

In re: Network Capital Funding Corporation, Tri Minh
Nguyen, Helen Lac, Nasim Hashemi, Raymond Jamond Fuller and
Christine Wright,
Respondents

Case No.: 14-165

NOTICE OF ORDER TO SHOW CAUSE FOR LICENSE REVOCATION OF
RESPONDENT NETWORK CAPITAL FUNDING CORPORATION'S
NEW HAMPSHIRE MORTGAGE BANKER LICENSE
("ORDER")

1. This Order commences an adjudicative proceeding under the provisions of RSA Chapter 397-A (including RSA 397-A:17,I through X, RSA 397-A:20,IV, and RSA 397-A:21,I through V) and RSA Chapter 541-A.
2. The Commissioner may issue an order requiring Respondents to show cause why the license should not be revoked or penalties imposed, or both. RSA 397-A:17,I. The Commissioner may impose, against each Respondent, administrative penalties of up to \$2,500.00 for each violation. RSA 397-A:21,II through V.
3. The Commissioner may also order, after notice and opportunity for hearing, an order of rescission, restitution, or disgorgement of profits directed to a person who has violated RSA Chapter 397-A, or a rule

or order thereunder. Rescission, restitution, or disgorgement of profits shall be in addition to any other penalty provided for under RSA Chapter 397-A or RSA 383:10-d. RSA 397-A:17,VIII, RSA 397-A:21,IV and V and RSA 383:10-d.

RESPONDENTS

4. Network Capital Funding Corporation ("Respondent Network Capital") is a corporation formed in the State of Nevada on July 5, 2002 and registered to conduct business in New Hampshire with the New Hampshire Secretary of State on March 16, 2010 with a principal office location in Irvine, California. Network Capital has been licensed with the New Hampshire Banking Department ("Department") as a New Hampshire Mortgage Banker since August 30, 2010. Respondent Network Capital is a Mortgage Banker and a Person. RSA 397-A:1,XII and XVIII.
5. Tri Minh Nguyen ("Respondent Nguyen") is the 100% direct owner, control person and Chief Executive Officer of Respondent Network Capital. Respondent Nguyen is also an active Mortgage Loan Originator in 12 other states. According to Nationwide Mortgage Licensing System & Registry ("NMLS") records, Respondent Nguyen was a licensed New Hampshire

- Mortgage Loan Originator from August 30, 2010 until January 1, 2012. Respondent Nguyen is a Control person (RSA 397-A:1,V-a), a Direct Owner (RSA 397-A:1,VI-a), a Principal (RSA 397-A:1,XIX), a Management Level Employee (RSA 397-A:1,XI-b), a Senior Manager (RSA 397-A:1,XXIII-a), and a Person (RSA 397-A:1,XVIII).
6. Helen Lac ("Respondent Lac") is a Director and control person of Respondent Network Capital. Respondent Lac is a Control person (RSA 397-A:1,V-a), a Principal (RSA 397-A:1,XIX), a Management Level Employee (RSA 397-A:1,XI-b), a Senior Manager (RSA 397-A:1,XXIII-a), and a Person (RSA 397-A:1,XVIII).
 7. Nasim Hashemi ("Respondent Hashemi") is a Director and control person of Respondent Network Capital. Respondent Hashemi is a Control person (RSA 397-A:1,V-a), a Principal (RSA 397-A:1,XIX), a Management Level Employee (RSA 397-A:1,XI-b), a Senior Manager (RSA 397-A:1,XXIII-a), and a Person (RSA 397-A:1,XVIII).
 8. Raymond Jamond Fuller ("Respondent Fuller") is a Director and control person of Respondent Network Capital. Respondent Fuller is a Control person (RSA 397-A:1,V-a), a Principal (RSA 397-A:1,XIX), a Management Level Employee (RSA 397-A:1,XI-b), a Senior

- Manager (RSA 397-A:1,XXIII-a), and a Person (RSA 397-A:1,XVIII).
9. Christine Wright ("Respondent Wright") is a Compliance Officer with Respondent Network Capital. Respondent Wright is a Principal (RSA 397-A:1,XIX), a Management Level Employee (RSA 397-A:1,XI-b), a Senior Manager (RSA 397-A:1,XXIII-a), and a Person (RSA 397-A:1,XVIII).
10. The above-named Respondents are hereinafter collectively known as "Respondents."

RIGHT TO REQUEST A HEARING

11. Respondents each have a right to request a hearing on this Order. "A hearing, if requested shall be scheduled not later than 10 calendar days after the written request for such hearing is received by the commissioner. . . ." RSA 397-A:17, I. If the respondents "fail[] to request a hearing within 30 calendar days of receipt or valid delivery of the order and no hearing is ordered by the commissioner, then such person shall be deemed in default, and the order shall, on the thirty-first day, become permanent, and shall remain in full force and effect until and unless later modified or vacated by the commissioner, for good cause shown." Id.

12. If any person fails to appear at the hearing, such person shall be deemed in default, and the Order shall become permanent, all allegations may be deemed true, and shall remain in full force and effect until modified or vacated by the Commissioner for good cause shown. 541-A:31,V(a) and JUS 810.02.
13. A default may result in revocation, and administrative fines, rescission, disgorgement of profits or restitution as described in Paragraphs 2 and 3 above.

STATEMENT OF ALLEGATIONS

History:

14. On September 28, 2011, the Department issued an Order to Show Cause and Cease and Desist against Respondents Network Capital and Nguyen. The violations included failing to supervise, failing to provide and/or timely provide Good Faith Estimates ("GFEs") by improperly requiring supplemental information before the GFE is given to a consumer (Real Estate Settlement Practices Act violation), and engaging in dishonest or unethical practices.
15. On November 1, 2012, the Department entered into a Consent Order with Respondents Network Capital and Nguyen. In addition to administrative fines and penalties and being ordered to not violate RSA Chapter

397-A and any rules or orders thereunder, Respondent Network Capital's New Hampshire Mortgage Banker license was restricted for 30 days, which meant it could process loans in the pipeline but could not take, process or originate new loan applications. During the 30-day restriction, Respondent Network Capital's compliance officer was to assist Respondents in implementing the terms of the November 1, 2012 Consent Order.

16. The Department conducted an examination of Respondent Network Capital on January 23, 2013 ("2013 Examination") and noted concerns involving:
 - a. Good Faith Estimates;
 - b. Supervision;
 - c. Timely funding; and
 - d. The inaccuracy of place of settlement listed on the HUD-1 Settlement Statements at closings.
17. Respondents assured the Department they would take corrective action of the observations, inter alia, listed in Paragraph 16 above. Respondents failed to take remedial action and failed to properly supervise their employees. Subsequently, the Department observed demonstrated instances of repeated violations in the 2014 examination.

18. The Department commences this Order as a result of the violations found in the February 20, 2014 examination (including repeat violations from the 2013 Examination) and violations of the November 1, 2012 Consent Order.

Failure to Disburse Funds for Residential Mortgage Loans at Closing:

19. At a minimum in New Hampshire, a closing requires the delivery of a deed if the transaction is a conveyance, the signing of a note, and the disbursement of the mortgage loan funds. See RSA 397-A:14-b. The requirement to disburse funds at the closing makes New Hampshire a "wet funding" state. California, on the other hand, is a "dry funding" state, which does not require funding at closing.

20. The Department observed funding violations during the 2013 Examination.

21. Respondent Wright (Compliance Officer) indicated, in response to the 2013 Examination, that it is Respondent Network Capital's policy to push loans to fund out of rescission in New Hampshire. She concurred with the examiner's finding. However, Respondents failed to follow this policy since review of the files indicate that Respondents continued to underwrite loans after closing documents were signed by the

consumer. Further, in most instances, Respondents did not disburse the funds until after the disbursement date listed on the HUD Settlement Statement.

22. During the 2014 examination, the Department again observed funding issues. Specifically, the Department observed late funded residential mortgage loans in five (5) New Hampshire residential mortgage loan files, in violation of RSA 397-A:14-b. The failure to fund at closing resulted in additional interest accruing on the account prior to actual funding.

a. One late-funded residential mortgage loan (Consumer 5) was disbursed one (1) day late but the settlement agent took the day into account and did not charge additional interest; and

b. The remaining four (4) residential mortgage loans require restitution to the following New Hampshire consumers for the accrued interest as follows:

1. Consumer 1: \$151.62;
2. Consumer 2: \$43.35;
3. Consumer 3: \$59.68; and
4. Consumer 4: \$58.21.

23. Therefore, in violation of RSA 397-A:6,I, Respondents failed to supervise their employees not only to a)

ensure the funds were timely disbursed, but also because b) they failed to follow what Respondent Wright indicated in the 2013 Examination was Respondent Network Capital's policy and repeated said violation.

Altering Acknowledgments, Certifications and Tax Documents

Post-Consumer Signature:

24. Respondents had New Hampshire consumer borrowers sign Undisclosed Debt Acknowledgments, HUD documents, and 4506-T Tax forms.
25. In the current 2014 examination, the Department examiner observed that Respondents altered these forms by adding additional information or inquiries after the forms were signed by the consumers. The alterations were mostly made electronically.
26. Respondent Wright indicated that after researching the issues raised by the 2014 examination, she indicated Respondent Network Capital a) does not require any consumer to sign a blank document and b) as to the documents that were electronically altered after execution, Respondents cannot determined who altered the document or when the document was altered. Respondent Wright further stated that Respondent Network Capital has always had a Zero Tolerance Loan

Fraud Policy given to each new employee to read, digest and sign. Respondent Wright then indicated they have created an amendment to Respondent Network Capital's policy that specifically addresses the Department's concerns and will be distributed to all current and future employees.

27. Undisclosed Debt Acknowledgment ("Acknowledgment"):

The Acknowledgment was altered in the following files:

- a. Consumer 1 file: The electronic file of the December 26, 2013 signed Acknowledgment included blanks in the Explanation of Inquiry; yet the same document maintained in the Consumer 1 loan file was altered to include the words "This transaction."
- b. Consumer 4 file: The electronic file of the December 23, 2013 signed Acknowledgment included the additional term of "shopping for refi," which was added on January 16, 2014, after the consumer executed the Acknowledgment.
- c. Consumer 5 file: The electronic file of the February 18, 2014 signed Acknowledgment included the additional term of "shopping for refinance," which was added on February 19, 2014, after the consumer executed the Acknowledgment.

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- d. Consumer 9 file: The electronic file of the April 12, 2013 signed Acknowledgment included the additional terms of "This refi", "Shopping rate", "Shopping Rates" and "Shopping," which were added sometime around June 24, 2013, after the consumer executed the Acknowledgment.
28. Affiliate Fee Loan Level Certification ("Certification"): The Certification was altered in the following files:
- a. Consumer 7 file: The Certification was signed by Respondent Nguyen on January 30, 2014. However, screenshots indicate the date of Respondent's signature was changed to March 12, 2014 sometime between March 12, 2014 and May 23, 2014. The loan number was also added to the file after Respondent Nguyen signed the Certification.
 - b. Consumer 8 file: The Certification was signed by Respondent Nguyen on January 30, 2014. However, screenshots indicate the date of Respondent's signature was changed to February 20, 2014 sometime between February 20, 2014 and May 28, 2014. The loan number was also added to the file after Respondent Nguyen signed the Certification.

29. Verbal Verification of Employment ("Verification"):
The Verification signature date for Consumer 9 appears to be whited-out and replaced electronically with the date of June 24, 2013.
30. Respondents have demonstrated a pattern and practice of altering documents after the consumers have executed these documents. Therefore, in violation of RSA 397-A:6,I, Respondents failed to supervise their employees not only to a) ensure the documents were not altered, but also because b) they failed to follow what Respondent Wright indicated in the current 2014 examination was Respondent Network Capital's policy.

Late-filed Good Faith Estimates/Change of Circumstance

Violations:

Good Faith Estimates:

31. Pursuant to RSA 397-A:16,I, Respondents are required to provide a Good Faith Estimate ("GFE") to a consumer within three (3) business days of receipt of the loan application.
32. Respondents Network Capital and Nguyen were fined in the 2012 Consent Order for untimely submitted GFEs. See Paragraph 18(f) of the 2012 Consent Order. Further, the Department examiner also observed the violation in the 2013 Examination.

33. In the Consumer 10 file, the consumer had communicated sufficient information to receive the initial GFE in order to decide if Consumer 10 would intend to continue with the loan application process. The application and credit report were dated May 6, 2013. An Adverse Action Notice indicating a credit application was incomplete was dated May 9, 2013. However, no information in the file exists to demonstrate a GFE was given to Consumer 10.
34. Consumer 11's application and credit report were completed on January 28, 2014. On February 3, 2014, Respondents sent Consumer 11 an Adverse Action Notice indicating the credit application was incomplete. The file contained an initial GFE dated February 1, 2014, which is beyond the three (3) day requirement.

Change of Circumstances:

35. Pursuant to the Real Estate Settlement Procedures Act, 12 C.F.R. §1024.2(b), 1024.7(f)(1) and (2), a change of circumstances sufficient to trigger a new GFE includes any inaccurate information on the initial GFE. Additional fees (if out of tolerance by 10%) also trigger a need for a revised GFE.
- a. In the Consumer 2 loan file, Consumer 2 was given re-disclosures of the GFE on October 1, 2013,

October 4, 2013, October 7, 2013, October 10, 2013 and October 16, 2013.

- i. Respondent Wright indicated in the 2014 examination that the October 7, 2013 GFE was to increase the loan amount and origination fees. She indicated the October 10, 2013 disclosure was to lower the loan amount and decrease the origination fee. She was not sure why the October 16, 2013 GFE was issued except to fix the important dates section but the fees and charges did not change the initial October 1, 2013 GFE.
 - ii. The issue herein is that the initial GFE did not include property taxes. The October 4, 2013 added \$2,440 in property taxes and the October 7, 2013, October 10, 2013 and October 16, 2013 GFEs excluded the property taxes. Yet, Consumer 2 was charged \$2440 in property taxes on the HUD.
- b. In the Consumer 4 file, Respondents issued the original GFE on November 29, 2013. A revised GFE issued on February 11, 2014 due to a rate lock. However, the title fee increased by \$50 on the revised GFE. Respondent Wright indicated the

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title service fee should not have increased but it happens sometimes. Respondent Wright further indicated that Respondent Network Capital's policy is that all final HUD-1s are audited against the GFEs and if any loan is outside of the allowable tolerances, the consumer is issued a refund.

36. Respondents violated RSA 397-A:16,I by failing to provide the GFE within three (3) business days to Consumers 10 and 11.
37. Respondents violated RSA 397-:14,IV(f) by violating Paragraph 18(f) of the Consent Order regarding untimely issued GFEs.
38. Respondents violated RSA 397-A:6,I by failing to supervise their employees to ensure a) GFEs were timely issued, b) change of circumstances triggering revised GFE were required and c) disclosures were given to consumers for fees charged on the HUD-1 Settlement Statement.

Inaccurate Place of Settlement Listed on the HUD-1 Settlement Statements:

39. Pursuant to Regulation X, 12 C.F.R. §1024.8 and Appendix of the Real Estate Settlement Procedures Act, Section H requires a place of settlement.

40. In the 2013 Examination, Respondent Wright sent an email to the settlement agent requesting that all HUD-1s prepared on closings in New Hampshire reflect the actual place of settlement not the settlement agent's address. Respondent Wright had concurred with the Department examiner's findings regarding this violation and indicated the funders had been instructed to look for this item prior to the completion of the HUD-1.

41. The HUD-1 Settlement Statements for Consumers 1, 2, 3, 4, 5, 6, 7, 8 and 9 all included the wrong place of settlement.

42. Respondents violated RSA 397-A:6,I by failing to supervise their employees to ensure the HUD-1 settlement statements included the correct place of settlement.

Inaccurate HUD-1 Settlement Statements at Closing:

43. Respondents allowed two conflicting and inaccurate HUD-1 Settlement Statements to be maintained in the files of four (4) New Hampshire consumers.

a. Consumer 1 file: Consumer 1 signed two conflicting HUDs at closing. The charges appeared on different lines of the documents and while the appraiser was listed on one, the term "need

invoice" was listed on the other. Both HUDs also overcharged interest in the Daily Interest Charges.

- b. Consumer 3 file: The HUD signed at closing excluded charges for the specific interest rate chosen nor any initial deposit for the escrow account. The net payoff listed \$6,598.90. The one produced after closing includes a net payoff of only \$2,438.57. Both HUDs also overcharged interest in the Daily Interest Charges.
- c. Consumer 6 file: The consumer signed two conflicting HUDs at closing. Respondent Wright indicated that in this instance, while Respondent Network Capital prepares a HUD for closing and sends to escrow, title must have sent both. She explained the fees are different because Respondents initially had one closing agent and later switched to another company. Both HUDs overcharged interest in the Daily Interest Charges.
- d. Consumer 8 file: The consumer signed two conflicting HUDs at closing but neither one matched the HUD produced after disbursement. Respondent Wright again explained that title must

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have mistakenly sent both HUDs to escrow.

44. Respondents made false or deceptive statements or representations with the regard to the rates, points, or other financing terms or conditions for the residential mortgage loans listed in Paragraph 43 above, in violation of RSA 397-A:14,IV(g).
45. Respondents violated RSA 397-A:6,I by failing to supervise their employees to ensure only one accurate HUD was signed by the consumer with the correct amount of charges, fees and interest.

Financial Statements Required to be Filed Within 90 Days

After Fiscal Year End:

46. Respondents are required to produce financial statements in accordance with generally accepted account principles ("GAAP") with appropriate note disclosures. These financial statements should include a balance sheet, income statement, statement of changes in owners' equity and a cash flow statement. Such documentation was required to be filed by March 31 of the subsequent year. Respondents did not produce all such documentation until May 1, 2014, in violation of RSA 397-A:13,II. At a statutory fee of \$25.00 per day with a maximum fine of \$2,500.00, Respondents owe a statutory fine of \$775.

47. The 2012 auditor found the 2012 financial statement did not meet GAAP standards. The 2012 financial statement was not produced to the Department until April 18, 2013, well after the 2013 Examination. The auditor concluded that "[m]anagement did not maintain effective operation of internal control over the application of accounting principles generally accepted in the United States of America, resulting in material adjustments to the Company's preliminary financial statements. Specifically, the Company did not account for guarantees (repurchase reserves) and derivative financial instruments (rate lock commitments). In addition, the Company did not perform appropriate analyses and reconciliations for (a) unrealized gains for mortgage loans held for sale subject to fair value option, (b) restricted cash, (c) warehouse borrowings, (d) deferred rent, (e) premises and equipment, (f) distributions to stockholder, and (g) compliance with debt covenants."
48. As part of the application process, Respondents are required to submit detailed financial information sufficient for the commissioner to determine Respondent Network Capital's ability to conduct the business of a mortgage banker with financial

- integrity. See RSA 397-A:5,III(c). The commissioner must then make a determination that the applicant's financial resources, experience, personnel, and record of past or proposed conduct warrant the public's confidence and the issuance of a license. See RSA 397-A:5,V(a).
49. Respondents are under a continuing obligation to update information on file with the commissioner. If any information filed with the commissioner becomes materially inaccurate, Respondents are required to promptly submit to the commissioner an amendment to its application records that will correct the information on file with the commissioner. See RSA 397-A:10,IV.
50. In violation of RSA 397-A:6,I, Respondents have failed to supervise their employees in insuring documents are not only timely filed but properly prepared in accordance with GAAP standards.
51. Respondents have failed to conduct business in such a manner as to maintain financial integrity and to warrant the public's confidence in maintenance of this license. The commissioner may by order, upon due notice and opportunity for hearing, inter alia, revoke

a license and bar any person from licensure. See RSA 397-A:17, I(j).

Advertising Violations:

52. Respondents run radio advertisements wherein they state Respondent Network Capital's average timeframe from phone call to funding a mortgage loan is 7 to 10 days. In fact, of the 232 loans closed between January 2, 2014 and February 24, 2014, less than 1% closed in 7 to 10 days.
53. When questioned about the advertising statement, Respondent Wright indicated the 7 to 10 days statement did not begin until 2014 and it was business days. She indicated the advertisements would change to include "business." However, of the same 232 loans closed between January 2, 2014 and February 24, 2014, only 25% closed in 7 to 10 business days.
54. Respondent Network Capital's Advertising Approval Policy dated January 14, 2014 states that it is a violation of law and regulation to advertise in a manner that puts forward incomplete, inaccurate information or information that deceives the public. Further, the Policy also stated that all Network Capital Funding Corporation advertisements would be reviewed by the Chief Compliance Officer and/or

- General Counsel and Executive Management and receive written approval prior to release to the public.
55. Respondents violated RSA 397-A:6,I by failing to properly supervise all advertisements to the public.
56. In violation of RSA 397-A:14,IV(n), Respondents engaged in deceptive advertising practices by promising deceptive closing timeframes.

Failure to Safeguard NonPublic Consumer Information:

57. While onsite for the 2014 examination, the Department examiner observed nonpublic consumer information left on the reception desk without being secured and without an employee in the reception area. This was also an observation in the 2013 Examination.
58. Respondents violated RSA 397-A:6,I by failing to supervise its employees to secure nonpublic consumer information.

Public Confidence:

59. Based on the significant above mentioned violations, Respondents have failed to conduct business in such a manner as to maintain financial integrity and to warrant the public's confidence in maintenance of this license. See RSA 397-A:17,I(j).

61. **Accordingly, it is hereby ORDERED that:**

- a. Pursuant to RSA 397-A:17,(I)(j), Respondents are not qualified on the basis of such factors as experience, knowledge, and financial integrity;
- b. Respondents shall show cause why Respondent Network Capital's New Hampshire Mortgage Banker license should not be revoked;
- c. Respondents shall show cause why an administrative fine of up to a maximum of \$2,500.00 per violation (as stated in Violations below) should not be imposed as follows:

(1). Respondent Network Capital Funding Corporation:

#1: Failure to Fund Residential Mortgage Loans at Closing (RSA 397-A:14-b) -

5 Violations;

#2: Failure to Supervise Employees (RSA 397-A:6,I) - 9 Violations;

#3: Failure to timely provide Good Faith Estimates (RSA 397-A:16,I) - 2 Violations;

#4: Violation of the Consent Order (RSA 397-A:14,IV(f)) - 2 Violations;

#5: Creation of false or deceptive HUDs (RSA 397-A:14,IV(g)) - 1 Violation;

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#6: Failure to timely file a complete financial statement (RSA 397-A:13,II) - 1 Violation;

#7: Engaging in deceptive advertising (RSA 397-A:14,IV(n)) - 1 Violation;

(2). Respondent Tri Minh Nguyen (as Control Person, Direct Owner, Principal, Management Level Employee and Senior Manager):

#1: Failure to Fund Residential Mortgage Loans at Closing (RSA 397-A:14-b) - 5 Violations;

#2: Failure to Supervise Employees (RSA 397-A:6,I) - 9 Violations;

#3: Failure to timely provide Good Faith Estimates (RSA 397-A:16,I) - 2 Violations;

#4: Violation of the Consent Order (RSA 397-A:14,IV(f)) - 2 Violations;

#5: Creation of false or deceptive HUDs (RSA 397-A:14,IV(g)) - 1 Violation;

#7: Engaging in deceptive advertising (RSA 397-A:14,IV(n)) - 1 Violation;

(3). Respondent Helen Lac (as Control Person, Principal, Management Level Employee and Senior Manager):

#1: Failure to Fund Residential Mortgage Loans at Closing (RSA 397-A:14-b) -

5 Violations;

#2: Failure to Supervise Employees (RSA 397-A:6,I) - 9 Violations;

#3: Failure to timely provide Good Faith Estimates (RSA 397-A:16,I) - 2 Violations;

#4: Violation of the Consent Order (RSA 397-A:14,IV(f)) - 2 Violations;

#5: Creation of false or deceptive HUDs (RSA 397-A:14,IV(g) - 1 Violation;

#7: Engaging in deceptive advertising (RSA 397-A:14,IV(n)) - 1 Violation;

(4). Respondent Nasim Hashemi (as Control Person, Principal, Management Level Employee and Senior Manager):

#1: Failure to Fund Residential Mortgage Loans at Closing (RSA 397-A:14-b) -

5 Violations;

#2: Failure to Supervise Employees (RSA 397-A:6,I) - 9 Violations;

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#3: Failure to timely provide Good Faith Estimates (RSA 397-A:16,I) - 2 Violations;

#4: Violation of the Consent Order (RSA 397-A:14,IV(f)) - 2 Violations;

#5: Creation of false or deceptive HUDs (RSA 397-A:14,IV(g) - 1 Violation;

#7: Engaging in deceptive advertising (RSA 397-A:14,IV(n)) - 1 Violation;

(5). Respondent Raymond Jamond Fuller (as Control Person, Principal, Management Level Employee and Senior Manager):

#1: Failure to Fund Residential Mortgage Loans at Closing (RSA 397-A:14-b) - 5 Violations;

#2: Failure to Supervise Employees (RSA 397-A:6,I) - 9 Violations;

#3: Failure to timely provide Good Faith Estimates (RSA 397-A:16,I) - 2 Violations;

#4: Violation of the Consent Order (RSA 397-A:14,IV(f)) - 2 Violations;

#5: Creation of false or deceptive HUDs (RSA 397-A:14,IV(g) - 1 Violation;

#7: Engaging in deceptive advertising (RSA 397-A:14,IV(n)) - 1 Violation;

(6). Respondent Christine Wright (as Principal, Management Level Employee and Senior Manager):

#1: Failure to Fund Residential Mortgage Loans at Closing (RSA 397-A:14-b) -

5 Violations;

#2: Failure to Supervise Employees (RSA 397-A:6,I) - 9 Violations;

#3: Failure to timely provide Good Faith Estimates (RSA 397-A:16,I) - 2 Violations;

#4: Violation of the Consent Order (RSA 397-A:14,IV(f)) - 2 Violations;

#5: Creation of false or deceptive HUDs (RSA 397-A:14,IV(g) - 1 Violation;

#7: Engaging in deceptive advertising (RSA 397-A:14,IV(n)) - 1 Violation;

f. Respondents shall show cause why restitution to the following consumers should not be imposed:

(1). Consumer 1: \$151.62;

(2). Consumer 2: \$2,483.85;

(3). Consumer 3: \$59.68;

(4). Consumer 4: \$108.21;

g. Respondents shall show cause why Respondents should not be imposed a \$775.00 statutory fine

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