

1	In re the Matter of:) Case No.: 11-170
)
2	State of New Hampshire Banking Department,)
)
3	Petitioner,)
)
4	and)
)
5	Network Capital Funding Corporation, Tri Minh)
)
6	Nguyen, Daniel Thomas Hanley, Josh Johnson)
)
7	(a/k/a Joshua David Johnson), Gregory Allen) Order to Show Cause and
) Cease and Desist
8	Krol, Kauai Choichiro Kakuuchi, Kristen Rebecca)
)
9	Steiner, Michael Milakovich, Federico Cepeda)
)
10	III, Timothy Lester Kyle, Aaron Powell, Chris)
)
11	Kungl, Christopher Richard Martin (a/k/a Chris)
)
12	Martin), Kourosh Kavooosi (a/k/a Christopher)
)
13	Kavooosi), David De Courcy, George Dalou, Ghanim)
)
14	Hisham Sabeh, Jayden La, Joel Mallo, Jordan)
)
15	Kendall Biel, Julio Benenati, Kenneth Marc)
)
16	Moss, Michael Seunghyung Chough, Michael Foster)
)
17	Colapinto, Rataeb Sunbol (a/k/a Mike Sunbol),)
)
18	Nelson Thuong Nguyen, Paul Mory, Richard Joseph)
)
19	Hartnett, Jr. (a/k/a R.J. Hartnett), Robbie)
)
20	Steven Rodriguez, Stephen Curameng, Steve)
)
21	Taylor, and Thomas Lee, Hector A. Estrada, Sam)
)
22	Rumi, Nancy Nazanin Bayat, John Molavi, Frank)
)
23	Joseph Parrino, and Rhyan Ordonia Mercado,)
)
24	Respondents)
)
25		

1 states. Respondent Nguyen is a Direct Owner (RSA 397-A:1,VI-a), a Principal
2 (RSA 397-A:1,XIX), a Person (RSA 397-A:1,XVIII), a Control Person (RSA 397-
3 A:1,V-a) and a Mortgage Loan Originator (RSA 397-A:1,XVII).

4 7. Daniel Thomas Hanley ("Respondent Hanley") is an unlicensed New
5 Hampshire Mortgage Loan Originator who worked for or currently works for
6 Respondent Network Capital. NMLS records indicate Respondent Hanley was
7 issued an NMLS unique identifier but currently holds no mortgage loan
8 originator licenses. Respondent Hanley is a Person (RSA 397-A:1,XVIII) and
9 Mortgage Loan Originator (RSA 397-A:1,XVII).

10 8. Josh Johnson (a/k/a Joshua David Johnson) ("Respondent Johnson") is an
11 unlicensed New Hampshire Mortgage Loan Originator who currently works for
12 Respondent Network Capital. NMLS records indicate Respondent Johnson is
13 listed as "Joshua David Johnson" and currently holds a mortgage loan
14 originator license in California, District of Columbia, Virginia and
15 Washington. Respondent Johnson is a Person (RSA 397-A:1,XVIII) and Mortgage
16 Loan Originator (RSA 397-A:1,XVII).

17 9. Gregory Allen Krol ("Respondent Krol") is an unlicensed New Hampshire
18 Mortgage Loan Originator who worked for Respondent Network Capital from
19 September 2009 to July 2011. NMLS records indicate Respondent Krol currently
20 holds a mortgage loan originator license in California, District of
21 Columbia, Massachusetts and Washington. Respondent Krol is a Person (RSA
22 397-A:1,XVIII) and Mortgage Loan Originator (RSA 397-A:1,XVII).

23 10. Kauai Choichiro Kakuuchi ("Respondent Kakuuchi") is an unlicensed New
24 Hampshire Mortgage Loan Originator who worked or currently works for
25 Respondent Network Capital. NMLS records indicate Respondent Kakuuchi does

1 not currently hold a mortgage loan originator license. Respondent Kakuuchi
2 is a Person (RSA 397-A:1,XVIII) and Mortgage Loan Originator (RSA 397-
3 A:1,XVII).

4 11. Kristen Rebecca Steiner ("Respondent Steiner") is an unlicensed New
5 Hampshire Mortgage Loan Originator who worked for Respondent Network Capital
6 from April 2010 to December 2010. NMLS records indicate Respondent Steiner
7 currently holds a mortgage loan originator license in California.
8 Respondent Steiner is a Person (RSA 397-A:1,XVIII) and Mortgage Loan
9 Originator (RSA 397-A:1,XVII).

10 12. Michael Milakovich ("Respondent Milakovich") is an unlicensed New
11 Hampshire Mortgage Loan Originator who worked or currently works for
12 Respondent Network Capital. NMLS records indicate Respondent Milakovich does
13 not currently hold a mortgage loan originator license. Respondent
14 Milakovich is a Person (RSA 397-A:1,XVIII) and Mortgage Loan Originator (RSA
15 397-A:1,XVII).

16 13. Federico Cepeda III ("Respondent Cepeda") is an unlicensed New
17 Hampshire Mortgage Loan Originator who currently works for Respondent
18 Network Capital. NMLS records indicate Respondent Cepeda currently holds a
19 mortgage loan originator license in seven other states, a denied mortgage
20 loan originator license in North Carolina and an approved-inactive mortgage
21 loan originator license in Arizona. Respondent Cepeda is a Person (RSA 397-
22 A:1,XVIII) and Mortgage Loan Originator (RSA 397-A:1,XVII).

23 14. Timothy Lester Kyle ("Respondent Kyle") is an unlicensed New Hampshire
24 Mortgage Loan Originator who currently works for Respondent Network Capital.
25 NMLS records indicate Respondent Kyle currently holds a mortgage loan

1 originator license in California, District of Columbia, Oregon, Virginia and
2 Washington. Respondent Kyle voluntarily withdrew his mortgage loan
3 originator license from Georgia and Massachusetts and the application was
4 abandoned in Maryland. Respondent Kyle is a Person (RSA 397-A:1,XVIII) and
5 Mortgage Loan Originator (RSA 397-A:1,XVII).

6 15. Aaron Powell ("Respondent Powell") is an unlicensed New Hampshire
7 Mortgage Loan Originator who worked or currently works for Respondent
8 Network Capital. NMLS records indicate Respondent Powell does not currently
9 hold a mortgage loan originator license. Respondent Powell is a Person (RSA
10 397-A:1,XVIII) and Mortgage Loan Originator (RSA 397-A:1,XVII).

11 16. Chris Kungl ("Respondent Kungl") is an unlicensed New Hampshire
12 Mortgage Loan Originator who worked or currently works for Respondent
13 Network Capital. NMLS records indicate Respondent Kungl does not currently
14 hold a mortgage loan originator license. Respondent Kungl is a Person (RSA
15 397-A:1,XVIII) and Mortgage Loan Originator (RSA 397-A:1,XVII).

16 17. Christopher Richard Martin (a/k/a Chris Martin) ("Respondent Martin")
17 is an unlicensed New Hampshire Mortgage Loan Originator who currently works
18 for Respondent Network Capital. NMLS records indicate Respondent Martin
19 currently holds a mortgage loan originator license in Washington with
20 pending incomplete status in California, District of Columbia, Maryland,
21 Massachusetts and New Jersey and pending deficient in North Carolina.
22 Respondent Martin is a Person (RSA 397-A:1,XVIII) and Mortgage Loan
23 Originator (RSA 397-A:1,XVII).

24 18. Kourosh Kavooosi (a/k/a Christopher Kavooosi) ("Respondent Kavooosi") is
25 an unlicensed New Hampshire Mortgage Loan Originator who worked for

1 Respondent Network Capital from April 2010 to December 2010. NMLS records
2 indicate Respondent Kavooosi currently holds a mortgage loan originator
3 license in California. Respondent Kavooosi is a Person (RSA 397-A:1,XVIII)
4 and Mortgage Loan Originator (RSA 397-A:1,XVII).

5 19. David De Courcy ("Respondent Courcy") is an unlicensed New Hampshire
6 Mortgage Loan Originator who currently works for Respondent Network Capital.
7 NMLS records indicate Respondent De Courcy currently holds a mortgage loan
8 originator license in California. Respondent De Courcy is a Person (RSA
9 397-A:1,XVIII) and Mortgage Loan Originator (RSA 397-A:1,XVII).

10 20. George Dalou ("Respondent Dalou") is an unlicensed New Hampshire
11 Mortgage Loan Originator who worked or currently works for Respondent
12 Network Capital. NMLS records indicate Respondent Dalou does not currently
13 hold a mortgage loan originator license. Respondent Dalou is a Person (RSA
14 397-A:1,XVIII) and Mortgage Loan Originator (RSA 397-A:1,XVII).

15 21. Ghanim Hisham Sabeh ("Respondent Sabeh") is an unlicensed New
16 Hampshire Mortgage Loan Originator who currently works for Respondent
17 Network Capital. NMLS records indicate Respondent Sabeh's mortgage loan
18 originator license in California, District of Columbia, Maryland and
19 Washington is currently listed as approved-inactive. Respondent Sabeh is a
20 Person (RSA 397-A:1,XVIII) and Mortgage Loan Originator (RSA 397-A:1,XVII).

21 22. Jayden La ("Respondent La") is an unlicensed New Hampshire Mortgage
22 Loan Originator who worked or currently works for Respondent Network
23 Capital. NMLS records indicate Respondent La does not currently hold a
24 mortgage loan originator license. Respondent La is a Person (RSA 397-
25 A:1,XVIII) and Mortgage Loan Originator (RSA 397-A:1,XVII).

1 23. Joel Mallo ("Respondent Mallo") is an unlicensed New Hampshire
2 Mortgage Loan Originator who worked for Respondent Network Capital from June
3 2010 to July 2011. NMLS records indicate Respondent Mallo's mortgage loan
4 originator license in California, Illinois and Washington is currently
5 listed as approved-inactive. Respondent Mallo is a Person (RSA 397-
6 A:1,XVIII) and Mortgage Loan Originator (RSA 397-A:1,XVII).

7 24. Jordan Kendall Biel ("Respondent Biel") is an unlicensed New Hampshire
8 Mortgage Loan Originator who currently works for Respondent Network Capital.
9 NMLS records indicate Respondent Biel is licensed as a mortgage loan
10 originator in California and Washington. Respondent Biel is a Person (RSA
11 397-A:1,XVIII) and Mortgage Loan Originator (RSA 397-A:1,XVII).

12 25. Julio Benenati ("Respondent Benenati") is an unlicensed New Hampshire
13 Mortgage Loan Originator who worked for Respondent Network Capital from
14 August 2010 to December 2010. NMLS records indicate Respondent Benenati is
15 licensed as a mortgage loan originator in California, Illinois and
16 Washington. Respondent Benenati is a Person (RSA 397-A:1,XVIII) and Mortgage
17 Loan Originator (RSA 397-A:1,XVII).

18 26. Kenneth Marc Moss ("Respondent Moss") is an unlicensed New Hampshire
19 Mortgage Loan Originator who currently works for Respondent Network Capital.
20 NMLS records indicate Respondent Moss voluntarily surrendered his mortgage
21 loan originator license in the District of Columbia and was denied a
22 mortgage loan originator license in Washington. Respondent Moss is a Person
23 (RSA 397-A:1,XVIII) and Mortgage Loan Originator (RSA 397-A:1,XVII).

24 27. Michael Seunghyung Chough ("Respondent Chough") is an unlicensed New
25 Hampshire Mortgage Loan Originator who worked for Respondent Network Capital

1 from November 2010 to May 2011. NMLS records indicate Respondent Chough has
2 an approved-inactive mortgage loan originator license and an approved-
3 inactive real estate salesperson license with the California. Respondent
4 Chough is a Person (RSA 397-A:1,XVIII) and Mortgage Loan Originator (RSA
5 397-A:1,XVII).

6 28. Michael Foster Colapinto ("Respondent Colapinto") is an unlicensed New
7 Hampshire Mortgage Loan Originator who currently works for Respondent
8 Network Capital. NMLS records indicate Respondent Colapinto is a licensed
9 mortgage loan originator in California, District of Columbia, Maryland, New
10 Jersey, Pennsylvania and Washington and voluntarily surrendered his
11 Connecticut mortgage loan originator license. Respondent Colapinto is a
12 Person (RSA 397-A:1,XVIII) and Mortgage Loan Originator (RSA 397-A:1,XVII).

13 29. Rataeb Sunbol (a/k/a Mike Sunbol) ("Respondent Sunbol") is an
14 unlicensed New Hampshire Mortgage Loan Originator who currently works for
15 Respondent Network Capital. NMLS records indicate Respondent Sunbol is a
16 licensed mortgage loan originator in Washington. Respondent Sunbol is a
17 Person (RSA 397-A:1,XVIII) and Mortgage Loan Originator (RSA 397-A:1,XVII).

18 30. Nelson Thuong Nguyen ("Respondent Nelson Nguyen") is an unlicensed New
19 Hampshire Mortgage Loan Originator who currently works for Respondent
20 Network Capital. NMLS records indicate Respondent Nelson Nguyen's mortgage
21 loan originator license in California is approved-inactive. Respondent
22 Nelson Nguyen is a Person (RSA 397-A:1,XVIII) and Mortgage Loan Originator
23 (RSA 397-A:1,XVII).

24 31. Paul Mory ("Respondent Mory") is an unlicensed New Hampshire Mortgage
25 Loan Originator who worked or currently works for Respondent Network

1 Capital. NMLS records indicate Respondent Mory does not currently hold a
2 mortgage loan originator license. Respondent Mory is a Person (RSA 397-
3 A:1,XVIII) and Mortgage Loan Originator (RSA 397-A:1,XVII).

4 32. Richard Joseph Hartnett, Jr. (a/k/a R.J. Hartnett) ("Respondent
5 Harnett") is an unlicensed New Hampshire Mortgage Loan Originator who
6 currently works for Respondent Network Capital. NMLS records indicate
7 Respondent Hartnett is a licensed mortgage loan originator in California,
8 has expired mortgage loan originator licenses in the District of Columbia
9 and Oklahoma and is approved-inactive in Illinois, Louisiana, Maryland, New
10 Jersey and Washington. Respondent Hartnett is a Person (RSA 397-A:1,XVIII)
11 and Mortgage Loan Originator (RSA 397-A:1,XVII).

12 33. Robbie Steven Rodriguez ("Respondent Rodriguez") is an unlicensed New
13 Hampshire Mortgage Loan Originator who currently works for Respondent
14 Network Capital. NMLS records indicate Respondent Rodriguez is a licensed
15 mortgage loan originator in California, the District of Columbia and
16 Washington. Respondent Rodriguez has expired mortgage loan originator
17 licenses in Kansas and Texas. Respondent Rodriguez voluntarily surrendered
18 his mortgage loan originator license in Connecticut; however, Respondent
19 Rodriguez was denied mortgage loan originator licenses in North Carolina and
20 West Virginia. Respondent Rodriguez is a Person (RSA 397-A:1,XVIII) and
21 Mortgage Loan Originator (RSA 397-A:1,XVII).

22 34. Stephen Curameng ("Respondent Curameng") is an unlicensed New
23 Hampshire Mortgage Loan Originator who worked for Respondent Network Capital
24 from February 2006 to November 2010. NMLS records indicate Respondent
25 Curameng's mortgage loan originator licenses in California, Connecticut and

1 Washington are approved-inactive. Respondent Curameng has an expired
2 mortgage loan originator license in Illinois. Respondent Curameng's mortgage
3 loan originator license in Pennsylvania is suspended. Respondent Curameng
4 is a Person (RSA 397-A:1,XVIII) and Mortgage Loan Originator (RSA 397-
5 A:1,XVII).

6 35. Steve Taylor ("Respondent Taylor") is an unlicensed New Hampshire
7 Mortgage Loan Originator who worked or currently works for Respondent
8 Network Capital. NMLS records indicate Respondent Taylor does not currently
9 hold a mortgage loan originator license. Respondent Taylor is a Person (RSA
10 397-A:1,XVIII) and Mortgage Loan Originator (RSA 397-A:1,XVII).

11 36. Thomas Lee ("Respondent Lee") is an unlicensed New Hampshire Mortgage
12 Loan Originator who worked or currently works for Respondent Network
13 Capital. NMLS records indicate Respondent Lee does not currently hold a
14 mortgage loan originator license. Respondent Lee is a Person (RSA 397-
15 A:1,XVIII) and Mortgage Loan Originator (RSA 397-A:1,XVII).

16 37. Hector A. Estrada ("Respondent Estrada") is a New Hampshire Mortgage
17 Loan Originator currently sponsored by Respondent Network Capital. NMLS
18 records indicate Respondent Estrada has been a licensed New Hampshire
19 Mortgage Loan Originator since March 15, 2011 and is currently licensed in
20 15 other states. Respondent Estrada is a Person (RSA 397-A:1,XVIII) and
21 Mortgage Loan Originator (RSA 397-A:1,XVII).

22 38. Sam Rumi ("Respondent Rumi") is a New Hampshire Mortgage Loan
23 Originator currently sponsored by Respondent Network Capital. NMLS records
24 indicate Respondent Rumi has been a licensed New Hampshire Mortgage Loan
25 Originator since February 17, 2011 and is currently licensed in 15 other

1 states. Respondent Rumi is a Person (RSA 397-A:1,XVIII) and Mortgage Loan
2 Originator (RSA 397-A:1,XVII).

3 39. Nancy Nazanin Bayat ("Respondent Bayat") is a New Hampshire Mortgage
4 Loan Originator currently sponsored by Respondent Network Capital. NMLS
5 records indicate Respondent Bayat has been a licensed New Hampshire Mortgage
6 Loan Originator since April 6, 2011 and is currently licensed in 12 other
7 states. Respondent Bayat is a Person (RSA 397-A:1,XVIII) and Mortgage Loan
8 Originator (RSA 397-A:1,XVII).

9 40. John Molavi ("Respondent Molavi") is a New Hampshire Mortgage Loan
10 Originator currently sponsored by Respondent Network Capital. NMLS records
11 indicate Respondent Molavi has been a licensed New Hampshire Mortgage Loan
12 Originator since May 10, 2011 and is currently licensed in 10 other states.
13 Respondent Molavi is a Person (RSA 397-A:1,XVIII) and Mortgage Loan
14 Originator (RSA 397-A:1,XVII).

15 41. Frank Joseph Parrino ("Respondent Parrino") is an unlicensed New
16 Hampshire Mortgage Loan Originator who currently works for Respondent
17 Network Capital. NMLS records indicate Respondent Parrino currently holds a
18 mortgage loan originator license in California, District of Columbia and
19 Washington. Respondent Parrino is a Person (RSA 397-A:1,XVIII) and Mortgage
20 Loan Originator (RSA 397-A:1,XVII).

21 42. Rhyan Ordonia Mercado ("Respondent Mercado") is an unlicensed New
22 Hampshire Mortgage Loan Originator who worked or currently works for
23 Respondent Network Capital. NMLS records indicate Respondent Mercado does
24 not currently hold a mortgage loan originator license. Respondent Mercado
25 is a Person (RSA 397-A:1,XVIII) and Mortgage Loan Originator (RSA 397-

1 A:1,XVII).

2 43. The above named Respondents are hereby collectively known as
3 "Respondents".

4 **RIGHT TO REQUEST A HEARING**

5 44. Respondents have a right to request a hearing on this Order. A hearing
6 shall be scheduled not later than ten (10) days after the Commissioner
7 receives the Respondent's written request for a hearing. Respondents may
8 request a hearing and waive the ten (10) day hearing requirement. The
9 hearing shall comply with RSA Chapter 541-A, RSA 397-A:17,I, and II, and RSA
10 397-A:18,I and II.

11 45. If any person fails to request a hearing within thirty (30) days of
12 receiving this Order, then such person shall be deemed in default, and the
13 Order shall, on the thirty-first (31st) day, become permanent, all
14 allegations may be deemed true, and shall remain in full force and effect
15 until modified or vacated by the Commissioner for good cause shown. RSA 397-
16 A:17,I and II, and RSA 397-A:18,I and II.

17 46. A default may result in administrative fines as described in
18 Paragraphs 2 and 3 above.

19 **STATEMENT OF ALLEGATIONS**

20 47. On May 9, 2011, the Department began an examination of Respondent
21 Network Capital and discovered several violations, which include licensed
22 mortgage loan originators misrepresenting themselves to New Hampshire
23 consumers and the Department as the originators who worked on New Hampshire
24 residential mortgage loans when unlicensed New Hampshire mortgage loan
25 originators were the individuals who originated those New Hampshire

1 residential mortgage loans. Other violations include failing to give initial
2 disclosures in a timely manner or at all to consumers and making false
3 statements to the Commissioner.

4 **Unlicensed Mortgage Loan Originators: July 2010 to April 2011:**

5 48. Respondent Network Capital's licensed and unlicensed mortgage loan
6 originators are called "Credit Manager" or "Senior Credit Manager". Within
7 the loan documents reviewed by the Department, the mortgage loan originators
8 are titled Credit Managers (CM). The CM is the individual who works on the
9 residential mortgage loan. At a later point in time, a Loan Originator (LO)
10 is added to the residential mortgage loan file. This LO is the individual
11 who is licensed in the NMLS and whose name appears on the loan documents and
12 disclosures in the residential loan files. Throughout all other internal
13 paperwork of Respondent Network Capital, CM and LO appear to be used
14 interchangeably.

15 49. Based on the Department's examination of Respondent Network Capital,
16 Respondent Network Capital funded forty-eight (48) New Hampshire residential
17 mortgage loans from July 2010 to April 2011.

18 50. According to the list provided by Respondents, Respondent Nguyen
19 originated approximately 90% of the New Hampshire residential mortgage loans
20 yet the list is inaccurate.

21 51. Respondents Network Capital and Nguyen state that the residential
22 mortgage loan process is the CM gives the information to the LO to complete
23 and give a quote to the New Hampshire consumers and then the CM completes
24 the loan funding process. The New Hampshire residential loan files found in
25

1 Respondent Network Capital's computer system called Encompass state
2 different set of actions.

3 a. On Encompass' Dashboard, Respondent Network Capital tracks "Loan
4 Officer Production," which shows what is in the pipeline at any given point
5 in time. The date range of February 11, 2011 to May 11, 2011 showed that 153
6 New Hampshire residential mortgage loans were in process with many
7 individuals, whose names correspond with the CM label.

8 b. Of those 153 New Hampshire residential mortgage loans,
9 Respondent Nguyen (identified on the documents as "trin" had only one (1)
10 loan in process. Respondent Hanley (identified on the documents as
11 "danielh"), who again is an unlicensed New Hampshire Mortgage Loan
12 Originator, had 11 residential mortgage loans in process.

13 **Respondent Hanley (Unlicensed Mortgage Loan Originator)**

14 52. The Department discovered Respondent Hanley transacted business in New
15 Hampshire as a mortgage loan originator from on or about March 20, 2011
16 (file started) to April 25, 2011 (loan funded) for Consumer 1 without a New
17 Hampshire Mortgage Loan Originator license, in violation of RSA 397-A:3,II
18 and RSA 397-A:14,IV(d). Respondent Hanley retained a \$1,004.58 commission,
19 which pursuant to RSA 397-A:16,IV should be returned to Consumer 1.

20 a. Encompass: listed Respondent Hanley as CM and Respondent Estrada
21 as LO.

22 b. Respondent Hanley signed a Credit Manager Pay Contract on April
23 19, 2010 indicated he receives a 50% split for loans funded for the month.

24 53. The Department discovered Respondent Hanley transacted business in New
25 Hampshire as a mortgage loan originator on or about December 31, 2010 (loan

1 funded) for Consumer 12 without a New Hampshire Mortgage Loan Originator
2 license, in violation of RSA 397-A:3,II and RSA 397-A:14,IV(d). Respondent
3 Hanley retained a \$2,156.75 commission, which pursuant to RSA 397-A:16,IV
4 should be returned to Consumer 12.

5 a. Encompass: listed Respondent Hanley as CM and Respondent Nguyen
6 as LO.

7 54. The Department discovered Respondent Hanley transacted business in New
8 Hampshire as a mortgage loan originator on or about December 31, 2010 (loan
9 funded) for Consumer 13 without a New Hampshire Mortgage Loan Originator
10 license, in violation of RSA 397-A:3,II and RSA 397-A:14,IV(d). Respondent
11 Hanley retained a \$1,764.53 commission, which pursuant to RSA 397-A:16,IV
12 should be returned to Consumer 13.

13 a. Encompass: listed Respondent Hanley as CM and Respondent Nguyen
14 as LO.

15 **Respondent Johnson (Unlicensed Mortgage Loan Originator)**

16 55. The Department discovered Respondent Johnson transacted business in
17 New Hampshire as a mortgage loan originator from on or about November 8,
18 2010 (file started) to December 6, 2010 (loan funded) for Consumer 2 without
19 a New Hampshire Mortgage Loan Originator license, in violation of RSA 397-
20 A:3,II and RSA 397-A:14,IV(d). Respondent Johnson retained a \$271.95
21 commission, which pursuant to RSA 397-A:16,IV should be returned to Consumer
22 2.

23 a. Encompass: listed Respondent Johnson as CM and Respondent Nguyen
24 as LO.

25 b. Respondent Johnson signed a Loan Officer Pay Contract on

1 February 8, 2010 indicated he receives a commission split for loans funded
2 for the month per the Credit Manager Letter of Intent plus any monthly bonus
3 earned.

4 **Respondent Krol (Unlicensed Mortgage Loan Originator)**

5 56. The Department discovered Respondent Krol transacted business in New
6 Hampshire as a mortgage loan originator from on or about September 16, 2010
7 (file started) to November 16, 2010 (loan funded) for Consumer 3 without a
8 New Hampshire Mortgage Loan Originator license, in violation of RSA 397-
9 A:3,II and RSA 397-A:14,IV(d). Respondent Krol retained a \$2,887.45
10 commission, which pursuant to RSA 397-A:16,IV should be returned to Consumer
11 3.

12 a. Encompass: listed Respondent Krol as CM and Respondent Nguyen as
13 LO.

14 b. Respondent Krol signed a Credit Manager Letter of Intent
15 Agreement on November 29, 2009 indicated he receives a tiered commission
16 split for loans funded for the month, which ranges from 35% to 50%.

17 **Respondent Kakuuchi (Unlicensed Mortgage Loan Originator)**

18 57. The Department discovered Respondent Kakuuchi transacted business in
19 New Hampshire as a mortgage loan originator from on or about November 15,
20 2010 (file started) to January 6, 2011 (loan funded) for Consumer 4 without
21 a New Hampshire Mortgage Loan Originator license, in violation of RSA 397-
22 A:3,II and RSA 397-A:14,IV(d). Respondent Kakuuchi retained a \$827.91
23 commission, which pursuant to RSA 397-A:16,IV should be returned to Consumer
24 4.

25 a. Encompass: listed Respondent Kakuuchi as CM and Respondent

1 Nguyen as LO.

2 b. Respondent Kakuuchi's agreement was not provided for the
3 Department's examination of Respondents but the net commission of 25% on the
4 Commission Sheet matches what Respondent Kakuuchi received on the Consumer 4
5 loan.

6 58. The Department discovered Respondent Kakuuchi transacted business in
7 New Hampshire as a mortgage loan originator on or about January 25, 2011
8 (loan funded) for Consumer 14 without a New Hampshire Mortgage Loan
9 Originator license, in violation of RSA 397-A:3,II and RSA 397-A:14,IV(d).
10 Respondent Kakuuchi retained a \$1,548.06 commission, which pursuant to RSA
11 397-A:16,IV should be returned to Consumer 14.

12 a. Encompass: listed Respondent Kakuuchi as CM and Respondent
13 Nguyen as LO.

14 59. The Department discovered Respondent Kakuuchi transacted business in
15 New Hampshire as a mortgage loan originator on or about February 28, 2011
16 (loan funded) for Consumer 15 without a New Hampshire Mortgage Loan
17 Originator license, in violation of RSA 397-A:3,II and RSA 397-A:14,IV(d).
18 Respondent Kakuuchi retained a \$1,030.26 commission, which pursuant to RSA
19 397-A:16,IV should be returned to Consumer 15.

20 a. Encompass: listed Respondent Kakuuchi as CM and Respondent
21 Nguyen as LO.

22 **Respondent Steiner (Unlicensed Mortgage Loan Originator)**

23 60. The Department discovered Respondent Steiner transacted business in
24 New Hampshire as a mortgage loan originator on or about July 28, 2010 (file
25 started) for Consumer 5 without a New Hampshire Mortgage Loan Originator

1 license, in violation of RSA 397-A:3,II and RSA 397-A:14,IV(d). The Consumer
2 5 residential mortgage loan never closed; Consumer 5 filed a consumer
3 complaint with the Department against Respondent Network Capital.

4 a. Encompass: listed Respondent Steiner as CM and Respondent Nguyen
5 as LO.

6 **Respondent Milakovich (Unlicensed Mortgage Loan Originator)**

7 61. The Department discovered Respondent Milakovich transacted business in
8 New Hampshire as a mortgage loan originator on or about January 24, 2011
9 (file started) for Consumer 6 without a New Hampshire Mortgage Loan
10 Originator license, in violation of RSA 397-A:3,II and RSA 397-A:14,IV(d).
11 The Consumer 6 residential mortgage loan never closed.

12 a. Encompass: listed Respondent Milakovich as CM and no one is
13 listed as the LO.

14 b. Encompass: Respondent Milakovich was the only mortgage loan
15 originator listed in Encompass as working on the Consumer 6 residential
16 mortgage loan.

17 62. The Department discovered Respondent Milakovich transacted business in
18 New Hampshire as a mortgage loan originator on or about February 15, 2011
19 (loan funded) for Consumer 16 without a New Hampshire Mortgage Loan
20 Originator license, in violation of RSA 397-A:3,II and RSA 397-A:14,IV(d).
21 Respondent Milakovich retained a \$832.40 commission, which pursuant to RSA
22 397-A:16,IV should be returned to Consumer 16.

23 a. Encompass: listed Respondent Milakovich as CM and Respondent
24 Nguyen as LO.

25

1 **Respondent Cepeda (Unlicensed Mortgage Loan Originator)**

2 63. The Department discovered Respondent Cepeda transacted business in New
3 Hampshire as a mortgage loan originator on or about April 1, 2011 (file
4 started) for Consumer 7 without a New Hampshire Mortgage Loan Originator
5 license, in violation of RSA 397-A:3,II and RSA 397-A:14,IV(d). As of May
6 11, 2011, the Consumer 7 residential mortgage loan had not closed.

7 a. Encompass: listed Respondent Cepeda as CM and Respondent Rumi as
8 LO.

9 **Respondent Kyle (Unlicensed Mortgage Loan Originator)**

10 64. The Department discovered Respondent Kyle transacted business in New
11 Hampshire as a mortgage loan originator on or about January 24, 2011 (file
12 started) for Consumer 8 without a New Hampshire Mortgage Loan Originator
13 license, in violation of RSA 397-A:3,II and RSA 397-A:14,IV(d). On February
14 18, 2011, the Consumer 8 residential mortgage loan application file was
15 withdrawn.

16 a. Encompass: listed Respondent Kyle as CM and there is no LO
17 listed for the Consumer 8 residential mortgage loan file.

18 **Respondent Bayat (Unlicensed Mortgage Loan Originator)**

19 65. The Department discovered Respondent Bayat transacted business in New
20 Hampshire as a mortgage loan originator on or about November 8, 2010 (file
21 started) for Consumer 9 without a New Hampshire Mortgage Loan Originator
22 license, in violation of RSA 397-A:3,II and RSA 397-A:14,IV(d). As of May
23 11, 2011, the Consumer 9 residential mortgage loan had not closed.

24 a. Encompass: there is no CM or LO listed; however, Respondent
25 Bayat is listed in Encompass as the File Starter. Respondent Bayat sent the

1 initial disclosures and is listed as communicating with Consumer 9
2 throughout the residential mortgage loan application process.

3 b. Respondent Bayat signed a Loan Officer Pay Contract on October
4 1, 2010 which indicated she receives a commission split for loans funded for
5 the month per the Credit Manager Letter of Intent plus any monthly bonus
6 that has been earned.

7 66. The Department discovered Respondent Bayat transacted business in New
8 Hampshire as a mortgage loan originator on or about October 28, 2010 (file
9 started) for Consumer 10 without a New Hampshire Mortgage Loan Originator
10 license, in violation of RSA 397-A:3,II and RSA 397-A:14,IV(d). The file was
11 closed for incompleteness on March 15, 2011.

12 a. Encompass: there is no CM or LO listed; however, Respondent
13 Bayat is listed in Encompass as the File Starter. Respondent Bayat sent
14 email communications to Consumer 10.

15 b. Respondent Bayat signed a Loan Officer Pay Contract on October
16 1, 2010 which indicated she receives a commission split for loans funded for
17 the month per the Credit Manager Letter of Intent plus any monthly bonus
18 that has been earned.

19 67. The Department discovered Respondent Bayat transacted business in New
20 Hampshire as a mortgage loan originator on or about October 20, 2010 (file
21 started) for Consumer 11 without a New Hampshire Mortgage Loan Originator
22 license, in violation of RSA 397-A:3,II and RSA 397-A:14,IV(d). The
23 residential mortgage loan application was withdrawn on March 9, 2011.

24 a. Encompass: there is no CM or LO listed; however, Respondent
25 Bayat is listed in Encompass as the File Starter. Respondent Bayat sent

1 email communications to Consumer 11.

2 b. Respondent Bayat signed a Loan Officer Pay Contract on October
3 1, 2010 which indicated she receives a commission split for loans funded for
4 the month per the Credit Manager Letter of Intent plus any monthly bonus
5 that has been earned.

6 68. The Department discovered Respondent Bayat transacted business in New
7 Hampshire as a mortgage loan originator on or about January 3, 2011 (loan
8 funded) for Consumer 17 without a New Hampshire Mortgage Loan Originator
9 license, in violation of RSA 397-A:3,II and RSA 397-A:14,IV(d). Respondent
10 Bayat retained a \$2,019.40 commission, which pursuant to RSA 397-A:16,IV
11 should be returned to Consumer 17.

12 a. Encompass: listed Respondent Bayat as CM and Respondent Nguyen
13 as LO.

14 69. The Department discovered Respondent Bayat transacted business in New
15 Hampshire as a mortgage loan originator on or about January 20, 2011 (loan
16 funded) for Consumer 18 without a New Hampshire Mortgage Loan Originator
17 license, in violation of RSA 397-A:3,II and RSA 397-A:14,IV(d). Respondent
18 Bayat retained a \$1,628.32 commission, which pursuant to RSA 397-A:16,IV
19 should be returned to Consumer 18.

20 a. Encompass: listed Respondent Bayat as CM and Respondent Nguyen
21 as LO.

22 70. The Department discovered Respondent Bayat transacted business in New
23 Hampshire as a mortgage loan originator on or about March 1, 2011 (loan
24 funded) for Consumer 19 without a New Hampshire Mortgage Loan Originator
25 license, in violation of RSA 397-A:3,II and RSA 397-A:14,IV(d). Respondent

1 Bayat retained a \$2,576.20 commission, which pursuant to RSA 397-A:16,IV
2 should be returned to Consumer 19.

3 a. Encompass: listed Respondent Bayat as CM and Respondent Nguyen
4 as LO.

5 **Respondent Powell (Unlicensed Mortgage Loan Originator)**

6 71. The Department discovered Respondent Powell transacted business in New
7 Hampshire as a mortgage loan originator on or about February 25, 2011 (loan
8 funded) for Consumer 20 without a New Hampshire Mortgage Loan Originator
9 license, in violation of RSA 397-A:3,II and RSA 397-A:14,IV(d). Respondent
10 Powell retained a \$1,502.90 commission, which pursuant to RSA 397-A:16,IV
11 should be returned to Consumer 20.

12 a. Encompass: listed Respondent Powell as CM and Respondent Nguyen
13 as LO.

14 **Respondent Kungl (Unlicensed Mortgage Loan Originator)**

15 72. The Department discovered Respondent Kungl transacted business in New
16 Hampshire as a mortgage loan originator on or about January 31, 2011 (loan
17 funded) for Consumer 21 without a New Hampshire Mortgage Loan Originator
18 license, in violation of RSA 397-A:3,II and RSA 397-A:14,IV(d). Respondent
19 Kungl retained a \$786.25 commission, which pursuant to RSA 397-A:16,IV
20 should be returned to Consumer 21.

21 a. Encompass: listed Respondent Kungl as CM and Respondent Nguyen
22 as LO.

23 73. The Department discovered Respondent Kungl transacted business in New
24 Hampshire as a mortgage loan originator on or about February 28, 2011 (loan
25 funded) for Consumer 22 without a New Hampshire Mortgage Loan Originator

1 license, in violation of RSA 397-A:3,II and RSA 397-A:14,IV(d). Respondent
2 Kungl retained a \$2,052.75 commission, which pursuant to RSA 397-A:16,IV
3 should be returned to Consumer 22.

4 a. Encompass: listed Respondent Kungl as CM and Respondent Nguyen
5 as LO.

6 **Respondent Martin (Unlicensed Mortgage Loan Originator)**

7 74. The Department discovered Respondent Martin transacted business in New
8 Hampshire as a mortgage loan originator on or about April 21, 2011 (loan
9 funded) for Consumer 23 without a New Hampshire Mortgage Loan Originator
10 license, in violation of RSA 397-A:3,II and RSA 397-A:14,IV(d). Respondent
11 Martin retained a \$596.52 commission, which pursuant to RSA 397-A:16,IV
12 should be returned to Consumer 23.

13 a. Encompass: listed Respondent Martin as CM and Respondent Nguyen
14 as LO.

15 **Respondent Kavosi (Unlicensed Mortgage Loan Originator)**

16 75. The Department discovered Respondent Kavosi transacted business in
17 New Hampshire as a mortgage loan originator on or about October 6, 2010
18 (loan funded) for Consumer 24 without a New Hampshire Mortgage Loan
19 Originator license, in violation of RSA 397-A:3,II and RSA 397-A:14,IV(d).
20 Respondent Kavosi retained a \$1,300.05 commission, which pursuant to RSA
21 397-A:16,IV should be returned to Consumer 24.

22 a. Encompass: listed Respondent Kavosi as CM and Respondent Nguyen
23 as LO.

24 76. The Department discovered Respondent Kavosi transacted business in
25 New Hampshire as a mortgage loan originator on or about November 12, 2010

1 (loan funded) for Consumer 25 without a New Hampshire Mortgage Loan
2 Originator license, in violation of RSA 397-A:3,II and RSA 397-A:14,IV(d).
3 Respondent Kavosi retained a \$1,127.99 commission, which pursuant to RSA
4 397-A:16,IV should be returned to Consumer 25.

5 a. Encompass: listed Respondent Kavosi as CM and Respondent Nguyen
6 as LO.

7 **Respondent De Courcy (Unlicensed Mortgage Loan Originator)**

8 77. The Department discovered Respondent De Courcy transacted business in
9 New Hampshire as a mortgage loan originator on or about February 18, 2011
10 (loan funded) for Consumer 26 without a New Hampshire Mortgage Loan
11 Originator license, in violation of RSA 397-A:3,II and RSA 397-A:14,IV(d).
12 Respondent De Courcy retained a \$1,067.20 commission, which pursuant to RSA
13 397-A:16,IV should be returned to Consumer 26.

14 a. Encompass: listed Respondent De Courcy as CM and Respondent
15 Nguyen as LO.

16 **Respondent Parrino (Unlicensed Mortgage Loan Originator)**

17 78. The Department discovered Respondent Parrino transacted business in
18 New Hampshire as a mortgage loan originator on or about February 23, 2011
19 (loan funded) for Consumer 27 without a New Hampshire Mortgage Loan
20 Originator license, in violation of RSA 397-A:3,II and RSA 397-A:14,IV(d).
21 Respondent Parrino retained a \$930.22 commission, which pursuant to RSA 397-
22 A:16,IV should be returned to Consumer 27.

23 a. Encompass: listed Respondent Parrino as CM and Respondent Nguyen
24 as LO.

25 79. The Department discovered Respondent Parrino transacted business in

1 New Hampshire as a mortgage loan originator on or about April 19, 2011 (loan
2 funded) for Consumer 28 without a New Hampshire Mortgage Loan Originator
3 license, in violation of RSA 397-A:3,II and RSA 397-A:14,IV(d). Respondent
4 Parrino retained a \$2,458.94 commission, which pursuant to RSA 397-A:16,IV
5 should be returned to Consumer 28.

6 a. Encompass: listed Respondent Parrino as CM and Respondent Nguyen
7 as LO.

8 **Respondent Dalou (Unlicensed Mortgage Loan Originator)**

9 80. The Department discovered Respondent Dalou transacted business in New
10 Hampshire as a mortgage loan originator on or about April 21, 2011 (loan
11 funded) for Consumer 29 without a New Hampshire Mortgage Loan Originator
12 license, in violation of RSA 397-A:3,II and RSA 397-A:14,IV(d). Respondent
13 Dalou retained a \$959.35 commission, which pursuant to RSA 397-A:16,IV
14 should be returned to Consumer 29.

15 a. Encompass: listed Respondent Dalou as CM and Respondent Rumi as
16 LO.

17 **Respondent Sabeh (Unlicensed Mortgage Loan Originator)**

18 81. The Department discovered Respondent Sabeh transacted business in New
19 Hampshire as a mortgage loan originator on or about April 19, 2011 (loan
20 funded) for Consumer 30 without a New Hampshire Mortgage Loan Originator
21 license, in violation of RSA 397-A:3,II and RSA 397-A:14,IV(d). Respondent
22 Sabeh retained a \$957.27 commission, which pursuant to RSA 397-A:16,IV
23 should be returned to Consumer 30.

24 a. Encompass: listed Respondent Sabeh as CM and Respondent Rumi as
25 LO.

1 82. The Department discovered Respondent Sabeh transacted business in New
2 Hampshire as a mortgage loan originator on or about April 26, 2011 (loan
3 funded) for Consumer 31 without a New Hampshire Mortgage Loan Originator
4 license, in violation of RSA 397-A:3,II and RSA 397-A:14,IV(d). Respondent
5 Sabeh retained a \$996.01 commission, which pursuant to RSA 397-A:16,IV
6 should be returned to Consumer 31.

7 a. Encompass: listed Respondent Sabeh as CM and Respondent Rumi as
8 LO.

9 **Respondent La (Unlicensed Mortgage Loan Originator)**

10 83. The Department discovered Respondent La transacted business in New
11 Hampshire as a mortgage loan originator on or about January 27, 2011 (loan
12 funded) for Consumer 33 without a New Hampshire Mortgage Loan Originator
13 license, in violation of RSA 397-A:3,II and RSA 397-A:14,IV(d). Respondent
14 La retained a \$824.01 commission, which pursuant to RSA 397-A:16,IV should
15 be returned to Consumer 33.

16 a. Encompass: listed Respondent La as CM and Respondent Nguyen as
17 LO.

18 **Respondent Mallo (Unlicensed Mortgage Loan Originator)**

19 84. The Department discovered Respondent Mallo transacted business in New
20 Hampshire as a mortgage loan originator on or about October 18, 2010 (loan
21 funded) for Consumer 34 without a New Hampshire Mortgage Loan Originator
22 license, in violation of RSA 397-A:3,II and RSA 397-A:14,IV(d). Respondent
23 Mallo retained a \$1,991.76 commission, which pursuant to RSA 397-A:16,IV
24 should be returned to Consumer 34.

25 a. Encompass: listed Respondent Mallo as CM and Respondent Nguyen

1 as LO.

2 85. The Department discovered Respondent Mallo transacted business in New
3 Hampshire as a mortgage loan originator on or about October 18, 2010 (loan
4 funded) for Consumer 35 without a New Hampshire Mortgage Loan Originator
5 license, in violation of RSA 397-A:3,II and RSA 397-A:14,IV(d). Respondent
6 Mallo retained a \$2,187.24 commission, which pursuant to RSA 397-A:16,IV
7 should be returned to Consumer 35.

8 a. Encompass: listed Respondent Mallo as CM and Respondent Nguyen
9 as LO.

10 86. The Department discovered Respondent Mallo transacted business in New
11 Hampshire as a mortgage loan originator on or about December 29, 2010 (loan
12 funded) for Consumer 36 without a New Hampshire Mortgage Loan Originator
13 license, in violation of RSA 397-A:3,II and RSA 397-A:14,IV(d). Respondent
14 Mallo retained a \$2,758.80 commission, which pursuant to RSA 397-A:16,IV
15 should be returned to Consumer 36.

16 a. Encompass: listed Respondent Mallo as CM and Respondent Nguyen
17 as LO.

18 87. The Department discovered Respondent Mallo transacted business in New
19 Hampshire as a mortgage loan originator on or about March 22, 2011 (loan
20 funded) for Consumer 37 without a New Hampshire Mortgage Loan Originator
21 license, in violation of RSA 397-A:3,II and RSA 397-A:14,IV(d). Respondent
22 Mallo retained a \$1,000.26 commission, which pursuant to RSA 397-A:16,IV
23 should be returned to Consumer 37.

24 a. Encompass: listed Respondent Mallo as CM and Respondent Nguyen
25 as LO.

1 **Respondent Molavi (Unlicensed Mortgage Loan Originator)**

2 88. The Department discovered Respondent Molavi transacted business in New
3 Hampshire as a mortgage loan originator on or about November 15, 2010 (loan
4 funded) for Consumer 38 without a New Hampshire Mortgage Loan Originator
5 license, in violation of RSA 397-A:3,II and RSA 397-A:14,IV(d). Respondent
6 Molavi retained a \$2,960.00 commission, which pursuant to RSA 397-A:16,IV
7 should be returned to Consumer 38.

8 a. Encompass: listed Respondent Molavi as CM and Respondent Nguyen
9 as LO.

10 **Respondent Biel (Unlicensed Mortgage Loan Originator)**

11 89. The Department discovered Respondent Biel transacted business in New
12 Hampshire as a mortgage loan originator on or about January 31, 2011 (loan
13 funded) for Consumer 39 without a New Hampshire Mortgage Loan Originator
14 license, in violation of RSA 397-A:3,II and RSA 397-A:14,IV(d). Respondent
15 Biel retained a \$1,379.08 commission, which pursuant to RSA 397-A:16,IV
16 should be returned to Consumer 39.

17 a. Encompass: listed Respondent Biel as CM and Respondent Nguyen as
18 LO.

19 **Respondent Benenati (Unlicensed Mortgage Loan Originator)**

20 90. The Department discovered Respondent Benenati transacted business in
21 New Hampshire as a mortgage loan originator on or about November 30, 2010
22 (loan funded) for Consumer 40 without a New Hampshire Mortgage Loan
23 Originator license, in violation of RSA 397-A:3,II and RSA 397-A:14,IV(d).
24 Respondent Beneneati retained a \$979.26 commission, which pursuant to RSA
25 397-A:16,IV should be returned to Consumer 40.

1 a. Encompass: listed Respondent Benenati as CM and Respondent
2 Nguyen as LO.

3 **Respondent Moss (Unlicensed Mortgage Loan Originator)**

4 91. The Department discovered Respondent Moss transacted business in New
5 Hampshire as a mortgage loan originator on or about November 30, 2010 (loan
6 funded) for Consumer 41 without a New Hampshire Mortgage Loan Originator
7 license, in violation of RSA 397-A:3,II and RSA 397-A:14,IV(d). Respondent
8 Moss retained a \$729.12 commission, which pursuant to RSA 397-A:16,IV should
9 be returned to Consumer 41.

10 a. Encompass: listed Respondent Moss as CM and Respondent Nguyen as
11 LO.

12 **Respondent Chough (Unlicensed Mortgage Loan Originator)**

13 92. The Department discovered Respondent Chough transacted business in New
14 Hampshire as a mortgage loan originator on or about January 31, 2011 (loan
15 funded) for Consumer 42 without a New Hampshire Mortgage Loan Originator
16 license, in violation of RSA 397-A:3,II. and RSA 397-A:14,IV(d) Respondent
17 Chough retained a \$1,099.28 commission, which pursuant to RSA 397-A:16,IV
18 should be returned to Consumer 42.

19 a. Encompass: listed Respondent Chough as CM and Respondent Nguyen
20 as LO.

21 93. The Department discovered Respondent Chough transacted business in New
22 Hampshire as a mortgage loan originator on or about April 29, 2011 (loan
23 funded) for Consumer 43 without a New Hampshire Mortgage Loan Originator
24 license, in violation of RSA 397-A:3,II and RSA 397-A:14,IV(d). Respondent
25 Chough retained a \$1,022.45 commission, which pursuant to RSA 397-A:16,IV

1 should be returned to Consumer 43.

2 a. Encompass: listed Respondent Chough as CM and Respondent Rumi as
3 LO.

4 **Respondent Colapinto (Unlicensed Mortgage Loan Originator)**

5 94. The Department discovered Respondent Colapinto transacted business in
6 New Hampshire as a mortgage loan originator on or about June 1, 2010 (loan
7 funded) for Consumer 44 without a New Hampshire Mortgage Loan Originator
8 license, in violation of RSA 397-A:3,II and RSA 397-A:14,IV(d). Respondent
9 Colapinto did not retain a commission on this loan.

10 a. Encompass: listed Respondent Colapinto as CM and Respondent
11 Nguyen as LO.

12 **Respondent Sunbol (Unlicensed Mortgage Loan Originator)**

13 95. The Department discovered Respondent Sunbol transacted business in New
14 Hampshire as a mortgage loan originator on or about November 23, 2010 (loan
15 funded) for Consumer 45 without a New Hampshire Mortgage Loan Originator
16 license, in violation of RSA 397-A:3,II and RSA 397-A:14,IV(d). Respondent
17 Sunbol retained a \$455.20 commission, which pursuant to RSA 397-A:16,IV
18 should be returned to Consumer 45.

19 a. Encompass: listed Respondent Sunbol as CM and Respondent Nguyen
20 as LO.

21 96. The Department discovered Respondent Sunbol transacted business in New
22 Hampshire as a mortgage loan originator on or about March 9, 2011 (loan
23 funded) for Consumer 46 without a New Hampshire Mortgage Loan Originator
24 license, in violation of RSA 397-A:3,II and RSA 397-A:14,IV(d). Respondent
25 Sunbol retained a \$1,086.78 commission, which pursuant to RSA 397-A:16,IV

1 should be returned to Consumer 46.

2 a. Encompass: listed Respondent Sunbol as CM and Respondent Rumi as
3 LO.

4 **Respondent Nelson Nguyen (Unlicensed Mortgage Loan Originator)**

5 97. The Department discovered Respondent Nelson Nguyen transacted business
6 in New Hampshire as a mortgage loan originator on or about January 31, 2011
7 (loan funded) for Consumer 47 without a New Hampshire Mortgage Loan
8 Originator license, in violation of RSA 397-A:3,II and RSA 397-A:14,IV(d).
9 Respondent Nelson Nguyen retained a \$1,185.28 commission, which pursuant to
10 RSA 397-A:16,IV should be returned to Consumer 47.

11 a. Encompass: listed Respondent Nelson Nguyen as CM and Respondent
12 Nguyen as LO.

13 **Respondent Mory (Unlicensed Mortgage Loan Originator)**

14 98. The Department discovered Respondent Mory transacted business in New
15 Hampshire as a mortgage loan originator on or about January 12, 2011 (loan
16 funded) for Consumer 48 without a New Hampshire Mortgage Loan Originator
17 license, in violation of RSA 397-A:3,II and RSA 397-A:14,IV(d). Respondent
18 Mory retained a \$1,024.38 commission, which pursuant to RSA 397-A:16,IV
19 should be returned to Consumer 48.

20 a. Encompass: listed Respondent Mory as CM and Respondent Nguyen as
21 LO.

22 **Respondent Hartnett (Unlicensed Mortgage Loan Originator)**

23 99. The Department discovered Respondent Hartnett transacted business in
24 New Hampshire as a mortgage loan originator on or about January 24, 2011
25 (loan funded) for Consumer 49 without a New Hampshire Mortgage Loan

1 Originator license, in violation of RSA 397-A:3,II and RSA 397-A:14,IV(d).
2 Respondent Hartnett retained a \$793.57 commission, which pursuant to RSA
3 397-A:16,IV should be returned to Consumer 49.

4 a. Encompass: listed Respondent Hartnett as CM and Respondent
5 Nguyen as LO.

6 **Respondent Mercado (Unlicensed Mortgage Loan Originator)**

7 100. The Department discovered Respondent Mercado transacted business in
8 New Hampshire as a mortgage loan originator on or about April 11, 2011 (loan
9 funded) for Consumer 50 without a New Hampshire Mortgage Loan Originator
10 license, in violation of RSA 397-A:3,II and RSA 397-A:14,IV(d). Respondent
11 Mercado retained a \$316.16 commission, which pursuant to RSA 397-A:16,IV
12 should be returned to Consumer 50.

13 a. Encompass: listed Respondent Mercado as CM and Respondent Nguyen
14 as LO.

15 101. The Department discovered Respondent Mercado transacted business in
16 New Hampshire as a mortgage loan originator on or about April 14, 2011 (loan
17 funded) for Consumer 51 without a New Hampshire Mortgage Loan Originator
18 license, in violation of RSA 397-A:3,II and RSA 397-A:14,IV(d). Respondent
19 Mercado did not retain a commission on this loan.

20 a. Encompass: listed Respondent Mercado as CM and Respondent Nguyen
21 as LO.

22 **Respondent Rodriguez (Unlicensed Mortgage Loan Originator)**

23 102. The Department discovered Respondent Rodriguez transacted business in
24 New Hampshire as a mortgage loan originator on or about January 31, 2011
25 (loan funded) for Consumer 52 without a New Hampshire Mortgage Loan

1 Originator license, in violation of RSA 397-A:3,II and RSA 397-A:14,IV(d).
2 Respondent Rodriguez retained a \$622.14 commission, which pursuant to RSA
3 397-A:16,IV should be returned to Consumer 52.

4 a. Encompass: listed Respondent Rodriguez as CM and Respondent
5 Nguyen as LO.

6 **Respondent Curameng (Unlicensed Mortgage Loan Originator)**

7 103. The Department discovered Respondent Curameng transacted business in
8 New Hampshire as a mortgage loan originator on or about August 10, 2010
9 (loan funded) for Consumer 53 without a New Hampshire Mortgage Loan
10 Originator license, in violation of RSA 397-A:3,II and RSA 397-A:14,IV(d).
11 Respondent Rodriguez retained a \$4,096.49 commission, which pursuant to RSA
12 397-A:16,IV should be returned to Consumer 53.

13 a. Encompass: listed Respondent Curameng as CM and Respondent
14 Nguyen as LO.

15 **Respondent Taylor (Unlicensed Mortgage Loan Originator)**

16 104. The Department discovered Respondent Taylor transacted business in New
17 Hampshire as a mortgage loan originator on or about January 31, 2011 (loan
18 funded) for Consumer 54 without a New Hampshire Mortgage Loan Originator
19 license, in violation of RSA 397-A:3,II and RSA 397-A:14,IV(d). Respondent
20 Taylor retained a \$691.37 commission, which pursuant to RSA 397-A:16,IV
21 should be returned to Consumer 54.

22 a. Encompass: listed Respondent Taylor as CM and Respondent Nguyen
23 as LO.

24 **Respondent Lee (Unlicensed Mortgage Loan Originator)**

25 105. The Department discovered Respondent Lee transacted business in New

1 Hampshire as a mortgage loan originator on or about November 22, 2010 (loan
2 funded) for Consumer 55 without a New Hampshire Mortgage Loan Originator
3 license, in violation of RSA 397-A:3,II and RSA 397-A:14,IV(d). Respondent
4 Lee retained a \$1,696.14 commission, which pursuant to RSA 397-A:16,IV
5 should be returned to Consumer 55.

6 a. Encompass: listed Respondent Lee as CM and Respondent Nguyen as
7 LO.

8 **Respondent Estrada (Current Licensed Mortgage Loan Originator)**

9 106. The Department discovered Respondent Estrada violated RSA 397-
10 A:2,VI(c) and RSA 397-A:14,IV(d) by placing his name on the closing
11 documents for the Consumer 1 residential mortgage loan as the licensed
12 mortgage loan originator when Respondent Hanley had originated this
13 residential mortgage loan. Respondent Estrada signed a Loan Officer Pay
14 Contract on December 20, 2010 stating he receives a 50% commission split for
15 loans funded for the month.

16 107. The Department discovered Respondent Estrada (prior to his licensure)
17 transacted business in New Hampshire as a mortgage loan originator on or
18 about July 12, 2010 (loan funded) for Consumer 32 without a New Hampshire
19 Mortgage Loan Originator license, in violation of RSA 397-A:3,II and RSA
20 397-A:14,IV(d). Respondent Estrada retained a \$1,830.30 commission, which
21 pursuant to RSA 397-A:16,IV should be returned to Consumer 32.

22 a. Encompass: listed Respondent Estrada as CM and Respondent Nguyen
23 as LO.

24 **Respondent Nguyen (Licensed Mortgage Loan Originator)**

25 108. The Department discovered Respondent Nguyen violated RSA 397-A:2,VI(c)

1 and RSA 397-A:14,IV(d) by placing his name on the closing documents for the
2 Consumer 2 residential mortgage loan as the licensed mortgage loan
3 originator when Respondent Johnson had originated this residential mortgage
4 loan. Respondent Nguyen was not paid on this loan.

5 109. The Department discovered Respondent Nguyen violated RSA 397-A:2,VI(c)
6 and RSA 397-A:14,IV(d) by placing his name on the closing documents for the
7 Consumer 3 residential mortgage loan as the licensed mortgage loan
8 originator when Respondent Krol had originated this residential mortgage
9 loan. Respondent Nguyen was not paid on this loan.

10 110. The Department discovered Respondent Nguyen violated RSA 397-A:2,VI(c)
11 and RSA 397-A:14,IV(d) by placing his name on the closing documents for the
12 Consumer 4 residential mortgage loan as the licensed mortgage loan
13 originator when Respondent Kakuuchi had originated this residential mortgage
14 loan. Respondent Nguyen was not paid on this loan.

15 111. The Department discovered Respondent Nguyen violated RSA 397-A:2,VI(c)
16 and RSA 397-A:14,IV(d) by placing his name on the initial documents for the
17 Consumer 5 residential mortgage loan as the licensed mortgage loan
18 originator when Respondent Steiner had begun to originate this residential
19 mortgage loan. Respondent Nguyen was not paid on this loan and the loan
20 never closed.

21 112. The Department discovered Respondent Nguyen violated RSA 397-A:2,VI(c)
22 and RSA 397-A:14,IV(d) by placing his name on the closing documents for the
23 Consumer 12 residential mortgage loan as the licensed mortgage loan
24 originator when Respondent Hanley had originated this residential mortgage
25 loan. Respondent Nguyen was not paid on this loan.

1 113. The Department discovered Respondent Nguyen violated RSA 397-A:2,VI(c)
2 and RSA 397-A:14,IV(d) by placing his name on the closing documents for the
3 Consumer 13 residential mortgage loan as the licensed mortgage loan
4 originator when Respondent Hanley had originated this residential mortgage
5 loan. Respondent Nguyen was not paid on this loan.

6 114. The Department discovered Respondent Nguyen violated RSA 397-A:2,VI(c)
7 and RSA 397-A:14,IV(d) by placing his name on the closing documents for the
8 Consumer 14 residential mortgage loan as the licensed mortgage loan
9 originator when Respondent Kakuuchi had originated this residential mortgage
10 loan. Respondent Nguyen was not paid on this loan.

11 115. The Department discovered Respondent Nguyen violated RSA 397-A:2,VI(c)
12 and RSA 397-A:14,IV(d) by placing his name on the closing documents for the
13 Consumer 15 residential mortgage loan as the licensed mortgage loan
14 originator when Respondent Kakuuchi had originated this residential mortgage
15 loan. Respondent Nguyen was not paid on this loan.

16 116. The Department discovered Respondent Nguyen violated RSA 397-A:2,VI(c)
17 and RSA 397-A:14,IV(d) by placing his name on the closing documents for the
18 Consumer 16 residential mortgage loan as the licensed mortgage loan
19 originator when Respondent Milakovich had originated this residential
20 mortgage loan. Respondent Nguyen was not paid on this loan.

21 117. The Department discovered Respondent Nguyen violated RSA 397-A:2,VI(c)
22 and RSA 397-A:14,IV(d) by placing his name on the closing documents for the
23 Consumer 17 residential mortgage loan as the licensed mortgage loan
24 originator when Respondent Bayat had originated this residential mortgage
25 loan. Respondent Nguyen was not paid on this loan.

1 118. The Department discovered Respondent Nguyen violated RSA 397-A:2,VI(c)
2 and RSA 397-A:14,IV(d) by placing his name on the closing documents for the
3 Consumer 18 residential mortgage loan as the licensed mortgage loan
4 originator when Respondent Bayat had originated this residential mortgage
5 loan. Respondent Nguyen was not paid on this loan.

6 119. The Department discovered Respondent Nguyen violated RSA 397-A:2,VI(c)
7 and RSA 397-A:14,IV(d) by placing his name on the closing documents for the
8 Consumer 19 residential mortgage loan as the licensed mortgage loan
9 originator when Respondent Bayat had originated this residential mortgage
10 loan. Respondent Nguyen was not paid on this loan.

11 120. The Department discovered Respondent Nguyen violated RSA 397-A:2,VI(c)
12 and RSA 397-A:14,IV(d) by placing his name on the closing documents for the
13 Consumer 20 residential mortgage loan as the licensed mortgage loan
14 originator when Respondent Powell had originated this residential mortgage
15 loan. Respondent Nguyen was not paid on this loan.

16 121. The Department discovered Respondent Nguyen violated RSA 397-A:2,VI(c)
17 and RSA 397-A:14,IV(d) by placing his name on the closing documents for the
18 Consumer 21 residential mortgage loan as the licensed mortgage loan
19 originator when Respondent Kungl had originated this residential mortgage
20 loan. Respondent Nguyen was not paid on this loan.

21 122. The Department discovered Respondent Nguyen violated RSA 397-A:2,VI(c)
22 and RSA 397-A:14,IV(d) by placing his name on the closing documents for the
23 Consumer 22 residential mortgage loan as the licensed mortgage loan
24 originator when Respondent Kungl had originated this residential mortgage
25 loan. Respondent Nguyen was not paid on this loan.

1 123. The Department discovered Respondent Nguyen violated RSA 397-A:2,VI(c)
2 and RSA 397-A:14,IV(d) by placing his name on the closing documents for the
3 Consumer 23 residential mortgage loan as the licensed mortgage loan
4 originator when Respondent Martin had originated this residential mortgage
5 loan. Respondent Nguyen was not paid on this loan.

6 124. The Department discovered Respondent Nguyen violated RSA 397-A:2,VI(c)
7 and RSA 397-A:14,IV(d) by placing his name on the closing documents for the
8 Consumer 24 residential mortgage loan as the licensed mortgage loan
9 originator when Respondent Kavooosi had originated this residential mortgage
10 loan. Respondent Nguyen was not paid on this loan.

11 125. The Department discovered Respondent Nguyen violated RSA 397-A:2,VI(c)
12 and RSA 397-A:14,IV(d) by placing his name on the closing documents for the
13 Consumer 25 residential mortgage loan as the licensed mortgage loan
14 originator when Respondent Kavooosi had originated this residential mortgage
15 loan. Respondent Nguyen was not paid on this loan.

16 126. The Department discovered Respondent Nguyen violated RSA 397-A:2,VI(c)
17 and RSA 397-A:14,IV(d) by placing his name on the closing documents for the
18 Consumer 26 residential mortgage loan as the licensed mortgage loan
19 originator when Respondent De Courcy had originated this residential
20 mortgage loan. Respondent Nguyen was not paid on this loan.

21 127. The Department discovered Respondent Nguyen violated RSA 397-A:2,VI(c)
22 and RSA 397-A:14,IV(d) by placing his name on the closing documents for the
23 Consumer 27 residential mortgage loan as the licensed mortgage loan
24 originator when Respondent Parrino had originated this residential mortgage
25 loan. Respondent Nguyen was not paid on this loan.

1 128. The Department discovered Respondent Nguyen violated RSA 397-A:2,VI(c)
2 and RSA 397-A:14,IV(d) by placing his name on the closing documents for the
3 Consumer 28 residential mortgage loan as the licensed mortgage loan
4 originator when Respondent Parrino had originated this residential mortgage
5 loan. Respondent Nguyen was not paid on this loan.

6 129. The Department discovered Respondent Nguyen violated RSA 397-A:2,VI(c)
7 and RSA 397-A:14,IV(d) by placing his name on the closing documents for the
8 Consumer 32 residential mortgage loan as the licensed mortgage loan
9 originator when Respondent Estrada had originated this residential mortgage
10 loan. Respondent Nguyen was not paid on this loan.

11 130. The Department discovered Respondent Nguyen violated RSA 397-A:2,VI(c)
12 and RSA 397-A:14,IV(d) by placing his name on the closing documents for the
13 Consumer 33 residential mortgage loan as the licensed mortgage loan
14 originator when Respondent La had originated this residential mortgage loan.
15 Respondent Nguyen was not paid on this loan.

16 131. The Department discovered Respondent Nguyen violated RSA 397-A:2,VI(c)
17 and RSA 397-A:14,IV(d) by placing his name on the closing documents for the
18 Consumer 34 residential mortgage loan as the licensed mortgage loan
19 originator when Respondent Mallo had originated this residential mortgage
20 loan. Respondent Nguyen was not paid on this loan.

21 132. The Department discovered Respondent Nguyen violated RSA 397-A:2,VI(c)
22 and RSA 397-A:14,IV(d) by placing his name on the closing documents for the
23 Consumer 35 residential mortgage loan as the licensed mortgage loan
24 originator when Respondent Mallo had originated this residential mortgage
25 loan. Respondent Nguyen was not paid on this loan.

1 133. The Department discovered Respondent Nguyen violated RSA 397-A:2,VI(c)
2 and RSA 397-A:14,IV(d) by placing his name on the closing documents for the
3 Consumer 36 residential mortgage loan as the licensed mortgage loan
4 originator when Respondent Mallo had originated this residential mortgage
5 loan. Respondent Nguyen was not paid on this loan.

6 134. The Department discovered Respondent Nguyen violated RSA 397-A:2,VI(c)
7 and RSA 397-A:14,IV(d) by placing his name on the closing documents for the
8 Consumer 37 residential mortgage loan as the licensed mortgage loan
9 originator when Respondent Mallo had originated this residential mortgage
10 loan. Respondent Nguyen was not paid on this loan.

11 135. The Department discovered Respondent Nguyen violated RSA 397-A:2,VI(c)
12 and RSA 397-A:14,IV(d) by placing his name on the closing documents for the
13 Consumer 38 residential mortgage loan as the licensed mortgage loan
14 originator when Respondent Molavi had originated this residential mortgage
15 loan. Respondent Nguyen was not paid on this loan.

16 136. The Department discovered Respondent Nguyen violated RSA 397-A:2,VI(c)
17 and RSA 397-A:14,IV(d) by placing his name on the closing documents for the
18 Consumer 39 residential mortgage loan as the licensed mortgage loan
19 originator when Respondent Biel had originated this residential mortgage
20 loan. Respondent Nguyen was not paid on this loan.

21 137. The Department discovered Respondent Nguyen violated RSA 397-A:2,VI(c)
22 and RSA 397-A:14,IV(d) by placing his name on the closing documents for the
23 Consumer 40 residential mortgage loan as the licensed mortgage loan
24 originator when Respondent Benenati had originated this residential mortgage
25 loan. Respondent Nguyen was not paid on this loan.

1 138. The Department discovered Respondent Nguyen violated RSA 397-A:2,VI(c)
2 and RSA 397-A:14,IV(d) by placing his name on the closing documents for the
3 Consumer 41 residential mortgage loan as the licensed mortgage loan
4 originator when Respondent Moss had originated this residential mortgage
5 loan. Respondent Nguyen was not paid on this loan.

6 139. The Department discovered Respondent Nguyen violated RSA 397-A:2,VI(c)
7 and RSA 397-A:14,IV(d) by placing his name on the closing documents for the
8 Consumer 42 residential mortgage loan as the licensed mortgage loan
9 originator when Respondent Chough had originated this residential mortgage
10 loan. Respondent Nguyen was not paid on this loan.

11 140. The Department discovered Respondent Nguyen violated RSA 397-A:2,VI(c)
12 and RSA 397-A:14,IV(d) by placing his name on the closing documents for the
13 Consumer 44 residential mortgage loan as the licensed mortgage loan
14 originator when Respondent Colapinto had originated this residential
15 mortgage loan. Respondent Nguyen was not paid on this loan.

16 141. The Department discovered Respondent Nguyen violated RSA 397-A:2,VI(c)
17 and RSA 397-A:14,IV(d) by placing his name on the closing documents for the
18 Consumer 45 residential mortgage loan as the licensed mortgage loan
19 originator when Respondent Sunbol had originated this residential mortgage
20 loan. Respondent Nguyen was not paid on this loan.

21 142. The Department discovered Respondent Nguyen violated RSA 397-A:2,VI(c)
22 and RSA 397-A:14,IV(d) by placing his name on the closing documents for the
23 Consumer 47 residential mortgage loan as the licensed mortgage loan
24 originator when Respondent Nelson Nguyen had originated this residential
25 mortgage loan. Respondent Nguyen was not paid on this loan.

1 143. The Department discovered Respondent Nguyen violated RSA 397-A:2,VI(c)
2 and RSA 397-A:14,IV(d) by placing his name on the closing documents for the
3 Consumer 48 residential mortgage loan as the licensed mortgage loan
4 originator when Respondent Mory had originated this residential mortgage
5 loan. Respondent Nguyen was not paid on this loan.

6 144. The Department discovered Respondent Nguyen violated RSA 397-A:2,VI(c)
7 and RSA 397-A:14,IV(d) by placing his name on the closing documents for the
8 Consumer 49 residential mortgage loan as the licensed mortgage loan
9 originator when Respondent Hartnett had originated this residential mortgage
10 loan. Respondent Nguyen was not paid on this loan.

11 145. The Department discovered Respondent Nguyen violated RSA 397-A:2,VI(c)
12 and RSA 397-A:14,IV(d) by placing his name on the closing documents for the
13 Consumer 50 residential mortgage loan as the licensed mortgage loan
14 originator when Respondent Mercado had originated this residential mortgage
15 loan. Respondent Nguyen was not paid on this loan.

16 146. The Department discovered Respondent Nguyen violated RSA 397-A:2,VI(c)
17 and RSA 397-A:14,IV(d) by placing his name on the closing documents for the
18 Consumer 51 residential mortgage loan as the licensed mortgage loan
19 originator when Respondent Mercado had originated this residential mortgage
20 loan. Respondent Nguyen was not paid on this loan.

21 147. The Department discovered Respondent Nguyen violated RSA 397-A:2,VI(c)
22 and RSA 397-A:14,IV(d) by placing his name on the closing documents for the
23 Consumer 52 residential mortgage loan as the licensed mortgage loan
24 originator when Respondent Rodriguez had originated this residential
25 mortgage loan. Respondent Nguyen was not paid on this loan.

1 148. The Department discovered Respondent Nguyen violated RSA 397-A:2,VI(c)
2 and RSA 397-A:14,IV(d) by placing his name on the closing documents for the
3 Consumer 53 residential mortgage loan as the licensed mortgage loan
4 originator when Respondent Curameng had originated this residential mortgage
5 loan. Respondent Nguyen was not paid on this loan.

6 149. The Department discovered Respondent Nguyen violated RSA 397-A:2,VI(c)
7 and RSA 397-A:14,IV(d) by placing his name on the closing documents for the
8 Consumer 54 residential mortgage loan as the licensed mortgage loan
9 originator when Respondent Taylor had originated this residential mortgage
10 loan. Respondent Nguyen was not paid on this loan.

11 150. The Department discovered Respondent Nguyen violated RSA 397-A:2,VI(c)
12 and RSA 397-A:14,IV(d) by placing his name on the closing documents for the
13 Consumer 55 residential mortgage loan as the licensed mortgage loan
14 originator when Respondent Lee had originated this residential mortgage
15 loan. Respondent Nguyen was not paid on this loan.

16 **Respondent Nguyen's RSA 397-A:14,IV(d) violations regarding other**

17 **Consumers:**

18 151. The Department discovered Respondent Nguyen violated RSA 397-
19 A:14,IV(d) by assisting or aiding and abetting the mortgage loan originators
20 named as Respondents in the conduct of business without a valid New
21 Hampshire Mortgage Loan Originator license. Respondent Nguyen violated RSA
22 397-A:14,IV(d) for the residential mortgage loans in which he was not named
23 the LO, in addition to the residential mortgage loans in which he was named
24 LO. The residential mortgage loans for which he was not named the LO are
25 those for Consumers 1, 7, 29, 30, 31, 32, 43 and 46.

1 Respondent Nguyen's RSA 397-A:6,I violations regarding supervision:

2 152. Respondent Nguyen failed to supervise his two (2) licensed and thirty-
3 four (34) unlicensed New Hampshire Mortgage Loan Originators in violation of
4 RSA 397-A:6,I.

5 Respondent Rumi (Licensed Mortgage Loan Originator)

6 153. The Department discovered Respondent Rumi violated RSA 397-A:2,VI(c)
7 and RSA 397-A:14,IV(d) by placing his name on the initial documents for the
8 Consumer 7 residential mortgage loan as the licensed mortgage loan
9 originator when Respondent Cepeda had begun to originate this residential
10 mortgage loan. Respondent Cepeda was not paid on this loan and the loan had
11 not closed as of the end date of the Department's examination of Respondent
12 Network Capital.

13 154. The Department discovered Respondent Rumi violated RSA 397-A:2,VI(c)
14 and RSA 397-A:14,IV(d) by placing his name on the closing documents for the
15 Consumer 29 residential mortgage loan as the licensed mortgage loan
16 originator when Respondent Dalou had originated this residential mortgage
17 loan. Respondent Rumi was not paid on this loan.

18 155. The Department discovered Respondent Rumi violated RSA 397-A:2,VI(c)
19 and RSA 397-A:14,IV(d) by placing his name on the closing documents for the
20 Consumer 30 residential mortgage loan as the licensed mortgage loan
21 originator when Respondent Sabeh had originated this residential mortgage
22 loan. Respondent Rumi was not paid on this loan.

23 156. The Department discovered Respondent Rumi violated RSA 397-A:2,VI(c)
24 and RSA 397-A:14,IV(d) by placing his name on the closing documents for the
25 Consumer 31 residential mortgage loan as the licensed mortgage loan

1 originator when Respondent Sabeh had originated this residential mortgage
2 loan. Respondent Rumi was not paid on this loan.

3 157. The Department discovered Respondent Rumi violated RSA 397-A:2,VI(c)
4 and RSA 397-A:14,IV(d) by placing his name on the closing documents for the
5 Consumer 43 residential mortgage loan as the licensed mortgage loan
6 originator when Respondent Chough had originated this residential mortgage
7 loan. Respondent Rumi was not paid on this loan.

8 158. The Department discovered Respondent Rumi violated RSA 397-A:2,VI(c)
9 and RSA 397-A:14,IV(d) by placing his name on the closing documents for the
10 Consumer 46 residential mortgage loan as the licensed mortgage loan
11 originator when Respondent Sunbol had originated this residential mortgage
12 loan. Respondent Rumi was not paid on this loan.

13 **Remaining Respondent Network Capital (Non-Mortgage Loan Originator)**

14 159. The Department discovered Respondent Network Capital violated RSA 397-
15 A:14,IV(d) by assisting or aiding and abetting the mortgage loan originators
16 named as Respondents in the conduct of business without a valid New
17 Hampshire Mortgage Loan Originator license. Respondent Network Capital
18 violated RSA 397-A:14,IV(d) for the residential mortgage loans in which the
19 CMs named were unlicensed New Hampshire Mortgage Loan Originators and the
20 LO's named were licensed New Hampshire Mortgage Loan Originators. The
21 residential mortgage loans were for Consumers 1 through 55.

22 160. Respondent Network Capital employed, retained, or otherwise engaged
23 thirty-four (34) unlicensed New Hampshire Mortgage Loan Originators, in
24 violation of RSA 397-A:3,III.

25 161. Respondent Network Capital failed to supervise its three (3) licensed

1 and thirty-four (34) unlicensed New Hampshire Mortgage Loan Originators in
2 violation of RSA 397-A:6,I.

3 **Failure to Provide or Timely Provide Documents to Consumers:**

4 162. Respondents Network Capital and Respondent Nguyen failed to provide
5 the initial Good Faith Estimate ("GFE") within three days of the consumer's
6 application, in violation of RSA 397-A:16,I:

7 a. The Consumer 1 file began on March 20, 2011; but the initial GFE
8 was not sent until March 29, 2011; and

9 b. The Consumer 8 file began on January 24, 2011, but no initial
10 documents (including a GFE) were sent even though Respondents collected
11 enough information for a complete application; and

12 c. The Consumer 9 file began on November 8, 2010. No initial
13 disclosures were sent (including a GFE) until January 18, 2011; and

14 d. The Consumer 10 file began on October 28, 2010 but no initial
15 documents (including a GFE) were sent even though Respondents collected
16 enough information for a complete application; and

17 e. The Consumer 11 file began October 20, 2010 but no initial
18 documents (including a GFE) were sent even though Respondents collected
19 enough information for a complete application.

20 **RESPA Violations for improperly requiring supplemental information before a**

21 **GFE is given to the Consumer:**

22 163. Respondents Network Capital and Respondent Nguyen required applicants
23 to submit supplemental documentation to verify the information provided on
24 the application as a condition for providing a GFE to the consumer, in
25 violation of RSA 397-A:2,III referencing the Real Estate Settlement

1 Procedures Act, Regulation X, 24 C.F.R. §3500.7(a)(5):

2 a. The Consumer 1 file began on March 20, 2011; but the initial
3 GFE was not sent until March 29, 2011 when Respondents received Consumer 1's
4 W2s. Further, Respondents tried to change the date by changing the initial
5 signed Truth in Lending to April 8, 2011 instead of when it was actually
6 signed on March 21, 2011; and

7 b. The Consumer 8 file began on January 24, 2011, but no initial
8 documents (including a GFE) were sent even though Respondents collected
9 enough information for a complete application; and

10 c. The Consumer 9 file began on November 8, 2010. No initial
11 disclosures were sent (including a GFE) until January 18, 2011; and

12 d. The Consumer 10 file began on October 28, 2010 but no initial
13 documents (including a GFE) were sent even though Respondents collected
14 enough information for a complete application; and

15 e. The Consumer 11 file began October 20, 2010 but no initial
16 documents (including a GFE) were sent even though Respondents collected
17 enough information for a complete application.

18 **False Statement to the Commissioner/Dishonest or Unethical Business**

19 **Practices:**

20 164. On or about January 13, 2011, the Department received a consumer
21 complaint from Consumer 5, wherein Consumer 5 alleged after limited
22 communication from Respondent Network Capital, Respondent Steiner and
23 Respondent Nguyen, Respondents failed to communicate with Consumer 5 and
24 never produced a Letter of Denial.

25 165. Consumer 5's file began with Respondents on July 28, 2010. Consumer 5

1 alleged that Consumer 5 spoke to Respondent Steiner regarding the
2 refinancing of two properties, which Respondents' records show as accurate.
3 Respondent Steiner was listed as the CM on both properties.

4 166. Consumer 5 alleged Respondent Steiner indicated that Consumer 5 would
5 not need appraisals and then on another occasion telephoned Consumer 5 to
6 inform Consumer 5 that appraisals were indeed needed. No documentation
7 exists in the Respondents' files to document these communications; however,
8 Consumer 5 did obtain two appraisals and paid for them.

9 167. Consumer 5 then continually asked for appraisals in September and
10 October of 2010 and Respondents Network Capital, Nguyen and Steiner were
11 procrastinating and wished to apply to another bank. These appraisals were
12 done in late October.

13 168. Consumer 5 alleged Respondent Steiner suggested falsely declaring
14 income from two empty apartments. Evidence of this communication cannot be
15 confirmed; however, there is evidence that in November of 2010 the file was
16 still being worked and the debt-to-income ratio was too high. Consumer 5
17 would have needed an increased income in order to qualify for the loans.

18 169. Respondent Steiner left Respondent Network Capital on November 30,
19 2010.

20 170. On February 9, 2011, Respondent Nguyen wrote that Consumer 5's loan
21 was declined, to which Consumer 5 replied that a Notice of Denial was never
22 received. As a result, on April 7, 2011, the Department requested a copy of
23 the Notice of Denial from Respondent Network Capital and Respondent Nguyen.
24 In response, Respondent Network Capital and Respondent Nguyen provided a
25 post-dated Notice of Denial with a date of April 28, 2011.

1 171. When the Department questioned the April 28, 2011 date on the Notice
2 of Denial, Respondent Nguyen indicated he did not know how that happened and
3 provided another Notice of Denial, this one dated October 28, 2010.

4 172. In Respondent Network Capital's computer system, the loan status to
5 denial was not changed until April 7, 2011, the date the Department
6 requested Respondents produce the Notice of Denial.

7 173. Respondent Network Capital and Respondent Nguyen made a false or
8 misleading statement to the commissioner by fabrication of a Notice of
9 Denial for Consumer 5, in violation of RSA 397-A:17,I(e) and (k) and RSA
10 397-A:14,IV(f) (violation of the Equal Credit Opportunity Act).

11 174. Respondent Network Capital failed to supervise Respondents Nguyen and
12 Steiner, in violation of RSA 397-A:17,I(g).

13 175. Respondent Nguyen failed to supervise Respondent Steiner, in violation
14 of RSA 397-A:17,I(g).

15 176. Respondents Network Capital and Respondent Nguyen failed to provide an
16 Adverse Action Notice within 30 days, in violation of RSA 397-A:2,III
17 referencing the Equal Credit Opportunity Act, Regulation B, 12 C.F.R.
18 §202.9.

19 _____ /s/
Maryam Torben Desfosses
20 Hearings Examiner

September 27, 2011
Date

21 **ORDER**

22 177. **I hereby find as follows:**

23 a. Pursuant to RSA 397-A:17,I, the facts as alleged above, if true,
24 show Respondents are operating or have operated in violation of RSA Chapter
25 397-A and form the legal basis for this Order;

1 b. Pursuant to RSA 397-A:20,VI, this Order is necessary and
2 appropriate to the public interest and for the protection of consumers and
3 consistent with the purpose and intent of New Hampshire banking laws;

4 c. The Department finds pursuant to RSA 397-A:17,II and RSA 397-
5 A:18,II, reasonable cause to issue an order to cease and desist; and

6 d. Pursuant to RSA 397-A:17 and RSA 397-A:18, if Respondents fail
7 to respond to this Order and/or defaults then all facts as alleged herein
8 are deemed as true.

9 **178. Accordingly, it is hereby ORDERED that:**

10 a. Respondents shall cease and desist from violating RSA Chapter
11 397-A and rules or orders thereunder;

12 b. Respondents shall show cause why Respondent Network Capital's
13 New Hampshire Mortgage Banker license should not be revoked;

14 c. Respondents shall show cause why Respondent Nguyen's New
15 Hampshire Mortgage Loan Originator license should not be revoked;

16 d. Respondents shall show cause why Respondent Estrada's New
17 Hampshire Mortgage Loan Originator license should not be revoked;

18 e. Respondents shall show cause why Respondent Rumi's New Hampshire
19 Mortgage Loan Originator license should not be revoked;

20 f. Respondents shall show cause why Respondent Bayat's New
21 Hampshire Mortgage Loan Originator license should not be revoked;

22 g. Respondents shall show cause why Respondent Molavi's New
23 Hampshire Mortgage Loan Originator license should not be revoked;

24 h. Respondents shall show cause why an administrative fine of up to
25 a maximum of \$2,500.00 per violation should not be imposed as follows:

1 (1). Respondent Network Capital:

2 Violation #1: Violating federal and state laws (RSA 397-
3 A:2,III) - 6 Counts;

4 Violation #2: Employed, Retained, or Otherwise Engaged
5 Unlicensed New Hampshire Mortgage Loan Originators (RSA
6 397-A:3,III) - 34 Counts;

7 Violation #3: Failure to supervise (RSA 397-A:6,I) - 37
8 Counts;

9 Violation #4: Assist or aid and abet any person in the
10 conduct of business under RSA Chapter 397-A without a
11 valid New Hampshire Mortgage Loan Originator license (RSA
12 397-A:14,IV(d)) - 55 Counts;

13 Violation #5: Violation of the Equal Credit Opportunity
14 Act (RSA 397-A:14,IV(f)) - 1 Count;

15 Violation #6: Failure to provide/timely provide Good Faith
16 Estimate (RSA 397-A:16,I) - 5 Counts;

17 Violation #7: False or Misleading Statement to the
18 Commissioner (RSA 397-A:17,I(e)) - 1 Count;

19 Violation #8: Failure to supervise agents, originators,
20 managers or employees (RSA 397-A:17,I(g)) - 2 Counts;

21 Violation #9: Engaged in Dishonest or Unethical Practices
22 (RSA 397-A:17,I(k)) - 1 Count;

23 (2). Respondent Nguyen (as Direct Owner, Principal, Control
24 Person and Licensed Mortgage Loan Originator):

25 Violation #1: Violating of federal and state laws (RSA

1 397-A:2,III) - 11 Counts;

2 Violation #2: Engaged in Act or practice that or course of
3 business which operated as a fraud or deceit (RSA 397-
4 A:2,VI(c)) - 51 Counts;

5 Violation #3: Failure to supervise (RSA 397-A:6,I) - 36
6 Counts;

7 Violation #4: Assist or aid and abet any person in the
8 conduct of business under RSA Chapter 397-A without a
9 valid New Hampshire Mortgage Loan Originator License (RSA
10 397-A:14,IV(d)) - 51 Counts;

11 Violation #5: Violation of the Equal Credit Opportunity
12 Act (RSA 397-A:14,IV(f)) - 1 Count;

13 Violation #6: Failure to provide/timely provide Good Faith
14 Estimate (RSA 397-A:16,I) - 5 Counts;

15 Violation #7: False or Misleading Statement to the
16 Commissioner (RSA 397-A:17,I(e)) - 1 Count;

17 Violation #8: Failure to supervise agents, originators,
18 managers or employees (RSA 397-A:17,I(g)) - 1 Count;

19 Violation #9: Engaged in Dishonest or Unethical Practices
20 (RSA 397-A:17,I(k)) - 1 Count;

21 (3). Respondent Hanley (Unlicensed Mortgage Loan Originator):

22 Violation #1: Transacted business without a valid New
23 Hampshire Mortgage Loan Originator license (RSA 397-
24 A:3,II) - 3 Counts;

25 Violation #2: Conducted business without holding a valid

1 license (RSA 397-A:14,IV(d)) - 3 Counts;

2 (4). Respondent Johnson (Unlicensed Mortgage Loan Originator):

3 Violation #1: Transacted business without a valid New
4 Hampshire Mortgage Loan Originator license (RSA 397-
5 A:3,II) - 1 Count;

6 Violation #2: Conducted business without holding a valid
7 license (RSA 397-A:14,IV(d)) - 1 Count;

8 (5). Respondent Krol (Unlicensed Mortgage Loan Originator):

9 Violation #1: Transacted business without a valid New
10 Hampshire Mortgage Loan Originator license (RSA 397-
11 A:3,II) - 1 Count;

12 Violation #2: Conducted business without holding a valid
13 license (RSA 397-A:14,IV(d)) - 1 Count;

14 (6). Respondent Kakuuchi (Unlicensed Mortgage Loan Originator):

15 Violation #1: Transacted business without a valid New
16 Hampshire Mortgage Loan Originator license (RSA 397-
17 A:3,II) - 3 Counts;

18 Violation #2: Conducted business without holding a valid
19 license (RSA 397-A:14,IV(d)) - 3 Counts;

20 (7). Respondent Steiner (Unlicensed Mortgage Loan Originator):

21 Violation #1: Transacted business without a valid New
22 Hampshire Mortgage Loan Originator license (RSA 397-
23 A:3,II) - 1 Count;

24 Violation #2: Conducted business without holding a valid
25 license (RSA 397-A:14,IV(d)) - 1 Count;

1 (8). Respondent Milakovich (Unlicensed Mortgage Loan
2 Originator):

3 Violation #1: Transacted business without a valid New
4 Hampshire Mortgage Loan Originator license (RSA 397-
5 A:3,II) - 2 Counts;

6 Violation #2: Conducted business without holding a valid
7 license (RSA 397-A:14,IV(d)) - 2 Counts;

8 (9). Respondent Cepeda (Unlicensed Mortgage Loan Originator):

9 Violation #1: Transacted business without a valid New
10 Hampshire Mortgage Loan Originator license (RSA 397-
11 A:3,II) - 1 Count;

12 Violation #2: Conducted business without holding a valid
13 license (RSA 397-A:14,IV(d)) - 1 Count;

14 (10). Respondent Kyle (Unlicensed Mortgage Loan Originator):

15 Violation #1: Transacted business without a valid New
16 Hampshire Mortgage Loan Originator license (RSA 397-
17 A:3,II) - 1 Count;

18 Violation #2: Conducted business without holding a valid
19 license (RSA 397-A:14,IV(d)) - 1 Count;

20 (11). Respondent Bayat (Licensed Mortgage Loan Originator):

21 Violation #1: Transacted business without a valid New
22 Hampshire Mortgage Loan Originator license (RSA 397-
23 A:3,II) - 6 Counts;

24 Violation #2: Conducted business without holding a valid
25 license (RSA 397-A:14,IV(d)) - 6 Counts;

1 (12). Respondent Powell (Unlicensed Mortgage Loan Originator):

2 Violation #1: Transacted business without a valid New
3 Hampshire Mortgage Loan Originator license (RSA 397-
4 A:3,II) - 1 Count;

5 Violation #2: Conducted business without holding a valid
6 license (RSA 397-A:14,IV(d)) - 1 Count;

7 (13). Respondent Kungl (Unlicensed Mortgage Loan Originator):

8 Violation #1: Transacted business without a valid New
9 Hampshire Mortgage Loan Originator license (RSA 397-
10 A:3,II) - 2 Counts;

11 Violation #2: Conducted business without holding a valid
12 license (RSA 397-A:14,IV(d)) - 2 Counts;

13 (14). Respondent Martin (Unlicensed Mortgage Loan Originator):

14 Violation #1: Transacted business without a valid New
15 Hampshire Mortgage Loan Originator license (RSA 397-
16 A:3,II) - 1 Count;

17 Violation #2: Conducted business without holding a valid
18 license (RSA 397-A:14,IV(d)) - 1 Count;

19 (15). Respondent Kavosi (Unlicensed Mortgage Loan Originator):

20 Violation #1: Transacted business without a valid New
21 Hampshire Mortgage Loan Originator license (RSA 397-
22 A:3,II) - 2 Counts;

23 Violation #2: Conducted business without holding a valid
24 license (RSA 397-A:14,IV(d)) - 2 Counts;

25

1 (16). Respondent De Courcy (Unlicensed Mortgage Loan
2 Originator):

3 Violation #1: Transacted business without a valid New
4 Hampshire Mortgage Loan Originator license (RSA 397-
5 A:3,II) - 1 Count;

6 Violation #2: Conducted business without holding a valid
7 license (RSA 397-A:14,IV(d)) - 1 Count;

8 (17). Respondent Parrino (Unlicensed Mortgage Loan Originator):

9 Violation #1: Transacted business without a valid New
10 Hampshire Mortgage Loan Originator license (RSA 397-
11 A:3,II) - 2 Counts;

12 Violation #2: Conducted business without holding a valid
13 license (RSA 397-A:14,IV(d)) - 2 Counts;

14 (18). Respondent Dalou (Unlicensed Mortgage Loan Originator):

15 Violation #1: Transacted business without a valid New
16 Hampshire Mortgage Loan Originator license (RSA 397-
17 A:3,II) - 1 Count;

18 Violation #2: Conducted business without holding a valid
19 license (RSA 397-A:14,IV(d)) - 1 Count;

20 (19). Respondent Sabeh (Unlicensed Mortgage Loan Originator):

21 Violation #1: Transacted business without a valid New
22 Hampshire Mortgage Loan Originator license (RSA 397-
23 A:3,II) - 2 Counts;

24 Violation #2: Conducted business without holding a valid
25 license (RSA 397-A:14,IV(d)) - 2 Counts;

1 (20). Respondent La (Unlicensed Mortgage Loan Originator):

2 Violation #1: Transacted business without a valid New
3 Hampshire Mortgage Loan Originator license (RSA 397-
4 A:3,II) - 1 Count;

5 Violation #2: Conducted business without holding a valid
6 license (RSA 397-A:14,IV(d)) - 1 Count;

7 (21). Respondent Mallo (Unlicensed Mortgage Loan Originator):

8 Violation #1: Transacted business without a valid New
9 Hampshire Mortgage Loan Originator license (RSA 397-
10 A:3,II) - 4 Counts;

11 Violation #2: Conducted business without holding a valid
12 license (RSA 397-A:14,IV(d)) - 4 Counts;

13 (22). Respondent Molavi (Licensed Mortgage Loan Originator):

14 Violation #1: Transacted business without a valid New
15 Hampshire Mortgage Loan Originator license (RSA 397-
16 A:3,II) - 1 Count;

17 Violation #2: Conducted business without holding a valid
18 license (RSA 397-A:14,IV(d)) - 1 Count;

19 (23). Respondent Biel (Unlicensed Mortgage Loan Originator):

20 Violation #1: Transacted business without a valid New
21 Hampshire Mortgage Loan Originator license (RSA 397-
22 A:3,II) - 1 Count;

23 Violation #2: Conducted business without holding a valid
24 license (RSA 397-A:14,IV(d)) - 1 Count;

25

1 (24). Respondent Benenati (Unlicensed Mortgage Loan Originator):

2 Violation #1: Transacted business without a valid New
3 Hampshire Mortgage Loan Originator license (RSA 397-
4 A:3,II) - 1 Count;

5 Violation #2: Conducted business without holding a valid
6 license (RSA 397-A:14,IV(d)) - 1 Count;

7 (25). Respondent Moss (Unlicensed Mortgage Loan Originator):

8 Violation #1: Transacted business without a valid New
9 Hampshire Mortgage Loan Originator license (RSA 397-
10 A:3,II) - 1 Count;

11 Violation #2: Conducted business without holding a valid
12 license (RSA 397-A:14,IV(d)) - 1 Count;

13 (26). Respondent Chough (Unlicensed Mortgage Loan Originator):

14 Violation #1: Transacted business without a valid New
15 Hampshire Mortgage Loan Originator license (RSA 397-
16 A:3,II) - 2 Counts;

17 Violation #2: Conducted business without holding a valid
18 license (RSA 397-A:14,IV(d)) - 2 Counts;

19 (27). Respondent Colapinto (Unlicensed Mortgage Loan
20 Originator):

21 Violation #1: Transacted business without a valid New
22 Hampshire Mortgage Loan Originator license (RSA 397-
23 A:3,II) - 1 Count;

24 Violation #2: Conducted business without holding a valid
25 license (RSA 397-A:14,IV(d)) - 1 Count;

1 (28). Respondent Sunbol (Unlicensed Mortgage Loan Originator):

2 Violation #1: Transacted business without a valid New
3 Hampshire Mortgage Loan Originator license (RSA 397-
4 A:3,II) - 2 Counts;

5 Violation #2: Conducted business without holding a valid
6 license (RSA 397-A:14,IV(d)) - 2 Counts;

7 (29). Respondent Nelson Nguyen (Unlicensed Mortgage Loan
8 Originator):

9 Violation #1: Transacted business without a valid New
10 Hampshire Mortgage Loan Originator license (RSA 397-
11 A:3,II) - 1 Count;

12 Violation #2: Conducted business without holding a valid
13 license (RSA 397-A:14,IV(d)) - 1 Count;

14 (30). Respondent Mory (Unlicensed Mortgage Loan Originator):

15 Violation #1: Transacted business without a valid New
16 Hampshire Mortgage Loan Originator license (RSA 397-
17 A:3,II) - 1 Count;

18 Violation #2: Conducted business without holding a valid
19 license (RSA 397-A:14,IV(d)) - 1 Count;

20 (31). Respondent Hartnett (Unlicensed Mortgage Loan Originator):

21 Violation #1: Transacted business without a valid New
22 Hampshire Mortgage Loan Originator license (RSA 397-
23 A:3,II) - 1 Count;

24 Violation #2: Conducted business without holding a valid
25 license (RSA 397-A:14,IV(d)) - 1 Count;

1 (32). Respondent Mercado (Unlicensed Mortgage Loan Originator):

2 Violation #1: Transacted business without a valid New
3 Hampshire Mortgage Loan Originator license (RSA 397-
4 A:3,II) - 2 Counts;

5 Violation #2: Conducted business without holding a valid
6 license (RSA 397-A:14,IV(d)) - 2 Counts;

7 (33). Respondent Rodriguez (Unlicensed Mortgage Loan
8 Originator):

9 Violation #1: Transacted business without a valid New
10 Hampshire Mortgage Loan Originator license (RSA 397-
11 A:3,II) - 1 Count;

12 Violation #2: Conducted business without holding a valid
13 license (RSA 397-A:14,IV(d)) - 1 Count;

14 (34). Respondent Curameng (Unlicensed Mortgage Loan Originator):

15 Violation #1: Transacted business without a valid New
16 Hampshire Mortgage Loan Originator license (RSA 397-
17 A:3,II) - 1 Count;

18 Violation #2: Conducted business without holding a valid
19 license (RSA 397-A:14,IV(d)) - 1 Count;

20 (35). Respondent Taylor (Unlicensed Mortgage Loan Originator):

21 Violation #1: Transacted business without a valid New
22 Hampshire Mortgage Loan Originator license (RSA 397-
23 A:3,II) - 1 Count;

24 Violation #2: Conducted business without holding a valid
25 license (RSA 397-A:14,IV(d)) - 1 Count;

1 (36). Respondent Lee (Unlicensed Mortgage Loan Originator):

2 Violation #1: Transacted business without a valid New
3 Hampshire Mortgage Loan Originator license (RSA 397-
4 A:3,II) - 1 Count;

5 Violation #2: Conducted business without holding a valid
6 license (RSA 397-A:14,IV(d)) - 1 Count;

7 (37). Respondent Estrada (Licensed Mortgage Loan Originator):

8 Violation #1: Transacted business without a valid New
9 Hampshire Mortgage Loan Originator license (RSA 397-
10 A:3,II) - 2 Counts;

11 Violation #2: Conducted business without holding a valid
12 license (RSA 397-A:14,IV(d)) - 2 Counts;

13 (38). Respondent Rumi (Licensed Mortgage Loan Originator):

14 Violation #1: Engaged in Act or practice that or course of
15 business which operated as a fraud or deceit (RSA 397-
16 A:2,VI(c)) - 6 Counts;

17 Violation #2: Conducted business without holding a valid
18 license (RSA 397-A:14,IV(d)) - 6 Counts;

19 i. In addition to Paragraph 178h above, the following Respondents
20 shall show cause why a fine in an amount not to exceed \$25,000.00 for each
21 violation or failure to comply with the requirements of the S.A.F.E.
22 Mortgage Licensing Act of 2008 should not be imposed as follows:

23 (1). Respondent Hanley:

24 Violation #1: Failure to be licensed as a Mortgage Loan
25 Originator in accordance with the S.A.F.E. Mortgage

1 Licensing Act of 2008 (RSA 397-A:17,IX) (1 Count);

2 (2). Respondent Johnson:

3 Violation #1: Failure to be licensed as a Mortgage Loan
4 Originator in accordance with the S.A.F.E. Mortgage
5 Licensing Act of 2008 (RSA 397-A:17,IX) (1 Count);

6 (3). Respondent Krol:

7 Violation #1: Failure to be licensed as a Mortgage Loan
8 Originator in accordance with the S.A.F.E. Mortgage
9 Licensing Act of 2008 (RSA 397-A:17,IX) (1 Count);

10 (4). Respondent Kakuuchi:

11 Violation #1: Failure to be licensed as a Mortgage Loan
12 Originator in accordance with the S.A.F.E. Mortgage
13 Licensing Act of 2008 (RSA 397-A:17,IX) (1 Count);

14 (5). Respondent Steiner:

15 Violation #1: Failure to be licensed as a Mortgage Loan
16 Originator in accordance with the S.A.F.E. Mortgage
17 Licensing Act of 2008 (RSA 397-A:17,IX) (1 Count);

18 (6). Respondent Milakovich:

19 Violation #1: Failure to be licensed as a Mortgage Loan
20 Originator in accordance with the S.A.F.E. Mortgage
21 Licensing Act of 2008 (RSA 397-A:17,IX) (1 Count);

22 (7). Respondent Cepeda:

23 Violation #1: Failure to be licensed as a Mortgage Loan
24 Originator in accordance with the S.A.F.E. Mortgage
25 Licensing Act of 2008 (RSA 397-A:17,IX) (1 Count);

1 (8). Respondent Kyle:

2 Violation #1: Failure to be licensed as a Mortgage Loan
3 Originator in accordance with the S.A.F.E. Mortgage
4 Licensing Act of 2008 (RSA 397-A:17,IX) (1 Count);

5 (9). Respondent Powell:

6 Violation #1: Failure to be licensed as a Mortgage Loan
7 Originator in accordance with the S.A.F.E. Mortgage
8 Licensing Act of 2008 (RSA 397-A:17,IX) (1 Count);

9 (10). Respondent Kungl:

10 Violation #1: Failure to be licensed as a Mortgage Loan
11 Originator in accordance with the S.A.F.E. Mortgage
12 Licensing Act of 2008 (RSA 397-A:17,IX) (1 Count);

13 (11). Respondent Martin:

14 Violation #1: Failure to be licensed as a Mortgage Loan
15 Originator in accordance with the S.A.F.E. Mortgage
16 Licensing Act of 2008 (RSA 397-A:17,IX) (1 Count);

17 (12). Respondent Kavosi:

18 Violation #1: Failure to be licensed as a Mortgage Loan
19 Originator in accordance with the S.A.F.E. Mortgage
20 Licensing Act of 2008 (RSA 397-A:17,IX) (1 Count);

21 (13). Respondent De Courcy:

22 Violation #1: Failure to be licensed as a Mortgage Loan
23 Originator in accordance with the S.A.F.E. Mortgage
24 Licensing Act of 2008 (RSA 397-A:17,IX) (1 Count);
25

1 (14). Respondent Parrino:

2 Violation #1: Failure to be licensed as a Mortgage Loan
3 Originator in accordance with the S.A.F.E. Mortgage
4 Licensing Act of 2008 (RSA 397-A:17,IX) (1 Count);

5 (15). Respondent Dalou:

6 Violation #1: Failure to be licensed as a Mortgage Loan
7 Originator in accordance with the S.A.F.E. Mortgage
8 Licensing Act of 2008 (RSA 397-A:17,IX) (1 Count);

9 (16). Respondent SabeH:

10 Violation #1: Failure to be licensed as a Mortgage Loan
11 Originator in accordance with the S.A.F.E. Mortgage
12 Licensing Act of 2008 (RSA 397-A:17,IX) (1 Count);

13 (17). Respondent La:

14 Violation #1: Failure to be licensed as a Mortgage Loan
15 Originator in accordance with the S.A.F.E. Mortgage
16 Licensing Act of 2008 (RSA 397-A:17,IX) (1 Count);

17 (18). Respondent Mallo:

18 Violation #1: Failure to be licensed as a Mortgage Loan
19 Originator in accordance with the S.A.F.E. Mortgage
20 Licensing Act of 2008 (RSA 397-A:17,IX) (1 Count);

21 (19). Respondent Biel:

22 Violation #1: Failure to be licensed as a Mortgage Loan
23 Originator in accordance with the S.A.F.E. Mortgage
24 Licensing Act of 2008 (RSA 397-A:17,IX) (1 Count);

25

1 (20). Respondent Benenati:

2 Violation #1: Failure to be licensed as a Mortgage Loan
3 Originator in accordance with the S.A.F.E. Mortgage
4 Licensing Act of 2008 (RSA 397-A:17,IX) (1 Count);

5 (21). Respondent Moss:

6 Violation #1: Failure to be licensed as a Mortgage Loan
7 Originator in accordance with the S.A.F.E. Mortgage
8 Licensing Act of 2008 (RSA 397-A:17,IX) (1 Count);

9 (26). Respondent Chough:

10 Violation #1: Failure to be licensed as a Mortgage Loan
11 Originator in accordance with the S.A.F.E. Mortgage
12 Licensing Act of 2008 (RSA 397-A:17,IX) (1 Count);

13 (27). Respondent Colapinto:

14 Violation #1: Failure to be licensed as a Mortgage Loan
15 Originator in accordance with the S.A.F.E. Mortgage
16 Licensing Act of 2008 (RSA 397-A:17,IX) (1 Count);

17 (28). Respondent Sunbol:

18 Violation #1: Failure to be licensed as a Mortgage Loan
19 Originator in accordance with the S.A.F.E. Mortgage
20 Licensing Act of 2008 (RSA 397-A:17,IX) (1 Count);

21 (29). Respondent Nelson Nguyen:

22 Violation #1: Failure to be licensed as a Mortgage Loan
23 Originator in accordance with the S.A.F.E. Mortgage
24 Licensing Act of 2008 (RSA 397-A:17,IX) (1 Count);

25

1 (30). Respondent Mory:

2 Violation #1: Failure to be licensed as a Mortgage Loan
3 Originator in accordance with the S.A.F.E. Mortgage
4 Licensing Act of 2008 (RSA 397-A:17,IX) (1 Count);

5 (31). Respondent Hartnett:

6 Violation #1: Failure to be licensed as a Mortgage Loan
7 Originator in accordance with the S.A.F.E. Mortgage
8 Licensing Act of 2008 (RSA 397-A:17,IX) (1 Count);

9 (32). Respondent Mercado:

10 Violation #1: Failure to be licensed as a Mortgage Loan
11 Originator in accordance with the S.A.F.E. Mortgage
12 Licensing Act of 2008 (RSA 397-A:17,IX) (1 Count);

13 (33). Respondent Rodriguez:

14 Violation #1: Failure to be licensed as a Mortgage Loan
15 Originator in accordance with the S.A.F.E. Mortgage
16 Licensing Act of 2008 (RSA 397-A:17,IX) (1 Count);

17 (34). Respondent Curameng:

18 Violation #1: Failure to be licensed as a Mortgage Loan
19 Originator in accordance with the S.A.F.E. Mortgage
20 Licensing Act of 2008 (RSA 397-A:17,IX) (1 Count);

21 (35). Respondent Taylor:

22 Violation #1: Failure to be licensed as a Mortgage Loan
23 Originator in accordance with the S.A.F.E. Mortgage
24 Licensing Act of 2008 (RSA 397-A:17,IX) (1 Count);

25

1 (36). Respondent Lee:

2 Violation #1: Failure to be licensed as a Mortgage Loan
3 Originator in accordance with the S.A.F.E. Mortgage
4 Licensing Act of 2008 (RSA 397-A:17,IX) (1 Count);

5 j. Respondents shall show cause why reimbursement to Consumers 1
6 through 55 as described above should not be made; and

7 k. Nothing in this Order:

8 (1). shall prevent the Department from taking any further
9 administrative and legal action as necessary under New Hampshire law; and

10 (2). shall prevent the New Hampshire Office of the Attorney General
11 from bringing an action against the above named Respondents in any New
12 Hampshire superior court, with or without prior administrative action by the
13 Commissioner.

14 **SO ORDERED.**

15 _____
16 /s/
RONALD A. WILBUR
BANK COMMISSIONER

Dated: 09/28/2011