ORDER SUMMARY – Case Number: C-14-1532

Name(s): Kevin Michael Killeen

Order Number: C-14-1532-15-FO01

Effective Date: July 14, 2015

License Number: DFI: 33832
Or **NMLS Identifier** [U/L]

License Effect: Denied

Not Apply Until:

Not Eligible Until:

Prohibition/Ban Until:

Investigation Costs	$	Due	Paid ☐ Y ☐ N	Date
Fine	$	Due	Paid ☐ Y ☐ N	Date
Assessment(s)	$	Due	Paid ☐ Y ☐ N	Date
Restitution	$	Due	Paid ☐ Y ☐ N	Date
Judgment	$	Due	Paid ☐ Y ☐ N	Date
Satisfaction of Judgment Filed?		☐ Y ☐ N		
No. of Victims:				

Comments:

State of Washington

DEPARTMENT OF FINANCIAL INSTITUTIONS

IN THE MATTER OF Determining Whether there has been a violation of the Consumer Loan Act of Washington by: KEVIN M. KILLEEN, Respondent.	DFI NO. C-14-1532-15-FO01 OAH NO. 2014-DFI-0032 FINAL DECISION & ORDER DENYING PETITION FOR REVIEW AND AFFIRMING INITIAL ORDER GRANTING SUMMARY JUDGMENT

THIS MATTER comes now before SCOTT JARVIS, Director ("Director") of the WASHINGTON STATE DEPARTMENT OF FINANCIAL INSTITUTIONS ("Department"), pursuant to the Findings of Fact,[1] Conclusions of Law,[2] and Initial Order on Summary Judgment ("Initial Order"), in relation to the Statement of Charges in the above-entitled matter ("Statement of Charges") against KEVIN M. KILLEEN ("Respondent"), on the Petition for Review of Initial Order ("Petition for Review"), brought by Respondent and his counsel of record, Elizabeth de Bagara Steen, Esq. ("Respondent's Counsel"), from the Initial Order by Administrative Law Judge Leslie Birnbaum ("ALJ Birnbaum"), from which the Department's Division of Consumer Services ("Division"), represented by Assistant Attorney General Jong M. Lee ("Division's Counsel"), has lodged a Reply to the Petition for Review of Initial Order ("Reply to Petition");

[1] References herein to specific Findings of Fact of the Initial Order are denoted "FOF."

[2] References to specific Conclusions of Law of the Initial Order are denoted "COL."

and the Director having taken into consideration the entire record on review, including, without limitation, any pleadings, testimony, and recorded oral and written argument before the ALJ, the Initial Order, the Petition for Review, and the Reply to Petition (collectively, the "Record on Review");

NOW, THEREFORE, the Director issues the following Final Decision and Order:

1.0 PROCEDURAL HISTORY

The Statement of Charges was filed July 21, 2014. The Respondent made a timely Request for Administrative Hearing. The matter was then referred to the Office of Administrative Hearings ("OAH") and assigned to ALJ Birnbaum. Respondent filed a Motion to Dismiss with OAH on November 26, 2014. ALJ Birnbaum denied Respondent's Motion to Dismiss, first making an oral ruling on January 5, 2015, followed by a written interlocutory order issued on February 19, 2015. Then the Division filed its Motion for Summary Judgment on January 28, 2015. ALJ Birnbaum granted the Division's Motion for Summary Judgment, first by oral at a hearing held on February 23, 2015, followed by a written order ("Initial Order") issued on March 18, 2015. Respondent then filed his Petition for Review of Initial Order, which was received on April 10, 2014, in a timely manner.

2.0 DIRECTOR'S CONSIDERATION

Notwithstanding all the briefing in this matter, the facts and applicable law in this matter are fairly straightforward and undisputable.

2.1 **Respondent Has No MLO License.** Respondent has not been licensed by the Division since January 1, 2009, when he did not renew his MLO License after its expiration as of December 31, 2008.[3]

2.2 **Timing of Respondent's Employment with Bay Equity LLC.** Bay Equity, LLC ("Bay Equity") is currently licensed by the Division as a Consumer Loan Company and has been so licensed since at least 2010. Bay Equity informed the Division of the following:

2.2.1 Respondent began his employment with Bay Equity March 21, 2012, with a job title of Area Sales Manager;

2.2.2 Respondent's employment location began at Bay Equity's branch in Spanaway, Washington, and then moved, along with the entire branch, to its current Puyallup, Washington location on October 24, 2013; and

2.2.3 Respondent's job title changed from Area Sales Manager to Regional Manager effective February 6, 2014. Respondent's last day of employment with Bay Equity was reported to be December 31, 2014.

Accordingly, as of the filing of the Statement of Charges, July 21, 2014, Respondent was employed by Bay Equity, LLC.

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[3] On or about December 11, 2006, Respondent applied for a mortgage loan originator license ("MLO License") with the Division and disclosed that that he had theft/forgery convictions from 1992.

2.3 Respondent's Prior Felony Convictions. On or about September 28, 1990, Respondent pleaded guilty in Ocean County Superior Court, State of New Jersey, to two counts of Theft by Deception in the Third Degree[4] in violation of the New Jersey Statutes, NJS 2C:20-4,[5] under Case No. 1113-9-90. The plea form identified that these criminal charges carried statutory maximum imprisonment of five (5) years each and maximum fines of $7,500.00 for each charge. A judgment of conviction as to those two counts of Theft by Deception in the Third Degree was also subsequently entered by the same court. The certified court records from New Jersey as to these two convictions are conclusive. These are felony convictions.[6]

2.4 Respondent's Admissions. Respondent has admitted he has a prior felony conviction for theft/forgery, as he stated in his application to the Division for an MLO

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[4] NJS 2C:20-2(b)(2) sets forth the grading of Theft by Deception in the Third Degree, as follows:

> b. Grading of theft offenses.
>
> . . . .
>
> (2) Theft constitutes a crime of the third degree if:
>
> (a) The amount involved exceeds $500.00 but is less than $75,000.00;
>
> (b) The property stolen is a firearm, automobile, boat, horse or airplane;
>
> (c) The property stolen is a controlled dangerous substance or controlled substance analog as defined in N.J.S. 2C:35-2 and the amount involved is less than $75,000.00 or is undetermined and the quantity is one kilogram or less;
>
> (d) It is from the person of the victim;
>
> (e) It is in breach of an obligation by a person in his capacity as a fiduciary;
>
> (f) It is by threat not amounting to extortion; or
>
> (g) It is of a public record, writing or instrument kept, filed or deposited according to law with or in the keeping of any public office or public servant.

[5] The Theft by Deception Statute of the New Jersey Code of Criminal Justice, at NJS 2C:20-4, declares:

> A person is guilty of theft if he purposely obtains property of another by deception. A person deceives if he purposely:
>
> a. Creates or reinforces a false impression, including false impressions as to law, value, intention or other state of mind; but deception as to a person's intention to perform a promise shall not be inferred from the fact alone that he did not subsequently perform the promise;
>
> b. Prevents another from acquiring information which would affect his judgment of a transaction; or
>
> c. Fails to correct a false impression which the deceiver previously created or reinforced, or which the deceiver knows to be influencing another to whom he stands in a fiduciary or confidential relationship. The term "deceive" does not, however, include falsity as to matters having no pecuniary significance, or puffing or exaggeration by statements unlikely to deceive ordinary persons in the group addressed.

[6] NJS 2C:43-6 declares:

> a. Except as otherwise provided, a person who has been convicted of a crime may be sentenced to imprisonment, as follows:
>
> . . . .
>
> (3) In the case of a crime of the third degree, for a specific term of years which shall be fixed by the court and shall be between three years and five years; . . . ."

license.[7] Respondent also conceded in his Motion to Dismiss that he has two felony convictions in New Jersey.[8]

2.5 **Nature of Respondent's Prior Felony Convictions.** Respondent does not dispute that he has prior felony convictions involving fraud, dishonesty, or breach of trust. While Respondent has argued that the felonies could be expunged or vacated had the conduct occurred in Washington State, the conviction has not yet been expunged either in New Jersey or in Washington. Such hypothetical possible actions are not material fact for consideration. Until such a time a competent New Jersey Court grants relief vacating or expunging the felony convictions in question, it is not a material fact relevant for consideration in this case.

2.6 **Scope of Director's Authority to Prohibit.** The Consumer Loan Act declares, as follows:

> (6) ***The director may issue an order*** removing from office or ***prohibiting from participation in the affairs of any licensee***, or both, ***any*** officer, principal, ***employee or loan originator, or any person subject to this chapter for***:
> . . . .
> (b) ***Conviction of a gross misdemeanor involving dishonesty or financial misconduct or a felony***; . . . .[9]

[Emphasis added.]

The Division's Consumer Loan Company Rules state in relevant part, as follows:

> May I employ someone to work with Washington residents or Washington property who has been convicted of a felony, or who has had a lending-related license revoked?
> No. (1) Pursuant to ***RCW 31.04.093(6)***, the director may prohibit any officer, principal, or employee from participating in the affairs of any licensee if that officer, principal, or employee has been

[7] Declaration of Greg Sandoz.

[8] Respondent's Motion to Dismiss, p. 2.

[9] RCW 31.04.093(6).

> convicted of or pled guilty or nolo contendre [contendere] to a felony in a domestic, foreign, or military court:
> (a) During the seven-year period preceding the date of the proposed employment; or
> (2) For purposes of this section, "participation in the affairs of any licensee" means an officer, principal, or ***employee*** or independent contractor who will or does originate loans, supervise employees or independent contractors, or manage the loan production or other activities of the licensee.[10]

[Emphasis added.]

The Director thus has the authority to prohibit Respondent from participation in the conduct of the affairs of any Consumer Loan Company subject to licensure by the Director under the Consumer Loan Act[11] and Consumer Loan Company Rules,[12] in any manner.

Respondent argues that he was not engaged in unlawful conduct when he was charged. However, Bay Equity, LLC, is a Consumer Loan Company Licensee. At the time the Statement of Charges was issued, Mr. Killeen was an employee of Bay Equity, LLC, managing licensed loan originators who are in the business of offering consumer loan services to consumers in Washington State. While specific job duties were not established, it is undisputed that Respondent was employed as a manager within a licensed consumer loan company and performed "activities of a licensee."

The court accords deference to an administrative agency's interpretation of a statute which it sponsored before the Legislature and which it is charged with administering and enforcing, including an interpretation of law in matters involving an agency's special knowledge

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[10] WAC 208-620-371.

[11] Chapter 31.04 RCW.

[12] Chapter 208-620 WAC.

or expertise.[13] Here, however, the plain language of the statute supports the Division's interpretation of the Consumer Loan Act and Division's Consumer Loan Company Rules.

2.7 Consumer Loan Act and the Division's Consumer Loan Company Rules Consistent with Chapter 9.96A RCW. Washington State statute related to restoration of employment rights declares, in relevant part, as follows:

RCW 9.96A.020 (1) allows exception for contrary law

> (1) . . . ***[U]nless there is another provision of law to the contrary***, a person is not disqualified . . . to practice, pursue or engage in any occupation, trade, vocation, or business for which a license, permit, certificate or registration is required to be issued by the state of Washington . . . solely because of a prior conviction of a felony. However, ***this section does not preclude the fact of any prior conviction of a crime from being considered.***[14]

[Emphasis added.]

The above-referenced statute provides that if there is another provision of law to the contrary, a person may be disqualified from engaging in a business for which a license is required on account of a prior conviction of a felony. In this case, the provision of law in question is the prohibition in the Consumer Loan Act against participation in the business affairs of a Consumer Loan Company if one has been convicted of a gross misdemeanor involving dishonesty or financial misconduct or a felony.[15] Thus, the Division's application of the Consumer Loan Act[16] and the Division's Consumer Loan Company Rules[17] is consistent with Chapter 9.96A RCW.

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[13] Cashmere Valley Bank v. State, Dept. of Revenue, 181 Wn.2d 622,635-636, 334 P.3d 1100, 1106-1107 (2014); citing Leonard v. City of Bothell, 87 Wash.2d 847, 557 P.2d 1306 (1976); Impecoven v. Dep't of Revenue, 120 Wash.2d 357, 363, 841 P.2d 752 (1992) [considerable deference given to interpretation by agency charged with enforcing statute]; Chi. Title Ins. Co. v. Office of Ins. Comm'r, 178 Wash.2d 120, 133, 309 P.3d 372 (2013) [special knowledge of agency]. See also Nationscapital Mortg. Corp. v. State Dept. of Financial Institutions, 133 Wash.App. 723, 737-738, 137 P.3d 78, 86 (Div. 2 – 2006).

[14] RCW 9.96A.020 (1).

[15] RCW 31.04.093(6).

[16] *Id.*

2.8 Proper Summary Judgment Standard Applied. Summary judgment is available in administrative actions.[18] A motion for summary judgment may be granted and an order issued if the written record shows that there is no genuine issue as to any material fact and that the moving party is entitled to judgment as a matter of law.[19] A material fact is one upon which the outcome of the litigation depends.[20] The party moving for summary judgment has the burden of showing the absence of any issue of material fact.[21] However, once the moving party has presented competent summary judgment proof, the non-moving party may not rest on mere allegations in its pleadings, but must respond by affidavit or other proper method setting forth specific facts showing that there is a genuine disputed issue of material fact that must be resolved at trial.[22] A non-moving party may not rely on speculation or argumentative assertions that unresolved factual issues remain to be tried.[23] In making this determination, the Court will consider any evidence and inferences therefrom in a light most favorable to the non-moving party.[24] Summary judgment may be granted if reasonable minds could reach only one conclusion

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[17] WAC 208-620-371.

[18] WAC 10-08-135; *Verizon NW, Inc. v. ESD*, 164 Wn.2d 909, 915, 194 P.3d 255 (2008).

[19] WAC 10-08-135 ; *Stewart v. State*, 162 Wn. App. 266, 270, 252 P.3d 920, 922-23 (2011).

[20] *Hudesman v. Foley*, 73 Wn.2d 880, 886, 441 P.2d 532 (1968).

[21] *Vallandigham v. Clover Park School District No. 400*, 154 Wn.2d 16, 26, 109 P.3d 805 (2005).

[22] *McGough v. City of Edmonds*, 1 Wn. App. 164, 168, 460 P.2d 302 (1969).

[23] *White v. State*, 131 Wn.2d 1, 9, 929 P.2d 396 (1997).

[24] *Yakima Fruit & Cold Storage Co. v. Central Heating & Plumbing Co.*, 81 Wn.2d 528, 530, 503 P.2d 108 (1972).

based on the facts in evidence.[25] The object and function of a summary judgment is to avoid a useless trial.[26]

2.9 No Factual Dispute Regarding Nature of Criminal Convictions. It has never been disputed that Respondent was convicted in New Jersey of two felony counts of theft by deception, which are felonies that involved "an act of fraud, dishonesty, breach of trust, or money laundering."[27] The ALJ properly apply the relevant statute and rule to the facts.

2.10 Correct Application of Statutes and Rules. Respondent was an employee of a Consumer Loan Company Licensee. Respondent argues that the relevant statute and rule do not apply to him because he is not a licensee. However, this ignores the plain language of the relevant statute. It has never been disputed that when the Statement of Charges was filed, Respondent was an employee of a Consumer Loan Company Licensee. Respondent's employment ended December 31, 2014, but that alone would not prevent him from being employed with another licensee or exempt him from the relevant statute. The initial Order applies to Respondent regardless of his license status.

2.11 Misconstruing the Initial Order. The phrase "in any manner" was part of the language of the Initial Order. It was never quoted as part of the relevant statute or rule. Its usage in the Division's Statement of Charges, as part of the prayer or relief requested, does not change the relevant statute and rule in this case nor should it be construed as doing so. Contrary to Respondent's argument here, the Director finds no error. The Respondent claims the Initial Order prohibits the licensee from working as a mortgage loan originator. This is an incorrect

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[25] *Vallandigham*, 154 Wn.2d at 26.

[26] *Hudesman*, 73 Wn.2d at 886.

[27] COL 5:11.

statement. Rather, it clearly states that "Mr. Killeen is prohibited from participation in the conduct of the affairs of any consumer loan company subject to licensure by the director under chapter 31.04 RCW and chapter 208-620 WAC, in any manner."[28]

2.12 <u>There Was No Fine</u>. There was no fine, restitution, or fee directed by the Initial Order. There was no fine, restitution or fee requested by the Statement of Charges. Respondent's employer is not a party to this case. There is no case record regarding any $50,000 fine. It is improper for the Director to review this case in light of purported facts from another matter, which is neither part of the record in this case nor pending before the Director.

All other arguments of the Respondent bearing on the issue before the Director – the propriety of the ALJ's Initial Order – are without merit.

Accordingly, the Director having considered the arguments in both the Petition for Review and the Reply to the Petition in light of the Record on Review, the Director now makes the following Findings of Fact and Conclusions of Law:

3.0 FINDINGS OF FACT & CONCLUSIONS OF LAW

3.1 <u>Findings of Fact</u>. The Director hereby affirms and incorporates herein FOF 4.1 through 4.14, inclusive,[29] of the Initial Order.

3.2 <u>Conclusions of Law</u>. The Director hereby affirms and incorporates herein COL 5.1 through 5.13, inclusive,[30] together with Paragraph 6.1[31] of the Initial Order.

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[28] *See* Initial Order, ¶6.1.

[29] Initial Order, pp. 3-5.

[30] Initial Order, pp. 5-8.

[31] Initial Order, p. 9.

4.0 FINAL DECISION & ORDER

WHEREFORE, the Director having made Findings of Fact and Conclusions of Law, IT IS HEREBY ORDERED THAT:

4.1 Summary Judgment Affirmed. Respondent's Petition for Review is denied and the ALJ's Initial Order Granting Summary Judgment is affirmed.

4.2 Order of Prohibition. Respondent, KEVIN M. KILLEEN, is prohibited from participation in the conduct of the affairs of any Consumer Loan Company subject to licensure by the Director under the Washington Consumer Loan Act, chapter 31.04 RCW, and the Rules for Washington Consumer Loan Companies, chapter 208-620 WAC.

5.0 RECONSIDERATION

Pursuant to RCW 34.05.470, Respondent has 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 this Final Order upon Respondent. 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. A timely Petition for Reconsideration is deemed denied if, within twenty (20) days from the date the petition is filed, the agency does not (a) dispose of the petition or (b) serve the parties with a written notice specifying the date by which it will act on a petition.

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6.0 STAY OF ORDER

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

7.0 JUDICIAL REVIEW

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

8.0 SERVICE

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

9.0 EFFECTIVENESS AND ENFORCEMENT OF FINAL ORDER

Pursuant to the Administrative Procedures Act, at RCW 34.05.473, this Final Decision and Order shall be effective immediately upon deposit in the United States Mail.

Dated at Tumwater, Washington, on this 14th day of July, 2015.

WASHINGTON STATE DEPARTMENT
OF FINANCIAL INSTITUTIONS

By: [redacted]

Scott Jarvis, Director

NOTICE TO THE PARTIES

In accordance with RCW 34.05.470 and WAC 10-08-215, any Petition for Reconsideration of this FINAL DECISION & ORDER must be filed with the Director within ten (10) days of service of this FINAL DECISION & ORDER. It should be noted that Petitions for Reconsideration do not stay the effectiveness of said FINAL DECISION & ORDER. Judicial Review of this FINAL DECISION & ORDER is available to a party according to provisions set out in the Washington Administrative Procedure Act, RCW 34.05.570.

This is to certify that this FINAL DECISION & ORDER has been served upon the following parties on July 14, 2015, by depositing a copy of same in the United States mail, postage prepaid.

WASHINGTON STATE DEPARTMENT
OF FINANCIAL INSTITUTIONS

By: [redacted]
Susan Putzier
Executive Assistant to the Director

Mailed to the following:

Kevin M. Killeen
c/o Elizabeth de Bagara Steen
Washington Business Advocates, PLLC
1001 Fourth Avenue, Suite 3200
Seattle, WA 98154

Jong Lee, Esq.
Assistant Attorney General
1125 Washington Street NE
P.O. Box 40100
Olympia, WA 98504

Elizabeth de Bagara Steen, Esq.
Washington Business Advocates, PLLC
1001 Fourth Avenue, Suite 3200
Seattle, WA 98154

STATE OF WASHINGTON
DEPARTMENT OF FINANCIAL INSTITUTIONS
DIVISION OF CONSUMER SERVICES

IN THE MATTER Under the Consumer Loan Act of Washington RE: KEVIN M. KILLEEN, Respondent.	No. C-14-1532-14-SC01 STATEMENT OF CHARGES and NOTICE OF INTENTION TO ENTER AN ORDER TO PROHIBIT FROM INDUSTRY

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 Director Deborah Bortner, institutes this proceeding and finds as follows:

I. FACTUAL ALLEGATIONS

1.1 Kevin M. Killeen (Respondent) is employed by Bay Equity, LLC as a Regional Manager, but is not licensed as a Mortgage Loan Originator (MLO) by the Department of Financial Institutions (Department) under the Consumer Loan Act (Act).

1.2 Bay Equity, LLC, License # CL-76988 (Bay Equity), is a consumer loan company licensed by the Department of Financial Institutions (Department). On or about February 19, 2014, Bay Equity provided the Department with employment information regarding Respondent, specifically:

A. Respondent was hired as an Area Sales Manager with his first day of employment March 21, 2012;

B. Respondent initially worked out of the office located at 222 162nd Street S., Spanaway, Washington 98387;

C. Respondent's place of employment moved, along with the entire Spanaway office to 615 Pioneer Ave. E., STE 201-206, Puyallup, Washington on October 24, 2013; and

D. Respondent's job title changed to Regional Manager effective February 6, 2014.

1.2 Prior Felony Conviction. On or about September 28, 1990, Respondent plead guilty to two felony counts involving fraud, dishonesty, or breach of trust in Case No. 1113-9-90, in Ocean County Superior Court, State of New Jersey. The Ocean County Superior Court also entered a Judgment of Conviction against Respondent on this same date regarding these criminal charges.

1.3 Ongoing Investigation. The Department's investigation is still ongoing.

II. GROUNDS FOR ENTRY OF ORDER

2.1 Requirement of No Prior Felony Convictions Involving Fraud, Dishonesty or Breach of Trust. Based on the Factual Allegations set forth in Section I above, the Respondent's felony convictions involving acts of fraud, dishonesty and/or breach of trust permit the Director to issue an order prohibiting Respondent from participation in the affairs of any licensee subject to the Act pursuant to RCW 31.04.093(6) and WAC 208-620-371.

III. AUTHORITY TO IMPOSE SANCTIONS

3.1 Authority to Prohibit from Industry. Pursuant to RCW 31.04.093(6) and WAC 208-620-371, the Director may issue orders prohibiting from participation in the conduct of the affairs of any licensee any employee or any person subject to this chapter for conviction of a gross misdemeanor involving dishonesty or financial misconduct or a felony.

IV. NOTICE OF INTENTION TO ENTER ORDER

Respondent's violations of the provisions of chapter 31.04 and chapter 208-620 WAC, as set forth in the above Factual Allegations, Grounds for Entry of Order, and Authority to Impose

Sanctions, constitute a basis for the entry of an Order under RCW 31.04.093, RCW 31.04.165, RCW and RCW 31.04.205. Therefore, it is the Director's intention to ORDER that:

4.1 Respondent Kevin M. Killeen be prohibited from participation in the conduct of the affairs of any consumer loan company subject to licensure by the Director under chapter 31.04 and chapter 208-620, in any manner.

V. AUTHORITY AND PROCEDURE

This Statement of Charges and Notice of Intention to Enter an Order to Prohibit from Industry (Statement of Charges) is entered pursuant to the provisions of RCW 31.04.093, RCW 31.04.165, and RCW 31.04.202, and is subject to the provisions of chapter 34.05 RCW (The Administrative Procedure Act). Respondent may make a written request for a hearing as set forth in the NOTICE OF OPPORTUNITY TO DEFEND AND OPPORTUNITY FOR HEARING accompanying this Statement of Charges.

Dated this 21st day of July, 2014.

[redacted]

DEBORAH BORTNER
Director
Division of Consumer Services
Department of Financial Institutions

Presented by:

[redacted]

GREGORY SANDOZ
Financial Legal Examiner

Approved by:

[redacted]

CHARLES CLARK
Enforcement Chief