authority to Order Restitution.** Pursuant to RCW 19.146.220(2), the Director may order
15 restitution against any person subject to the Act for any violation of the Act.

16 **3.4 Authority to Impose Fine.** Pursuant to RCW 19.146.220(2), the Director may impose fines
17 against any person subject to the Act for any violation of the Act.

18 **3.5 Authority to Collect Investigation Fee.** Pursuant to RCW 19.146.228(2) and WAC 208-660-
19 550(4)(a), the Department will charge \$48.00 per hour for an examiner's time devoted to an
20 investigation of any person subject to the Act.

21 **3.6 Authority to Recover Costs and Expenses.** Pursuant to RCW 19.146.221(2), the Director
22 may recover the state's costs and expenses for prosecuting violations of 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 and chapter 208-660 WAC, as
3 set forth above constitute a basis for the entry of an Order under RCW 19.146.220, RCW 19.146.221,
4 and RCW 19.146.223. Therefore, it is the Director's intent to ORDER that:

5 **4.1** Respondents Nationwide Audit Service, LLC a/k/a N.A.S., Nuevo Casa Sol, LLC,
6 4Venture, LLC, and Pablo Alberto Vega Velazco a/k/a Alberto Vega a/k/a Pablo Vega
7 a/k/a Pablo Velazco cease and desist engaging in the business of a mortgage broker
8 and/or loan originator.

9 **4.2** Respondents Nationwide Audit Service, LLC a/k/a N.A.S., Nuevo Casa Sol, LLC,
10 4Venture, LLC, and Pablo Alberto Vega Velazco a/k/a Alberto Vega a/k/a Pablo Vega
11 a/k/a Pablo Velazco be prohibited from participation, in any manner, in the conduct of
12 the affairs of any mortgage broker subject to licensure by the Director.

13 **4.3** Respondents Nationwide Audit Service, LLC a/k/a N.A.S., Nuevo Casa Sol, LLC,
14 4Venture, LLC, and Pablo Alberto Vega Velazco a/k/a Alberto Vega a/k/a Pablo Vega
15 a/k/a Pablo Velazco jointly and severally pay restitution to the consumers identified in
16 Appendix A and B to this Statement of Charges in the amounts set forth therein or in an
17 amount to be determined at hearing and that Respondents jointly and severally pay
18 restitution to each Washington consumer with whom they entered into a contract for
19 residential mortgage loan modification services related to real property or consumers
20 located in the state of Washington equal to the amount collected from that Washington
21 consumer for those services in an amount to be determined at hearing.

22 **4.4** Respondents Nationwide Audit Service, LLC a/k/a N.A.S., Nuevo Casa Sol, LLC,
23 4Venture, LLC, and Pablo Alberto Vega Velazco a/k/a Alberto Vega a/k/a Pablo Vega
24 a/k/a Pablo Velazco jointly and severally pay a fine, which as of the date of this
Statement of Charges totals \$18,000.00.

4.5 Respondents Nationwide Audit Service, LLC a/k/a N.A.S., Nuevo Casa Sol, LLC,
4Venture, LLC, and Pablo Alberto Vega Velazco a/k/a Alberto Vega a/k/a Pablo Vega
a/k/a Pablo Velazco jointly and severally pay an investigation fee, which as of the date
of this Statement of Charges totals \$19,627.20.

4.6 Respondents Nationwide Audit Service, LLC a/k/a N.A.S., Nuevo Casa Sol, LLC,
4Venture, LLC, and Pablo Alberto Vega Velazco a/k/a Alberto Vega a/k/a Pablo Vega
a/k/a Pablo Velazco 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.

