IN THE MATTER OF:	BEFORE THE MARYLAND COMMISSIONER OF FINANCIAL REGULATION
LIBERTY ONE MORTGAGE, L.L.C., **JUSTIN WILLIAMS,** **BILLY COLFAX, and** **DAVID WUEST** Respondents.	Case No.: CFR-FY2014-0086

SUMMARY ORDER TO CEASE AND DESIST

WHEREAS, the Office of the Commissioner of Financial Regulation, under the supervision of the Deputy Commissioner of Financial Regulation (the "Deputy Commissioner"), undertook an investigation into the mortgage lending and mortgage origination business activities of Liberty One Mortgage, L.L.C. ("Liberty One"), Justin Williams ("Williams"), Billy Colfax ("Colfax"), and David Wuest ("Wuest") (collectively the "Respondents"); and

WHEREAS, as a result of that investigation, the Deputy Commissioner finds grounds to allege that Respondents violated Title 11, Subtitle 5 of the Financial Institutions Article ("FI"), Annotated Code of Maryland (the Maryland Mortgage Lender Law, or "MMLL"), Title 11, Subtitle 6 of the Financial Institutions Article, Annotated Code of Maryland (the Maryland Mortgage Originators Law, or "MMOL"), Title 7, Subtitle 4 of the Real Property Article ("RP"), Title 12, Subtitle 8 of the Commercial Law Article ("CL"), Annotated Code of Maryland (the Maryland Finder's Fee Law or "MFFL"), Annotated

Code of Maryland (the Maryland Mortgage Fraud Protection Act, or "MMFPA"), and Title 11, Subtitles 2 and 3 of the Financial Institutions Article, Annotated Code of Maryland, as well as violating Maryland law prohibiting the commission of acts resulting in fraud and/or theft, and the Deputy Commissioner finds that action under FI §§ 2-115, 11-517, and 11-615, and RP §§ 7-319.1 and 7-404.1 is appropriate.

NOW, THEREFORE, the Deputy Commissioner has determined, for the reasons set forth below, that Respondents are in violation of Maryland law, and that it is in the public interest that Respondents immediately cease and desist from originating, brokering, lending, mitigating, or engaging in any other activities involving Maryland mortgage loans or otherwise pertaining to the mortgage industry in Maryland.

1. FI §§ 2-115(a) and (b) set forth the Commissioner of Financial Regulation's (the "Commissioner") general authority to issue summary cease and desist orders, and to take additional actions for violations of laws, regulations, rules, and orders over which the Commissioner has jurisdiction (in addition to taking any other action permitted by law, and subject to a hearing or waiver of hearing), providing as follows:

> (a) *Summary cease and desist orders.*– When the Commissioner determines that a person has engaged in an act or practice constituting a violation of a law, regulation, rule or order over which the Commissioner has jurisdiction, and that immediate action against the person is in the public interest, the Commissioner may in the Commissioner's discretion issue, without a prior hearing, a summary order directing the person to cease and desist from engaging in the activity, provided that the summary cease and desist order gives the person:
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> (1) Notice of the opportunity for a hearing before the Commissioner to determine whether the summary cease and desist order should be vacated, modified, or entered as final; and
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> (2) Notice that the summary cease and desist order will be entered as final if the person does not request a hearing within 15 days of receipt of the summary cease and desist order.

(b) *Other authorized actions for violations.*– When the Commissioner determines after notice and a hearing, unless the right to notice and a hearing is waived, that a person has engaged in an act or practice constituting a violation of a law, regulation, rule or order over which the Commissioner has jurisdiction, the Commissioner may in the Commissioner's discretion and in addition to taking any other action authorized by law:

(1) Issue a final cease and desist order against the person;
(2) Suspend or revoke the license of the person;
(3) Issue a penalty order against the person imposing a civil penalty up to the maximum amount of $1,000 for a first violation and a maximum amount of $5,000 for each subsequent violation; or
(4) Take any combination of the actions specified in this subsection.

2. FI §§ 2-114(a) and (b) set forth the Commissioner's general authority to order the production of information, as well as documents and records, while investigating potential violations of laws, regulations, rules, and orders over which the Commissioner has jurisdiction (which is in addition to the Commissioner's specific investigatory authority set forth in various other Maryland statutes and regulations). Thus, FI § 2-114(a)(2) provides that the Commissioner may "[r]equire … a person to file a statement in writing, under oath or otherwise as the Commissioner determines, as to all the facts and circumstances concerning the matter to be investigated." Further, pursuant to FI § 2-114(b), "the Commissioner or an officer designated by the Commissioner may," among other things, "take evidence, and require the production of books, papers, correspondence, memoranda, and agreements, or other documents.

3. FI § 11-501, provides the following definitions:

(i) *Mortgage broker.* – "Mortgage broker" means a person who:
(1) For a fee or other valuable consideration, whether received directly or indirectly, aids or assists a borrower in obtaining a mortgage loan; and
(2) Is not named as a lender in the agreement, note, deed of trust, or other evidence of the indebtedness.

(j) *Mortgage lender.* –

(1) "Mortgage lender" means any person who:
(i) Is a mortgage broker;
(ii) Makes a mortgage loan to any person; or
(iii) Is a mortgage servicer.

* * *

(k) *Mortgage lending business.* –
(1) "Mortgage lending business" means the activities set forth in the definition of "mortgage lender" in subsection (j) of this section which require that person to be licensed under this subtitle.
(2) "Mortgage lending business" includes the making or procuring of mortgage loans secured by a dwelling or residential real estate located outside Maryland.

4. Pursuant to FI § 11-504, "[a] person may not act as a mortgage lender unless the person is . . . (1) [a] licensee . . . or (2) [a] person exempted from licensing under this subtitle."

5. Pursuant to FI § 11-515(c), the Commissioner may require a per-day fee for each employee engaged in an ". . . investigation conducted under this section that the Commissioner reasonably considers necessary."

6. Pursuant to FI § 11-517(a), the Commissioner, in part, may suspend or revoke a mortgage lender license if the licensee or any owner, director, officer, member, partner, stockholder, employee, or agent of the licensee 1) in connection with any mortgage loan or loan application transaction commits any fraud, engages in any illegal or dishonest activities, or misrepresents or fails to disclose any material facts to anyone entitled to that information, 2) violates any provision of the MMLL or any rule or regulation adopted under it or any other law regulating mortgage loan lending in the State of Maryland, or 3) otherwise demonstrates unworthiness, bad faith, dishonesty, or any other quality that indicates that the business of the licensee has not been or will not be conducted honestly, fairly, equitably, and efficiently.

7. Additionally, pursuant to FI § 11-517(c), the Commissioner may enforce the provisions of the MMLL, and applicable regulations, by issuing an order (i) requiring a violator to cease and desist from any violation of the MMLL and any further similar violation; and (ii) requiring a violator to take affirmative action to correct any violation, including the restitution of money or property to any person aggrieved by any violation. Additionally, the Commissioner may impose a civil penalty not exceeding $5,000 for each violation, as well as $5,000 for each subsequent violation.

8. FI § 11-523 provides additional penalties for violations of the MMLL, as follows:

> (a) *Willful violations.* – Any person who willfully violates any provision of this subtitle or any rule or regulation adopted under it is guilty of a felony and on conviction is subject to a fine not exceeding $50,000 or imprisonment not exceeding 10 years or both.
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> (b) *Unlicensed persons.* – Any unlicensed person who is not exempt from licensing under this subtitle who makes or assists a borrower in obtaining a mortgage loan in violation of this subtitle may collect only the principal amount of the loan and may not collect any interest, costs, finder's fees, broker fees, or other charges with respect to the loan.
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> (c) *Misappropriation or conversion; penalty.* – Any mortgage lender or employee or agent of a mortgage lender who willfully misappropriates or intentionally and fraudulently converts to the mortgage lender's or to the mortgage lender's employee's or agent's own use moneys in excess of $300 rightfully belonging to a borrower, or who otherwise commits any fraudulent act in the course of engaging in the mortgage lending business is guilty of a felony and on conviction is subject to a fine not to exceed $100,000 or imprisonment not exceeding 15 years or both.

9. Pursuant to Code of Maryland Regulations ("COMAR") 09.03.06.20(A), the Commissioner has promulgated a good faith and fair dealing requirement upon each and every mortgage lender, which states in part: "[a] licensee has a duty of good faith and fair dealing in communications, transactions, and course of dealings with a borrower in

connection with the advertisement, solicitation, making, servicing, purchase, or sale of any mortgage loan . . ."

10. Pursuant to FI § 11-601(q), "mortgage loan originator" is defined as follows:

> (1) "Mortgage loan originator" means an individual who for compensation or gain, or in the expectation of compensation or gain:
> (i) Takes a loan application; or
> (ii) Offers or negotiates terms of a mortgage loan.
> (2) "Mortgage loan originator" does not include an individual who:
> (i) Acts solely as a mortgage loan processor or underwriter;
> (ii) Performs only real estate brokerage activities and is licensed in accordance with Title 17 of the Business Occupations and Professions Article, unless the individual is compensated by a mortgage lender, a mortgage broker, or other mortgage loan originator or by any agent of a mortgage lender, mortgage broker, or other mortgage loan originator; or
> (iii) Is involved solely in extensions of credit relating to timeshare plans, as that term is defined in 11 U.S.C. § 101(53d).

11. Pursuant to FI § 11-601(r), "mortgage loan processor or underwriter" is defined as follows:

> (1) "Mortgage loan processor or underwriter" means an individual who performs clerical or support duties as an employee of, at the direction of, and subject to the supervision and instruction of a person licensed, or exempt from licensing, under Title 5 of this article.
> (2) "Mortgage loan processor or underwriter" does not include an individual who:
> (i) Represents to the public, through advertising or other means of communication including the use of business cards, stationery, brochures, signs, rate lists, or other promotional items, that the individual can or will perform any of the activities of a mortgage loan originator; or
> (ii) Performs mortgage loan processing or underwriting activities as an independent contractor.

12. Pursuant to FI § 11-602(b), "[u]nless exempted from this subtitle under subsection (d) of this section, an individual may not engage in the business of a mortgage loan originator unless the individual holds a valid license issued under this subtitle." In

addition, pursuant to FI § 11-603(b), for a "licensee to act as a mortgage loan originator," he/she must be, "acting within the scope of employment with . . . (1) [a] mortgage lender . . . or (2) [a] person who is exempt from licensing as a mortgage lender.

13. Pursuant to FI § 11-615(a), the Commissioner, in part, may suspend or revoke a loan originator license if the licensee 1) in connection with any mortgage loan or loan application transaction commits any fraud, engages in any illegal or dishonest activities, or misrepresents or fails to disclose any material facts to anyone entitled to that information, 2) violates any provision of MMOL, or any rule or regulation adopted under it or any other law regulating mortgage loan lending or mortgage origination in the State of Maryland, or 3) otherwise demonstrates unworthiness, bad faith, dishonesty, or any other quality that indicates that the business of the licensee has not been or will not be conducted honestly.

14. In addition, pursuant to FI § 11-615(c), the Commissioner may enforce the provisions of the MMOL, and applicable regulations, by issuing an order (i) requiring a licensee to cease and desist from any violations of the MMOL and any further similar violations; and (ii) requiring a licensee to take affirmative action to correct the violation, including the restitution of money or property to any person aggrieved by the violation. Additionally, the Commissioner may impose a civil penalty not exceeding $5,000 for each violation, as well as $5,000 for each subsequent violation.

15. Pursuant to COMAR 09.03.09.04(A), the Commissioner has promulgated a good faith and fair dealing requirement upon each and every mortgage loan originator, which states in part: "[a] mortgage originator has a duty of good faith and fair dealing in communications and transactions with a borrower. . . "

16. Pursuant to CL § 12-801(d), "'Finder's fee means any compensation or commissioner directly or indirectly imposed by a broker and paid by or on behalf of the borrower for the broker's services in procuring, arranging, or otherwise assisting a borrower in obtaining a loan or advance of money."

17. CL § 12-805 (d) provides:

> (1) A finder's fee may not be charged unless it is pursuant to a written agreement between the mortgage broker and the borrower which is separate and distinct from any other document
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> (2) The terms of the proposed agreement shall be disclosed to the borrower before the mortgage broker undertakes to assist the borrower in obtaining a loan or advance of money and shall specify the amount of the finder's fee.

18. Pursuant to CL § 12-806, "a borrower is entitled to a refund of any finder's fee paid to a mortgage broker if . . . [t]he loan transaction is not made to the borrower."

19. CL § 12-807 provides:

> Any mortgage broker who violates any provision of this subtitle shall forfeit to the borrower the greater of:
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> (1) Three times the amount of the finder's fee collected; or
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> (2) The sum of $500.

20. Pursuant to RP § 7-401(d), "mortgage fraud" is defined as follows:

> (d) *Mortgage Fraud.*– "Mortgage fraud" means any action by a person made with the intent to defraud that involves:
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> (1) Knowingly making any deliberate misstatement, misrepresentation, or omission during the mortgage lending process with the intent that the misstatement, misrepresentation, or omission be relied on by a mortgage lender, borrower, or any other party to the mortgage lending process;
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> (2) Knowingly creating or producing a document for use during the mortgage lending process that contains a deliberate misstatement, misrepresentation, or omission with the intent that the document

containing the misstatement, misrepresentation, or omission be relied on by a mortgage lender, borrower, or any other party to the mortgage lending process;
(3) Knowingly using or facilitating the use of any deliberate misstatement, misrepresentation, or omission during the mortgage lending process with the intent that the misstatement, misrepresentation, or omission be relied on by a mortgage lender, borrower, or any other party to the mortgage lending process;
(4) Receiving any proceeds or any other funds in connection with a mortgage closing that the person knows resulted from a violation of item (1), (2), or (3) of this section;
(5) Conspiring to violate any of the provisions of item (1), (2), (3), or (4) of this section; or
(6) Filing or causing to be filed in the land records in the county where a residential real property is located, any document relating to a mortgage loan that the person knows to contain a deliberate misstatement, misrepresentation, or omission.

21. Pursuant to RP § 7-401(e), "mortgage lending process" is defined as follows:

(e) *Mortgage lending process.–*
(1) "Mortgage lending process" means the process by which a person seeks or obtains a mortgage loan.
(2) "Mortgage lending process" includes:
(i) The solicitation, application, origination, negotiation, servicing, underwriting, signing, closing, and funding of a mortgage loan; and
(ii) The notarizing of any document in connection with a mortgage loan.

22. Pursuant to RP § 7-402, "[a] person may not commit mortgage fraud."

23. Pursuant to RP § 7-404.1, the Commissioner may enforce the provisions of the MMFPA, and applicable regulations, by issuing an order (i) requiring a licensee to cease and desist from any violations of the MMFPA and any further similar violations; and (ii) requiring a licensee to take affirmative action to correct the violation, including the restitution of money or property to any person aggrieved by the violation. Additionally, the Commissioner may impose a civil penalty not exceeding $1,000 for each violation the MMFPA, as well as $5,000 for each subsequent violation.

24. It is a violation of Maryland law, through fraud and deceit, to make false representations to another; if those false representations were either known or made with reckless indifference as to their truth, the misrepresentations were made for the purpose of defrauding another, another relied on those misrepresentation and had the right to rely on them, and the individual suffered compensable injury resulting from the misrepresentations.

25. It is a violation of Maryland law to commit theft of property. More specifically, it is against the law for an individual to willfully or knowingly obtain/exert unauthorized control over another's property, or through deception intend to deprive another of his/her property.

26. Pursuant to Title 7, Sections 202 and 203 of the Corporations and Associations Article ("CA"), Annotated Code of Maryland, a foreign corporation is required to either register or qualify, unless exempt from this requirement, with the Maryland Department of Assessments and Taxation ("DAT") prior to doing business in the State of Maryland. Further, a foreign corporation must maintain such registration or qualification at all times while operating and engaging in business activities within the State.

27. In the present matter, in April 2014, the Deputy Commissioner began an investigation into the business activities of the Respondents after receiving a consumer complaint. Pursuant to this investigation, the Deputy Commissioner developed reasonable grounds to believe that Respondents provided unlicensed mortgage lending and loan origination services related to Maryland residential real property and/or involving Maryland consumers, and engaged in a fraudulent mortgage re-finance scheme resulting in theft and/or fraud, in violation of various provisions of Maryland Law, including, but not limited to, the

MMLL, MMOL, MMFPA, and FI, Title 11, Subtitles 2 and 3, as well as violating Maryland law prohibiting the commission of acts resulting in fraud and/or theft.

28. The Agency's investigation determined that Respondents Williams, Colfax, and Wuest engaged in mortgage-related business activities in the State of Maryland involving Maryland residential real property.

29. More specifically, the Agency investigation revealed that the Respondents engaged in unlicensed mortgage origination and mortgage brokering activities in perpetration of a mortgage fraud scheme which involved the following:

a. That Respondents Williams, Colfax, and Wuest are owners, directors, officers, managers, employees and/or agents of Respondent Liberty One. Respondent Liberty One is not registered as a foreign business entity with the Maryland Department of Assessments and Taxation;

b. That in January 2014, [redacted] (collectively Consumers A) entered into an agreement with the Respondents, to obtain a mortgage loan to refinance a piece of real property in Springdale, Maryland;

c. That Consumers A, at the direction of the Respondents, completed a loan application for a mortgage refinance, and turned the application over to the Respondents;

d. That, subsequent to the submission of the loan application, the Respondents informed Consumers A that they were approved for the loan and that Consumers A were required to pay $1,500 to Respondents in order to obtain the loan.

Consumers A paid this amount to Respondents via personal check on or about January 30, 2014;

e. That Respondents never submitted Consumers A's loan application to any lender, nor did they ever provide any of the loan origination and/or mortgage brokering services for which they had contracted to provide to Consumers A;

f. That Respondents since have failed to refund the $1,500 they collected from Consumers A, in violation of CL § 12-806(1);

g. That Respondents' activities discussed above constituted a theft/fraud upon Consumers A and that such theft/fraud was conducted through a mortgage fraud scheme;

h. That at no time relevant to the facts set forth in this Summary Order to Cease and Desist (the "Summary Order") have Respondents been licensed by the Commissioner under either the MMLL or MMOL. By advertising and contracting with Maryland consumers to perform mortgage brokering and/or loan origination services, including processing loan applications, Respondents acted as an unlicensed mortgage lender and/or unlicensed mortgage loan originator;

i. That Respondents did not show good faith and fair dealing in their communications and transactions with Maryland consumers, which constitutes a violation of COMAR 09.03.06.20(A) and COMAR 09.03.09.04(A);

j. That by knowingly making deliberate misstatements, misrepresentations, and/or omissions during the mortgage lending process with the intent to defraud their clients, Respondents have committed mortgage fraud in violation of Title 7, Subtitle 4 of the Real Property Article, including, but not limited to, RP § 7-402;

k. That Respondents' activities discussed above constitute a theft and/or fraud upon Maryland consumers and that such theft and/or fraud was conducted through a mortgage/loss mitigation fraudulent scheme;

l. That Respondents committed theft of property. Respondents willfully and/or knowingly obtained/exerted unauthorized control over Maryland consumers' property, and/or through deception intended to deprive those consumers of their property; and

m. That Respondents, through fraud and deceit: 1) made false representations to Maryland consumers; 2) those false representations were either known to Respondent or that the they were made with reckless indifference as to their truth; 3) the misrepresentations were made for the purpose of defrauding those consumers; 4) the consumers relied on those misrepresentation and they had the right to rely on them; and (5) these consumers suffered compensable injury resulting from the misrepresentation. This commission of fraud constitutes a violation of the duty of good faith and fair dealing under COMAR 09.03.06.20(A) and COMAR 09.03.09.04(A);

27. Based on the foregoing, it has been determined that the Respondents are in violation of Maryland law, including, but not limited to, the MMLL, the MMOL, the MFFL, and the MMFPA, and corresponding regulations, as well as Maryland law prohibiting the commission of acts resulting in fraud and/or theft, and accordingly, administrative action is appropriate.

WHEREFORE, having determined that immediate action is in the public interest, and pursuant to the aforementioned provisions of the Annotated Code of Maryland and

associated regulations, it is, by the Maryland Deputy Commissioner of Financial Regulation, hereby

ORDERED that Respondents shall immediately **CEASE** and **DESIST** from engaging in any of the following: any and all activities which constitute a mortgage lending business as defined in FI § 11-501(k), including acting as a mortgage broker as defined under FI § 11-501(i) or as a mortgage lender as defined under FI § 11-501(j); acting as a mortgage originator as defined in FI § 11-601(q); or in any other way acting as a mortgage lender, broker, or originator in the State of Maryland or with Maryland residents, either by acting directly, or by acting indirectly through other individuals or business entities; and it is

ORDERED that Respondents shall immediately **CEASE** and **DESIST** from violating the aforementioned statutory provisions of Maryland law, including, but not limited to the MMLL, MMOL, MMFPA, and Title 11, Subtitles 2 and 3 of the Financial Institutions Article; and that the Respondents should be assessed statutory monetary penalties and ordered to provide restitution for such violations; and it is further

ORDERED that all provisions of this Summary Order, including all orders and notices set forth herein, shall also apply to all unnamed partners, employees, and/or agents of the Respondent business entity; and it is further

ORDERED that Respondents shall provide a copy of this Summary Order to all unnamed partners, employees and/or agents of the Respondent business entity; furthermore,

RESPONDENTS ARE HEREBY NOTIFIED that, pursuant to FI §§ 2-115, 11-518, and 11-616, CL § 14-1911, and RP §§ 7-319.1 and 7-404.1, Respondents are entitled to a hearing before the Commissioner to determine whether this Summary Order should be vacated, modified, or entered as a final order of the Commissioner; and further,

RESPONDENTS ARE HEREBY NOTIFIED that, pursuant to FI § 2-115, CL § 14-1911, and RP § 7-319.1, this Summary Order will be entered as a final order of the Commissioner if Respondents do not request a hearing within 15 days of the receipt of this Summary Order; and further,

RESPONDENTS ARE HEREBY NOTIFIED that, pursuant to Code of Maryland Regulations ("COMAR") § 09.01.02.08, and State Government Article ("SG") §§ 9-1607.1, 10-206.1, and 10-207, and in accordance with SG § 10-207(b)(4), an individual Respondent is only permitted to request a hearing, and to appear at such hearing, on behalf of himself, or through an attorney authorized to practice law in Maryland at Respondent's own expense; and further,

RESPONDENTS ARE HEREBY NOTIFIED that, pursuant to SG §§ 9-1607.1 and 10-206.1, and in accordance with SG § 10-207(b)(4), business entities are only permitted to request a hearing, and to appear at such hearing, through an attorney authorized to practice law in Maryland at Respondent's own expense; and further,

RESPONDENTS ARE HEREBY NOTIFIED that any and all requests for a hearing in this matter must conform to the requirements stated above, must be made in the form of a signed, written request, and must be submitted to the following address:

Administrator
Enforcement Unit
Office of the Commissioner of Financial Regulation
500 North Calvert Street, Suite 402
Baltimore, Maryland 21202;

and further,

THE RESPONDENTS ARE HEREBY NOTIFIED that, pursuant to FI §§ 2-115(b) 11-517(c), and 11-615(c), and RP §§ 7-319.1 and 7-404.1, as a result of a hearing, or

of the Respondents' failure to correctly request a hearing in the manner described above, the Commissioner may, in the Commissioner's discretion, and in addition to taking any other action authorized by law, take the following actions: enter an order making this Summary Order final; issue an order requiring that the Respondents refund all interest, costs, originator fees, broker fees, and/or other charges paid by Maryland consumers to the Respondents in conjunction with residential mortgage loans that were originated, brokered, or closed during periods when the Respondents did not hold the appropriate licenses under the MMLL and/or the MMOL; issue an order requiring Respondents to take affirmative action to correct the violations described herein, including providing restitution of money or property to any person aggrieved by these violations; issue a penalty order against Respondents imposing a civil penalty up to $5,000 for each violation of the MMLL, the MMOL and/or the MMFPA, and corresponding regulations; issue a penalty order against Respondents imposing a civil penalty up to $1,000 for each violation of the FI §§ 2-114; issue a penalty order against the Respondents imposing a civil penalty up to $5,000 for each subsequent violation of these laws; or may take any combination of the aforementioned actions against the Respondents. The Commissioner may also enter a final order pursuant to FI §§ 11-517(c)(i)(2) and 11-615(c)(i)(2), requiring Respondents to refund to Maryland consumers all money and other valuable consideration that consumers paid to Respondents, and if applicable to their partners, employees, and/or agents. In addition, pursuant to CL § 12-807, as a result of Respondents' failure to comply with requirements imposed under the MFFL, the Commissioner may also enter an order requiring Respondents to pay consumers a monetary award equal to 3 times the total amount of the finder's fee collected from the

consumers. The Commissioner may also refer this matter to the appropriate law enforcement agency for criminal prosecution for the violations described herein.

MARYLAND COMMISSIONER OF FINANCIAL REGULATION

8/11/2015
Date

By: Keisha Whitehall Wolfe
Acting Deputy Commissioner