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8
9 BEFORE THE DEPARTMENT OF BUSINESS OVERSIGHT
10 OF THE STATE OF CALIFORNIA

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12 In the Matter of the Accusation of:
THE COMMISSIONER OF BUSINESS
13 OVERSIGHT,

14 Complainant,

15 vs.

16 GOTMORTGAGE.COM, doing business as
17 PERFORMANCE CAPITAL GROUP,

18 Respondent.

) OAH CASE No. 2015120913

) CFLL LICENSE No. 603-A922

) FIRST AMENDED ACCUSATION IN
) SUPPORT OF NOTICE OF INTENTION TO
) ISSUE ORDER REVOKING OR, IN THE
) ALTERNATIVE, SUSPENDING FINANCE
) LENDERS LICENSE

) Hearing Dates: 06/27/16-06/29/16
) Judge: Matthew Goldsby

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21 In the Matter of the Order to Discontinue
Violations of: THE COMMISSIONER OF
22 BUSINESS OVERSIGHT,

23 Complainant,

24 vs.

25
26 GOTMORTGAGE.COM, doing business as
PERFORMANCE CAPITAL GROUP,

27 Respondent.
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1 Jan Lynn Owen, the Commissioner of Business Oversight (“Commissioner”), is informed and
2 believes, and based upon such information and belief, alleges and charges Respondent as follows:

3 **I**

4 **Jurisdiction and Venue**

5 1. The Commissioner brings this action under the provisions of Financial Code section
6 22714.

7 2. The Commissioner is authorized to administer and enforce the provisions of the
8 California Finance Lenders Law (Fin. Code, § 22000 et seq.) (“CFL”).

9 **II**

10 **Statement of Facts**

11 3. GotMortgage.com, doing business as Performance Capital Group
12 (“GotMortgage.com”), is a mortgage lender licensed by the Commissioner under the CFL.

13 4. GotMortgage.com’s principal place of business is located at 17220 Newhope Street,
14 Suite 213, Fountain Valley, California.

15 5. Andrea Park (“Park”) is GotMortgage.com’s president.

16 6. The Commissioner commenced a regulatory examination of the business on or about
17 October 9, 2013, which disclosed the following violations of the CFL:

18 7. **Recording Fee Overcharges**

19 GotMortgage.com had overcharged borrowers’ recording fees in approximately 17 of the 20
20 loan files reviewed by the Commissioner during the examination, an exception rate of at least 85%, in
21 violation of Financial Code section 22336, subdivision (a).

22 a. For example, in loan file number 230213142, line 1201 of the borrower’s final HUD-1
23 disclosed recording fees totaling \$130.00. But a review of the recorded deed of trust showed
24 government recording fees of only \$37.00, or a difference of \$93.00.

25 b. In another example, loan file number 23122177, GotMortgage.com charged the
26 borrower recording fees totaling \$95.00. But the deed of trust disclosed actual fees of \$64.00, or a
27 difference of \$31.00.

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1 c. The Commissioner previously cited the company for overcharging borrowers'
2 recording fees after GotMortgage.com's prior regulatory examination in May of 2011.

3 8. Undisclosed Origination Fees

4 GotMortgage.com charged borrowers a "Lender Credit Overfund Refund" fee that was
5 payable to the company in connection with at least 11 mortgage loan files the Commissioner
6 reviewed. The fee was not disclosed in the initial or revised Good Faith Estimates ("GFE") provided
7 to borrowers under "Charges that Cannot Increase." The Commissioner requested GotMortgage.com
8 provide the Department with documentation to substantiate the fee, but the company failed to provide
9 the requested documents. In communications with the Department, GotMortgage.com most recently
10 stated, on or about April 22, 2016, "the 'Lender Credit Overfund Refund' fee that was included in
11 section 1300 of the HUD1 on some files was an erroneous error on the part of the closing agent.
12 Instead of treating the over estimation of costs as a principal curtailment the escrow agent treated it as
13 a lender credit." The company did not provide written evidence to support its assertion and a
14 principal curtailment would typically provide a benefit to the borrower not the lender as
15 GotMortgage.com claimed.

16 In the absence of written support to the contrary, the Commissioner concluded that the
17 "Lender Credit Overfund Refund" was an origination charge because GotMortgage.com received the
18 fees and therefore the charges should have been disclosed in the GFE under the section, "Charges
19 That Cannot Increase," as required by Financial Code section 22346 and Title 12 Code of Federal
20 Regulations section 1024.7 of the Real Estate Settlement Procedures Act ("RESPA").

21 a. For example, in loan file number 230213142, the borrower paid a "Lender Credit
22 Overfund Refund" to GotMortgage.com in the amount of \$225.90, as reflected at line 1302 of the
23 borrower's final HUD-1. The charge was not disclosed to the borrower in the GFE and this fee
24 should have been included in the GFE and final HUD-1 under the section "Charges that Cannot
25 Increase."

26 b. In another example, loan file number 23122177, the borrower paid GotMortgage.com a
27 "Lender Credit Overfund Refund" in the amount of \$393.00 as reflected at line 1302 of the
28 borrower's final HUD-1. The charge was not disclosed to the borrower in the GFE and this fee

1 should have been included in the GFE and final HUD-1 under the section “Charges that Cannot
2 Increase.”

3 9. GotMortgage.com Made Untrue Statements to the Commissioner

4 As a result of the Department’s examination, on or about April 21, 2014, the Commissioner,
5 in the Report of Regulatory Examination, demanded GotMortgage.com make a global review of all
6 loan files it had opened since June 30, 2011, and make borrower refunds for any recording fee
7 overcharges and “Charges that Cannot Increase” (the “Lender Credit Overfund Refund” origination
8 fee overcharges) it found. The company, through its president, Andrea Park (“Park”), responded on
9 or about July 14, 2014, and again on or about September 30, 2014, that GotMortgage.com had made
10 approximately 28 borrower refunds in 22 loan files for both the recording fee and origination
11 overcharges identified by the Commissioner during the examination. GotMortgage.com provided
12 spreadsheets listing the borrowers’ names, loan file numbers, refund amounts, refund dates, and the
13 refund check numbers. In its reports, the company asserted that it had issued the borrowers’ refund
14 checks on May 9, 2014 and October 2, 2014.

15 But in subsequent communications with the Department on February 5 and April 22, 2016, it
16 was apparent that the company had not issued the refund checks in May and October of 2014 as
17 GotMortgage.com originally claimed. In the company’s February 5 follow-up response,
18 GotMortgage.com reported it had issued refund checks on June 29, 2015 and January 28, 2016. This
19 second set of refund checks was issued to the same borrowers, concerned the same loan files, and was
20 issued for the same dollar amounts as those refunds the company previously reported having made in
21 May and October 2014.

22 Concerned that GotMortgage.com had misrepresented information about the borrower
23 refunds, the Department sent a follow-up demand to the company on or about April 13, 2016. The
24 Commissioner provided the company with a chart listing the two sets of refunds side by side and
25 requested clarification as to why two sets of identical refunds were issued to the same borrowers on
26 different dates.

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1 Park responded on or about April 22 that the borrowers' May and October 2014 refund
2 "checks were either never cut or were never sent." GotMortgage.com through its president, Park,
3 made untrue statements to the Commissioner in violation of Financial Code section
4 22170, subdivision (b).

5 a. For example, in July of 2014, GotMortgage.com reported to the Commissioner that it
6 had made two sets of refunds in loan file number 230213142. The company claimed it had issued the
7 borrower a refund check, check number 4882, in the amount of \$93.00, on May 9, 2014 for recording
8 fee overcharges. GotMortgage.com also claimed that on May 9 it had issued the same borrower a
9 refund check, check number 4892, in the amount of \$225.00, for origination charges not disclosed to
10 the borrower until after the loan had closed (identified as a "Lender Credit Overfund Refund" on the
11 borrower's final HUD-1). But in its February 5, 2016 report, the company disclosed that the same
12 borrower received both the recording fee overcharge and origination fee refund checks on June 29,
13 2015, over one year after the company had originally claimed it had made the borrower refunds.

14 b. In another example, in July of 2014, GotMortgage.com reported to the Commissioner
15 that it had made two sets of refunds in loan file number 23122177. The company claimed it had
16 issued the borrower a refund check, check number 4878, in the amount of \$31.00, on May 9, 2014 for
17 recording fee overcharges. GotMortgage.com also claimed that on May 9 it had issued the same
18 borrower a refund check, check number 4888, in the amount of \$393.00, for origination charges not
19 disclosed to the borrower until after the loan had closed (identified as a "Lender Credit Overfund
20 Refund" on the borrower's final HUD-1). But in its February 5, 2016 report, the company disclosed
21 that the same borrower received both the recording fee overcharge and origination refund checks on
22 June 29, 2015, over one year after the company had originally claimed it made the borrower refunds.

23 10. Global Reviews of Loans

24 At the conclusion of the October 2013 examination, the Commissioner sent the company a
25 Report of Regulatory Examination, which detailed the Commissioner's findings and exception items
26 noted during the exam. GotMortgage.com was ordered to refund borrower recording fee overcharges
27 and origination fee charges and "review and correct all account that might have similar overcharges."
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1 The review was to cover the period since June 30, 2011. The Commissioner instructed the company
2 to complete its review and provide borrower refunds within 30 days.

3 While the company reported it had made borrower refunds in the 22 loan files cited by the
4 Department during the exam, GotMortgage.com failed to complete the global review of all loan files
5 it had opened since June 30, 2011. The Commissioner issued a follow-up demand to the company on
6 or about September 15, 2014, instructing GotMortgage.com to refund borrowers' recording fee
7 overcharges and origination fee charges and to "review and correct all accounts that might have
8 similar overcharges" for the period June 30, 2011 to present.

9 On or about September 30, 2014, GotMortgage.com responded to the Commissioner's
10 September 15 follow-up demand, reporting that it had conducted the review and made borrower
11 refunds. It identified six additional recording fee overcharges and no additional origination fee
12 overcharges. But based on the company's response and the limited number of borrower overcharges
13 it had identified, the Commissioner concluded that GotMortgage.com had not adequately completed
14 its review because the results of the company's global audit failed to correspond to the high
15 overcharge rates identified by the Commissioner during the examination. The matter was then
16 referred to the Department's Enforcement Division for further disciplinary action. The Commissioner
17 initiated the present proceedings on or about May 12, 2015.

18 Subsequent to the examination, and after issuing an accusation against GotMortgage.com, the
19 Commissioner made another demand on the company to complete the global review. On or about
20 February 5, 2016, the company provided the Commissioner with an update as to the progress of its
21 global audit, which included a "refund summary report." As of February 5, 2016, according to
22 GotMortgage.com's refund summary report, it had reviewed approximately 486 (or 52%) of 939 loan
23 files opened since June 30, 2011. The company reported having made 414 refunds to borrowers for
24 recording and origination fee overcharges.

25 On or about April 22, 2016, GotMortgage.com provided the Commissioner with another
26 update as to the status of its global review, which included a revised refund summary report. It
27 reported having reviewed 98.5% of the loan files or 923 out of 937 CFLL files opened since June 30,
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1 2011. GotMortgage.com also reported having made 840 borrower refunds totaling \$35,647.92. Of
2 those 840 refunds, 310 of the checks appeared to have been cashed by the borrowers.

3 But a review of the company's latest refund summary report disclosed that
4 GotMortgage.com's review was incomplete and did not cover the required scope of review as
5 directed by the Commissioner. The Department had instructed the company, in its April 21, 2014
6 Report of Regulatory Examination, to review and correct all accounts that might have recording fee
7 and origination overcharges for the period June 30, 2011 to present. But the company's refund
8 summary report provided to the Commissioner on or about April 22, 2016, only showed the loans it
9 originated between April 11, 2012 and July 16, 2015.

10 In addition to not following the proper scope of the global review, GotMortgage.com failed to
11 provide supporting documentation to explain its "Lender Credit Overfund Refund Fee." The
12 company stated in its April 22, 2016 response letter:

13 [T]he 'Lender Credit Overfund Refund' that was included in section
14 1300 of the HUD1 on some files was an erroneous error on the part of
15 the closing agent. Instead of treating the over estimation of costs as a
16 principal curtailment the escrow agent treated it as a lender credit. This
17 occurred on a small number of files and was an anomaly that impacted
18 only a relatively few number of loans in 2012 and 2013. That escrow
19 agent has not been used for many years and will
20 not be used in the future.

21 But GotMortgage.com offered no written documentation to support its explanation and without any
22 written support the Commissioner was unable to verify GotMortgage.com's claims about the fee.
23 Moreover, during the 2013 examination, through random sampling, the "Lender Credit Overfund
24 Refund" fee was found in at least 60% of GotMortgage.com's loan files reviewed. The company's
25 failure to comply with the Commissioner's written demands concerning the global review violated
26 Financial Code section 22714, subdivision (a)(1).

27 In addition to failing to follow the proper scope of review and provide the Department with
28 supporting documentation about the origination fee, GotMortgage.com's global review also disclosed
recordkeeping deficiencies. In several of the loan files identified as part of GotMortgage.com's global
audit, the HUD-1s the company provided with its February 5, 2016 refund summary report differed

1 from the HUD-1s the company provided to the Commissioner's examiner during the examination. In
2 order to determine the correct HUD-1, the Department requested and obtained copies of borrowers'
3 HUD-1s from the settlement agents used in the loan transactions. It appeared that the HUD-1s
4 GotMortgage.com provided on February 5, for the following loans, were only estimate HUD-1s with
5 estimated amounts. The company had poor recordkeeping or procedures, which made it difficult to
6 determine if GotMortgage.com had complied with the CFL, in violation of Financial Code section
7 22156.

8 a. For example, in loan file number 23121117, the HUD-1 provided during the
9 examination disclosed a disbursement date of December 31, 2012. But the HUD-1 GotMortgage.com
10 provided the Commissioner on February 5, 2016, as part of its global review, disclosed a
11 disbursement date of January 2, 2013. Finally, the HUD-1 provided by the settlement agent disclosed
12 a disbursement date of January 2, 2013.

13 b. In another example, loan file number 23010287, the HUD-1 GotMortgage.com
14 provided during the examination disclosed a disbursement date of January 16, 2013. But the HUD-1
15 the company provided the Commissioner on February 5, as part of its global review, disclosed a
16 disbursement date of January 8, 2013. Finally, the HUD-1 provided by the settlement agent disclosed
17 a disbursement date of January 16, 2013.

18 c. In another example, loan file number 23121753, GotMortgage.com's HUD-1 provided
19 during the examination disclosed a disbursement date of January 17, 2013. But the HUD- 1 the
20 company provided the Commissioner on February 5, a part of its global review, disclosed a
21 disbursement date of January 11, 2013. Finally, the HUD-1 provided by the settlement agent
22 disclosed a disbursement date of January 17, 2013.

23 d. In another example, loan file number 23010796, the HUD-1 the company provided
24 during the examination disclosed a disbursement date of January 31, 2013. The HUD-1 the company
25 provided on February 5, a part of its global review, also disclosed a disbursement date of January 31,
26 2013. But the HUD-1 provided by the settlement agent showed a disbursement date of February 5,
27 2013.

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1 It was unclear how the company was determining the date of disbursement on some loans for
2 purposes of the global review, if the settlement statement the company reviewed was not the
3 borrower's final HUD-1. Moreover, it was not clear what documents GotMortgage.com reviewed to
4 determine final settlement amounts charged or credited to the borrowers. The company did not appear
5 to have post-closing procedures in place that would compare the final HUD-1 amounts with the
6 correct supporting documentation, refund any overcharges to the borrower in a timely manner, and
7 maintain proper records for review during regulatory examinations.

8 11. Per Diem Interest Violations

9 In its refund summary report, GotMortgage.com also included the results of its global review
10 of per diem interest overcharges. During the 2013 examination the Commissioner identified at least
11 two loan files in which borrowers were overcharged per diem interest, but the Department did not
12 require the company to conduct a global review to identify additional per diem interest violations in
13 loan files opened since June 30, 2011. Nevertheless, as part of its global review, the company
14 reported that it had reviewed all of its loan files for per diem interest overcharges.

15 But based on the Commissioner's review of GotMortgage.com's refund summary report, it
16 did not appear that GotMortgage.com had implemented procedures to provide borrowers with
17 completed per diem interest disclosures and to correctly identify per diem interest overcharges and
18 make overcharge refunds to borrowers on affected accounts.

19 For example, in at least two loan files, the company had overcharged borrowers' per diem
20 interest in excess of one day prior to disbursement of loan proceeds in violation of section 2948.5 of
21 the Civil Code and title 10 California Code of Regulations section 1457. Civil Code section 2948.5
22 prohibits a lender from charging interest more than one day from the date the loan proceeds are
23 disbursed from escrow unless the borrower voluntarily elects to have the proceeds disbursed on a
24 Monday or a day immediately following a bank holiday, and the lender discloses the amount of
25 additional per diem interest the borrower will pay as a result of the election.

26 a. In loan file number 23010796, the company overcharged the borrower at least four
27 days of interest, with a per diem interest overcharge of at least \$106.56.

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1 paragraphs (1) and (2) of subdivision (a) if both of the following occur:

2 (1) The borrower affirmatively requests, and the lender agrees, that the
3 disbursement will occur on Monday, or a day immediately following a
4 bank holiday.

5 (2) The following information is disclosed to the borrower in writing:
6 (A) the amount of additional per diem interest charged to facilitate
7 disbursement on Monday or the day following a holiday, as the case
8 may be, and (B) that it may be possible to avoid the additional per diem
9 interest charge by disbursing the loan proceeds on a day immediately
10 following a business day. This disclosure shall be provided to the
11 borrower and acknowledged by the borrower by signing a copy of the
12 disclosure document prior to placing funds in escrow.

13 (c) This section does not apply to a loan that is subject to subdivision
14 (c) of Section 10242 of the Business and Professions Code.

15 13. Financial Code section 22156 provides:

16 Finance lender, broker, and mortgage loan originator licensees shall
17 keep and use in their business, books, accounts, and records which will
18 enable the commissioner to determine if the licensee is complying with
19 the provisions of this division and with the rules and regulations made
20 by the commissioner. On any loan secured by real property in which
21 loan proceeds were disbursed to an independent escrowholder, the
22 licensee shall retain records and documents as set forth by rules of the
23 commissioner adopted pursuant to Section 22150. Upon request of the
24 commissioner, licensees shall file an authorization for disclosure to the
25 commissioner of financial records of the licensed business pursuant to
26 Section 7473 of the Government Code.

27 14. Financial Code section 22170, subdivision (b), provides:

28 (b) It is unlawful for any person to knowingly make an untrue
statement to the commissioner or the Nationwide Mortgage Licensing
System and Registry during the course of licensing, investigation, or
examination, with the intent to impede, obstruct, or influence the
administration or enforcement of any provision of this division.

15. Financial Code section 22336 provides in relevant part:

This article does not prohibit any licensee from contracting for,
collecting, or receiving the following:

(a) The statutory fee paid by the licensee to any public officer for

1 acknowledging, filing, recording, or releasing in any public office any
2 instrument securing the loan or executed in connection with the loan.

3 (b) Premiums paid by the licensee of the kind and to the extent
4 described in paragraph (2) of subsection (e) of Section 226.4 of
5 Regulation Z promulgated by the Board of Governors of the Federal
6 Reserve System (12 C.F.R. 226).
7 These amounts are not included in determining the maximum charges
8 which may be made under this article. . . .

7 16. Financial Code section 22346, subdivision (a), provides:

8 Any licensee that violates any provision of any of the following federal
9 acts or regulations violates this division:

10 (a) The federal Real Estate Settlement Procedures Act, as amended (12
11 U.S.C. Sec. 2601 et seq.).

12 17. Financial Code section 22714 provides in pertinent part:

13 (a) The commissioner shall suspend or revoke any license, upon notice
14 and reasonable opportunity to be heard, if the commissioner finds any
15 of the following:

16 (1) The licensee has failed to comply with any demand, ruling, or
17 requirement of the commissioner made pursuant to and within the
18 authority of this division.

19 (2) The licensee has violated any provision of this division or any rule
20 or regulation made by the commissioner under and within the authority
21 of this division.

22 (3) A fact or condition exists that, if it had existed at the time of the
23 original application for the license, reasonably would have warranted
24 the commissioner in refusing to issue the license originally. . . .

25 18. Title 12 Code of Federal Regulations section 1024.7 provides in relevant part:

26 (a) Lender to provide. (1) Except as otherwise provided in paragraphs
27 (a), (b), or (h) of this section, not later than 3 business days after a
28 lender receives an application, or information sufficient to complete an
application, the lender must provide the applicant with a GFE. In the
case of dealer loans, the lender must either provide the GFE or ensure
that the dealer provides the GFE.

(2) The lender must provide the GFE to the loan applicant by hand

1 delivery, by placing it in the mail, or, if the applicant agrees, by fax,
2 email, or other electronic means.

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4 (e) Tolerances for amounts included on GFE. (1) Except as provided in
5 paragraph (f) of this section, the actual charges at settlement may not
6 exceed the amounts included on the GFE for:

7 (i) The origination charge;

8 (ii) While the borrower's interest rate is locked, the credit or charge for
9 the interest rate chosen;

10 (iii) While the borrower's interest rate is locked, the adjusted
11 origination charge; and

12 (iv) Transfer taxes.

13 (2) Except as provided in paragraph (f) of this section, the sum of the
14 charges at settlement for the following services may not be greater than
15 10 percent above the sum of the amounts included on the GFE:

16 (i) Lender-required settlement services, where the lender selects the
17 third party settlement service provider;

18 (ii) Lender-required services, title services and required title insurance,
19 and owner's title insurance, when the borrower uses a settlement
20 service provider identified by the loan originator; and

21 (iii) Government recording charges.

22 (3) The amounts charged for all other settlement services included on
23 the GFE may change at settlement.

24 19. Title 10 California Code of Regulations section 1457 provides:

25 (a) Except as provided in subsections (b), (c) and (d) of this section, a
26 finance company may collect and receive charges only on the portion
27 of the unpaid principal balance actually disbursed to the borrower or on
28 the borrower's behalf, and only from the date of such disbursement.

(b) Charges on the amount of any statutory fees to be paid to a public
officer may be collected and received from the date of the loan,
provided the fees are actually paid within a reasonable time after the
loan is made.

(c) Charges on the amount of premium for insurance written in

1 connection with a loan may be collected and received only from the
2 effective date of the insurance. However, if the loan is refinanced and
3 insurance extended to cover the refinanced loan to the new maturity
4 date, charges upon the premium may be collected and received from
5 the date of such refinance.

6 (d) Charges on a loan secured by real property may be collected and
7 received only from the date of closing of the escrow, when the loan
8 proceeds are disbursed by the escrow holder, except as provided by
9 Civil Code Section 2948.5.

10 **IV**

11 **Prayer**

12 The Commissioner finds that, by reason of the foregoing, GotMortgage.com violated: (1)
13 subdivision (a) of section 22336 of the Financial Code by charging borrowers statutory recording fees
14 in excess of the amounts charged by a public officer; (2) Financial Code section 22346 and Title 12
15 Code of Federal Regulations section 1024.7 by charging borrowers origination fees, which it failed to
16 disclose in the borrowers' GFEs; (3) made untrue statements to the Commissioner with the intent to
17 impede, obstruct, or influence the administration or enforcement of any provision of this division in
18 violation of Financial Code section 22170, subdivision (b); (4) in connection with the global review,
19 violated sections 22156 and 22714, subdivision (a)(1) of the Financial Code by failing to comply
20 with the demands of the Commissioner, which included failing to follow the proper scope of the
21 global audit, provide the Commissioner with supporting documentation to explain certain borrower
22 overcharges, and provide the Commissioner with accurate books and records; and (5) Civil Code
23 section 2948.5 and title 10 California Code of Regulations section 1457 by failing to provide the
24 borrowers with completed per diem interest disclosures and overcharging borrowers' per diem
25 interest. Based upon these findings, sufficient grounds exist to revoke or, in the alternative, suspend
26 the license of GotMortgage.com.

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WHEREFORE, IT IS PRAYED that the CFLL license of Respondent GotMortgage.com, doing business as Performance Capital Group, be revoked or, in the alternative, suspended for a period of up to 12 months.

Dated: May 26, 2016
Los Angeles, CA

JAN LYNN OWEN
Commissioner of Business Oversight

By _____
BLAINE A. NOBLETT
Senior Counsel
Enforcement Division