

**BEFORE THE ADMINISTRATOR OF CONSUMER CREDIT
STATE OF OKLAHOMA**

STATE OF OKLAHOMA,)
ex rel, DEPARTMENT OF)
CONSUMER CREDIT)
)
Petitioner)
)
v.) Case No. 12-0026-DIS
)
PHILIAMENIA EPLEY)
)
Respondent)



NOTICE OF HEARING

The State of Oklahoma, ex rel., Department of Consumer Credit, alleges and states as follows:

JURISDICTION, AUTHORITY AND REQUIREMENTS

The Administrator of Consumer Credit (Administrator) has administrative authority to administer, interpret and enforce the Oklahoma Secure and Fair Enforcement for Mortgage Licensing Act, 59 O.S. §§ 2095 et seq., (SAFE Act). 59 O.S. § 2095.1 (2).

Penalties

1. In order to ensure the effective supervision and enforcement of the SAFE Act, the Administrator may, after notice and hearing pursuant to Article II of the Administrative Procedures Act, 75 O.S. §§ 308a et seq., impose any or any combination of the following penalties:

(a) deny, suspend, revoke, censure, place on probation or decline to renew a license issued pursuant to the SAFE Act for a violation of the SAFE Act, any rules promulgated pursuant to the SAFE Act and any order of the Administrator issued pursuant to the SAFE Act;

(b) deny, suspend, revoke, censure, place on probation or decline to renew a license if an applicant or licensee fails at any time to meet the requirements of the SAFE Act or withholds information or makes a material misstatement in an application for a license or renewal of a license;

(c) order restitution against entities or individuals subject to the SAFE Act for violations of the SAFE Act or

(d) issue orders or directives under the SAFE Act as follows:

(i) order or direct entities or individuals subject to the SAFE Act to cease and desist from conducting business, including immediate temporary orders to cease and desist;

(ii) order or direct entities or individuals subject to the SAFE Act to cease any harmful activities or violations of the SAFE Act, including immediate temporary orders to cease and desist;

(iii) enter immediate temporary orders to cease business under a license issued pursuant to the authority of the SAFE Act if the Administrator determines that such license was erroneously granted or the licensee is currently in violation of the SAFE Act;

(iv) order or direct such other affirmative action as the Administrator deems necessary, or

(v) impose a civil penalty of not less than One Hundred Dollars (\$100.00) nor more than Two Thousand Five Hundred Dollars (\$2,500.00) for each violation of the SAFE Act against a licensee or any other entity or individual subject to the SAFE Act, not to exceed Five Thousand Dollars (\$5,000.00 for all violations resulting from a single incident or transaction. 59 O.S. § 2095.17.

Appointment of independent hearing examiner

1. The Administrator shall appoint an independent hearing examiner to conduct all administrative hearings involving alleged violations of the SAFE Act. The independent hearing examiner shall have authority to exercise all powers granted by Article II of the Administrative Procedures Act in conducting hearings.

2. The independent hearing examiner shall have authority to recommend penalties authorized by the SAFE Act and issue proposed orders, with proposed findings of fact and proposed conclusions of law, to the Administrator pursuant to Article II

of the Administrative Procedures Act. The Administrator shall review the proposed order and issue a final agency order in accordance with Article II of the Administrative Procedures Act. 59 O.S. § 2095.17(D).

Hearing costs

Hearing costs may be assessed by the hearing examiner against the Respondent, unless the Respondent is the prevailing party.

Appeals

A final agency order issued by the Administrator shall be appealable by all parties to an Oklahoma district court as provided by Article II of the Administrative Procedures Act.

Requirements for individual proceedings at the Department of Consumer Credit

The Respondent is responsible for reviewing the administrative rules regarding procedures and requirements for references of parties, entries of appearances, continuances, subpoenas and Consent Orders for individual proceedings at the Department of Consumer Credit. The administrative rules regarding individual proceedings at the Department of Consumer Credit are located at OKLA. ADMIN. CODE § 160:3-1-4. A copy of the individual proceeding rules has been attached to this Notice of Hearing for reference.

Consent Order

The Respondent may waive the right to a hearing and enter into a Consent Order regarding this matter. The Respondent shall submit notification in writing to the attorney for the Department via electronic mail or regular United States mail indicating that the Respondent wishes to waive the right to a hearing in this matter at least five (5) calendar days prior to the scheduled hearing date.

Reporting of violations and enforcement actions

The Administrator is required to regularly report violations of the SAFE Act as well as enforcement actions and other relevant information to the Nationwide Mortgage Licensing System and Registry (NMLS). 59 O.S. § 2095.25. Final agency

orders and Consent Orders are public records included in (NMLS) for access by the public.

Enforcement of administrative order

Any administrative order or settlement agreement imposing a civil penalty pursuant to the SAFE Act may be enforced in the same manner as civil judgments in the State of Oklahoma. The Administrator may file an application to enforce an administrative order or settlement agreement imposing a civil penalty in the district court of Oklahoma County. 59 O.S. § 2095.17(C).

ALLEGATIONS OF FACT

1. The licensing system of record for mortgage brokers and mortgage loan originators in the State of Oklahoma is NMLS.

2. The Respondent is a licensed mortgage loan originator pursuant to the SAFE Act with the following licensing information indicated by NMLS:

(a) Oklahoma license number MLO06169;

(b) NMLS unique identifier number 211139;

(c) Mailing address of record at P.O. Box 144, Eufaula, Oklahoma 74432;

(d) Qualifying individual and control person for EFC Mortgage, LLC.

3. The Respondent is the loan originator designated by EFC Mortgage, LLC to oversee the operations of the principal place of business of EFC Mortgage, LLC, formerly known as Family Security, the Home Loan Place (EFC Mortgage).

4. The Petitioner conducted an examination of the books and records of EFC Mortgage dated September 8, 2011 and completed February 29, 2012 as indicated by the Petitioner's Chief Examiner, Mary Keel.

5. Unless the allegations indicate otherwise, the Petitioner's examination of EFC Mortgage dated September 8, 2011 and completed February 29, 2012 includes the following information:

(a) EFC Mortgage received a residential mortgage loan application from Jackie Ann Stanfill dated October 28, 2010. The loan originator listed on the residential mortgage loan application is Zachary Bennett with a loan originator identifier number of 237626. There is a signature on the loan application purporting to be the signature of Zachary Bennett. The Respondent's address is listed as 7715 E 111 Street, Suite 106, Tulsa, Oklahoma 74133.

(i) An affidavit signed by Zachary Bennett on January 18, 2012 states that Zachary Bennett reviewed the loan file of Jackie Ann Stanfill, states that Zachary Bennett did not take the loan application of Jackie Ann Stanfill, states that Zachary Bennett did not offer or negotiate any terms of a residential mortgage loan for Jackie Ann Stanfill, states that the signature of Zachary Bennett on the loan application is not Zachary Bennett's signature and further states that Zachary Bennett did not have any contact with Jackie Ann Stanfill regarding the loan application.

(b) EFC Mortgage received a residential mortgage loan application from Jacob H. De Souza dated November 18, 2010. The loan originator listed on the residential mortgage loan application is Menia Epley with a loan originator identifier number of 02330. There is a signature on the loan application purporting to be the signature of Menia Epley. The Respondent's address is listed as 7715 E 111 Street, Suite 106, Tulsa, Oklahoma 74133.

(i) An affidavit signed by Philiamenia Epley on January 20, 2012 states that Philiamenia Epley reviewed the loan file of Jacob H. De Souza, states that Philiamenia Epley did not take the loan application of Jacob H. De Souza, states that Philiamenia Epley did not offer or negotiate any terms of a residential mortgage loan for Jacob H. De Souza, states that the signature of Menia Epley on the loan application is not Philiamenia Epley's signature and further states that Philiamenia Epley did not have any contact with Jacob H. De Souza regarding the loan application.

(c) EFC Mortgage received a residential mortgage loan application from Misty J. Kilburn dated December 2, 2010. The loan originator listed on the residential mortgage loan application is Menia Epley with a loan originator identifier number of 02330. There is a signature on the loan application

purporting to be the signature of Menia Epley. The Respondent's address is listed as 7715 E 111 Street, Suite 106, Tulsa, Oklahoma 74133.

(i) An affidavit signed by Philiamenia Epley on January 20, 2012 states that Philiamenia Epley reviewed the loan file of Misty J. Kilburn, states that Philiamenia Epley did not take the loan application of Misty J. Kilburn, states that Philiamenia Epley did not offer or negotiate any terms of a residential mortgage loan for Misty J. Kilburn, states that the signature of Menia Epley on the loan application is not Philiamenia Epley's signature and further states that Philiamenia Epley did not have any contact with Misty J. Kilburn regarding the loan application.

(d) EFC Mortgage received a residential mortgage loan application from Cynthia D. Clark dated December 2, 2010. The loan originator listed on the residential mortgage loan application is Zac Bennett with a loan originator identifier number of 237626. There is a signature on the loan application purporting to be the signature of Zac Bennett. The Respondent's address is listed as 7715 E 111 Street, Suite 106, Tulsa, Oklahoma 74133.

(i) An affidavit signed by Zachary Bennett on January 18, 2012 states that Zachary Bennett reviewed the loan file of Cynthia D. Clark, states that Zachary Bennett did not take the loan application of Cynthia D. Clark, states that Zachary Bennett did not offer or negotiate any terms of a residential mortgage loan for Cynthia D. Clark, states that the signature of Zachary Bennett on the loan application is not Zachary Bennett's signature and further states that Zachary Bennett did not have any contact with Cynthia D. Clark regarding the loan application.

(ii) An affidavit signed by Becky Mullings on January 25, 2012 states that the signature of Zachary Bennett or Zac Bennett on the loan application of Cynthia D. Clark is her signature. The affidavit signed by Becky Mullings on January 25, 2012 further states that Richard Louis Fleege II directed her to sign Zachary Bennett's name on the loan application of Cynthia D. Clark.

(iii) According to the job description and compensation plan of Richard Louis Fleege II with the Respondent, Richard Louis Fleege II was the Manager of Network

Developing and Quality Control for the Respondent at the Cynthia D. Clark's loan application was received.

(e) EFC Mortgage received a residential mortgage loan application from Sidney L. Kleindienst dated December 7, 2010. The loan originator listed on the residential mortgage loan application is Zac Bennett with a loan originator identifier number of 237626. There is a signature on the loan application purporting to be the signature of Zac Bennett. The Respondent's address is listed as 7715 E 111 Street, Suite 106, Tulsa, Oklahoma 74133.

(i) An affidavit signed by Zachary Bennett on January 18, 2012 states that Zachary Bennett reviewed the loan file of Sidney L. Kleindienst, states that Zachary Bennett did not take the loan application of Sidney L. Kleindienst, states that Zachary Bennett did not offer or negotiate any terms of a residential mortgage loan for Sidney L. Kleindienst, states that the signature of Zachary Bennett on the loan application is not Zachary Bennett's signature and further states that Zachary Bennett did not have any contact with Sidney L. Kleindienst regarding the loan application.

(f) EFC Mortgage received a residential mortgage loan application from Jason V. Fuller dated December 16, 2010. The loan originator listed on the residential mortgage loan application is Menia Epley with a loan originator identifier number of 02330. There is a signature on the loan application purporting to be the signature of Menia Epley. The Respondent's address is listed as 7715 E 111 Street, Suite 106, Tulsa, Oklahoma 74133.

(i) An affidavit signed by Philiamenia Epley on January 20, 2012 states that Philiamenia Epley reviewed the loan file of Jason V. Fuller, states that Philiamenia Epley did not take the loan application of Jason V. Fuller, states that Philiamenia Epley did not offer or negotiate any terms of a residential mortgage loan for Jason V. Fuller, states that the signature of Menia Epley on the loan application is not Philiamenia Epley's signature and further states that Philiamenia Epley did not have any contact with Jason V. Fuller regarding the loan application.

(g) EFC Mortgage received a residential mortgage loan application from Lola M. Hood dated January 3, 2011. The loan originator listed on the residential mortgage loan application

is Zac Bennett with a loan originator identifier number of 237626. The Respondent's address is listed as 123 W. Commercial Street, Broken Arrow, Oklahoma 74012.

(i) An affidavit signed by Zachary Bennett on January 18, 2012 states that Zachary Bennett reviewed the loan file of Lola M. Hood, states that Zachary Bennett did not take the loan application of Lola M. Hood, states that Zachary Bennett did not offer or negotiate any terms of a residential mortgage loan for Lola M. Hood and further states that Zachary Bennett did not have any contact with Lola M. Hood regarding the loan application.

(ii) The address of record for the Respondent on January 3, 2011 was 7715 E. 111th Street, Suite 106, Tulsa, Oklahoma 74133.

(iii) The Respondent was not licensed to transact business as a mortgage broker at 123 W. Commercial Street, Broken Arrow, Oklahoma 74012 on January 3, 2011.

(h) EFC Mortgage received a residential mortgage loan application from Wesley S. Wood dated January 5, 2011. The loan originator listed on the residential mortgage loan application is Menia Epley with a loan originator identifier number of 02330. The Respondent's address is listed as 7715 E 111 Street, Suite 106, Tulsa, Oklahoma 74133.

(i) An affidavit signed by Philiamenia Epley on January 20, 2012 states that Philiamenia Epley reviewed the loan file of Wesley S. Wood, states that Philiamenia Epley did not take the loan application of Wesley S. Wood, states that Philiamenia Epley did not offer or negotiate any terms of a residential mortgage loan for Wesley S. Wood, states that the signature of Menia Epley on the loan application is not Philiamenia Epley's signature and further states that Philiamenia Epley did not have any contact with Wesley S. Wood regarding the loan application.

(i) EFC Mortgage received a residential mortgage loan application from Sonya R. Kuykendall and Darrell W. Kuykendall dated January 10, 2011. The loan originator listed on the residential mortgage loan application is Zac Bennett with a loan originator identifier number of 237626. The Respondent's address is listed as 7715 E 111 Street, Suite 106, Tulsa, Oklahoma 74133.

(i) An affidavit signed by Zachary Bennett on January 18, 2012 states that Zachary Bennett reviewed the loan file of Sonya R. Kuykendall and Darrell W. Kuykendall, states that Zachary Bennett did not take the loan application of Sonya R. Kuykendall and Darrell W. Kuykendall, states that Zachary Bennett did not offer or negotiate any terms of a residential mortgage loan for Sonya R. Kuykendall and Darrell W. Kuykendall, states that the signature of Zac Bennett on the loan application is not Zachary Bennett's signature and further states that Zachary Bennett did not have any contact with Sonya R. Kuykendall and Darrell W. Kuykendall regarding the loan application.

(j) EFC Mortgage received a residential mortgage loan application from Shelia M. Dority dated January 10, 2011. The loan originator listed on the residential mortgage loan application is Zac Bennett with a loan originator identifier number of 237626. The Respondent's address is listed as 123 W. Commercial St., Broken Arrow, OK 74012.

(i) An affidavit signed by Zachary Bennett on January 18, 2012 states that Zachary Bennett reviewed the loan file of Shelia M. Dority, states that Zachary Bennett did not take the loan application of Shelia M. Dority, states that Zachary Bennett did not offer or negotiate any terms of a residential mortgage loan for Shelia M. Dority and further states that Zachary Bennett did not have any contact with Shelia M. Dority regarding the loan application.

(ii) The address of record for the Respondent on January 10, 2011 was 7715 E. 111th Street, Suite 106, Tulsa, Oklahoma 74133.

(iii) The Respondent was not licensed to transact business as a mortgage broker at 123 W. Commercial Street, Broken Arrow, Oklahoma 74012 on January 10, 2011.

(k) EFC Mortgage received a residential mortgage loan application from Tyler D. Meier dated January 21, 2011. The loan originator listed on the residential mortgage loan application is Zac Bennett with a loan originator identifier number of 237626. The Respondent's address is listed as 7715 E 111 Street, Suite 106, Tulsa, Oklahoma 74133.

(i) An affidavit signed by Zachary Bennett on

January 18, 2012 states that Zachary Bennett reviewed the loan file of Tyler D. Meier, states that Zachary Bennett did not take the loan application of Tyler D. Meier, states that Zachary Bennett did not offer or negotiate any terms of a residential mortgage loan for Tyler D. Meier, states that the signature of Zac Bennett on the loan application is not Zachary Bennett's signature and further states that Zachary Bennett did not have any contact with Tyler D. Meier regarding the loan application.

(l) EFC Mortgage received a residential mortgage loan application from Letha LaDean Vincent dated January 27, 2011. The loan originator listed on the residential mortgage loan application is Zac Bennett with a loan originator identifier number of 237626. The Respondent's address is listed as 7715 E 111 Street, Suite 106, Tulsa, Oklahoma 74133.

(i) An affidavit signed by Zachary Bennett on January 18, 2012 states that Zachary Bennett reviewed the loan file of Letha LaDean Vincent, states that Zachary Bennett did not take the loan application of Letha LaDean Vincent, states that Zachary Bennett did not offer or negotiate any terms of a residential mortgage loan for Letha LaDean Vincent, states that the signature of Zac Bennett on the loan application is not Zachary Bennett's signature and further states that Zachary Bennett did not have any contact with Letha LaDean Vincent regarding the loan application.

(m) EFC Mortgage received a residential mortgage loan application from Cassandra Leah Kirk dated January 31, 2011. The loan originator listed on the residential mortgage loan application is Zachary Bennett with a loan originator identifier number of 237626. The Respondent's address is listed as 7715 E 111 Street, Suite 106, Tulsa, Oklahoma 74133.

(i) An affidavit signed by Zachary Bennett on January 18, 2012 states that Zachary Bennett reviewed the loan file of Cassandra Leah Kirk, states that Zachary Bennett did not take the loan application of Cassandra Leah Kirk, states that Zachary Bennett did not offer or negotiate any terms of a residential mortgage loan for Cassandra Leah Kirk, states that the signature of Zachary Bennett on the loan application is not Zachary Bennett's signature and further states that Zachary Bennett did not have any contact with Cassandra Leah Kirk regarding the loan application.

(n) EFC Mortgage received a residential mortgage loan

application from Anthony R. Williams dated February 23, 2011. The loan originator listed on the residential mortgage loan application is Zac Bennett with a loan originator identifier number of 237626. The Respondent's address is listed as 123 Commercial St., Broken Arrow, OK 74012.

(i) An affidavit signed by Zachary Bennett on January 18, 2012 states that Zachary Bennett reviewed the loan file of Anthony R. Williams, states that Zachary Bennett did not take the loan application of Anthony R. Williams, states that Zachary Bennett did not offer or negotiate any terms of a residential mortgage loan for Anthony R. Williams, states that the signature of Zac Bennett on the loan application is not Zachary Bennett's signature and further states that Zachary Bennett did not have any contact with Anthony R. Williams regarding the loan application.

(ii) The address of record for the Respondent on February 23, 2011 was 7715 E. 111th Street, Suite 106, Tulsa, Oklahoma 74133.

(iii) The Respondent was not licensed to transact business as a mortgage broker at 123 W. Commercial Street, Broken Arrow, Oklahoma 74012 on February 23, 2011.

(o) EFC Mortgage received a residential mortgage loan application from Steve Dunagan and Rosa Marie Pingleton dated February 28, 2011. The loan originator listed on the residential mortgage loan application is Zac Bennett with a loan originator identifier number of 237626. The Respondent's address is listed as 123 Commercial St., Broken Arrow, OK 74012.

(i) An affidavit signed by Zachary Bennett on January 18, 2012 states that Zachary Bennett reviewed the loan file of Steve Dunagan and Rosa Marie Pingleton, states that Zachary Bennett did not take the loan application of Steve Dunagan and Rosa Marie Pingleton, states that Zachary Bennett did not offer or negotiate any terms of a residential mortgage loan for Steve Dunagan and Rosa Marie Pingleton, states that the signature of Zac Bennett on the loan application is not Zachary Bennett's signature and further states that Zachary Bennett did not have any contact with Steve Dunagan and Rosa Marie Pingleton regarding the loan application.

(ii) The address of record for the Respondent on February 28, 2011 was 7715 E. 111th Street, Suite 106, Tulsa,

Oklahoma 74133.

(iii) The Respondent was not licensed to transact business as a mortgage broker at 123 W. Commercial Street, Broken Arrow, Oklahoma 74012 on February 28, 2011.

(p) EFC Mortgage received a residential mortgage loan application from Orlena Louise Puckett dated March 4, 2011. The loan originator listed on the residential mortgage loan application is Zac Bennett with a loan originator identifier number of 237626. The Respondent's address is listed as 7715 E 111 Street, Suite 106, Tulsa, Oklahoma 74133.

(i) An affidavit signed by Zachary Bennett on January 18, 2012 states that Zachary Bennett reviewed the loan file of Orlena Louise Puckett, states that Zachary Bennett did not take the loan application of Orlena Louise Puckett, states that Zachary Bennett did not offer or negotiate any terms of a residential mortgage loan for Orlena Louise Puckett, states that the signature of Zac Bennett on the loan application is not Zachary Bennett's signature and further states that Zachary Bennett did not have any contact with Orlena Louise Puckett regarding the loan application.

(q) EFC Mortgage received a residential mortgage loan application from Usman A. Chaudhry dated March 8, 2011. The loan originator listed on the residential mortgage loan application is Zac Bennett with a loan originator identifier number of 237626. The Respondent's address is listed as 7715 E 111 Street, Suite 106, Tulsa, Oklahoma 74133.

(i) An affidavit signed by Zachary Bennett on January 18, 2012 states that Zachary Bennett reviewed the loan file of Usman A. Chaudhry, states that Zachary Bennett did not take the loan application of Usman A. Chaudhry, states that Zachary Bennett did not offer or negotiate any terms of a residential mortgage loan for Usman A. Chaudhry, states that the signature of Zac Bennett on the loan application is not Zachary Bennett's signature and further states that Zachary Bennett did not have any contact with Usman A. Chaudhry regarding the loan application.

(r) EFC Mortgage received a residential mortgage loan application from Brian K. Suit dated March 14, 2011. The loan originator listed on the residential mortgage loan application is Zac Bennett with a loan originator identifier number of

237626. The Respondent's address is listed as 123 Commercial St., Broken Arrow, OK 74012.

(i) An affidavit signed by Zachary Bennett on January 18, 2012 states that Zachary Bennett reviewed the loan file of Brian K. Suit, states that Zachary Bennett did not take the loan application of Brian K. Suit, states that Zachary Bennett did not offer or negotiate any terms of a residential mortgage loan for Brian K. Suit, states that the signature of Zac Bennett on the loan application is not Zachary Bennett's signature and further states that Zachary Bennett did not have any contact with Brian K. Suit regarding the loan application.

(ii) The address of record for the Respondent on March 14, 2011 was 7715 E. 111th Street, Suite 106, Tulsa, Oklahoma 74133.

(iii) The Respondent was not licensed to transact business as a mortgage broker at 123 W. Commercial Street, Broken Arrow, Oklahoma 74012 on March 14, 2011.

(s) EFC Mortgage received a residential mortgage loan application from Monica D. Rothrock dated March 24, 2011. The loan originator listed on the residential mortgage loan application is Zac Bennett with a loan originator identifier number of 237626. The Respondent's address is listed as 7715 E 111 Street, Suite 106, Tulsa, Oklahoma 74133.

(i) An affidavit signed by Zachary Bennett on January 18, 2012 states that Zachary Bennett reviewed the loan file of Monica D. Rothrock, states that Zachary Bennett did not take the loan application of Monica D. Rothrock, states that Zachary Bennett did not offer or negotiate any terms of a residential mortgage loan for Monica D. Rothrock, states that the signature of Zac Bennett on the loan application is not Zachary Bennett's signature and further states that Zachary Bennett did not have any contact with Monica D. Rothrock regarding the loan application.

(t) EFC Mortgage received a residential mortgage loan application from Denise L. Batchelor dated March 25, 2011. The loan originator listed on the residential mortgage loan application is Zac Bennett with a loan originator identifier number of 237626. The Respondent's address is listed as 123 W. Commercial St., Broken Arrow, OK 74012.

(i) An affidavit signed by Zachary Bennett on January 18, 2012 states that Zachary Bennett reviewed the loan file of Denise L. Batchelor, states that Zachary Bennett did not take the loan application of Denise L. Batchelor, states that Zachary Bennett did not offer or negotiate any terms of a residential mortgage loan for Denise L. Batchelor, states that the signature of Zac Bennett on the loan application is not Zachary Bennett's signature and further states that Zachary Bennett did not have any contact with Denise L. Batchelor regarding the loan application.

(ii) The address of record for the Respondent on March 25, 2011 was 7715 E. 111th Street, Suite 106, Tulsa, Oklahoma 74133.

(iii) The Respondent was not licensed to transact business as a mortgage broker at 123 W. Commercial Street, Broken Arrow, Oklahoma 74012 on March 25, 2011.

(u) EFC Mortgage received a residential mortgage loan application from Matthew Jeffrey Delsignore dated March 28, 2011. The loan originator listed on the residential mortgage loan application is Zac Bennett with a loan originator identifier number of 237626. The Respondent's address is listed as 7715 E 111 Street S, Suite 106, Tulsa, Oklahoma 74133.

(i) An affidavit signed by Zachary Bennett on January 18, 2012 states that Zachary Bennett reviewed the loan file of Matthew Jeffrey Delsignore, states that Zachary Bennett did not take the loan application of Matthew Jeffrey Delsignore, states that Zachary Bennett did not offer or negotiate any terms of a residential mortgage loan for Matthew Jeffrey Delsignore, states that the signature of Zac Bennett on the loan application is not Zachary Bennett's signature and further states that Zachary Bennett did not have any contact with Matthew Jeffrey Delsignore regarding the loan application.

(v) EFC Mortgage received a residential mortgage loan application from Donna Lanette Stephens dated April 7, 2011. The loan originator listed on the residential mortgage loan application is Zac Bennett with a loan originator identifier number of 237626. The Respondent's address is listed as 123 W. Commercial St., Broken Arrow, OK 74012.

(i) An affidavit signed by Zachary Bennett on January 18, 2012 states that Zachary Bennett reviewed the loan

file of Donna Lanette Stephens, states that Zachary Bennett did not take the loan application of Donna Lanette Stephens, states that Zachary Bennett did not offer or negotiate any terms of a residential mortgage loan for Donna Lanette Stephens, states that the signature of Zac Bennett on the loan application is not Zachary Bennett's signature and further states that Zachary Bennett did not have any contact with Donna Lanette Stephens regarding the loan application.

(ii) The address of record for the Respondent on April 7, 2011 was 7715 E. 111th Street, Suite 106, Tulsa, Oklahoma 74133.

(iii) The Respondent was not licensed to transact business as a mortgage broker at 123 W. Commercial Street, Broken Arrow, Oklahoma 74012 on April 7, 2011.

(w) EFC Mortgage received a residential mortgage loan application from Earl W. Stephens, Sr and Madeline L. Stephens. dated April 13, 2011. The loan originator listed on the residential mortgage loan application is Zac Bennett with a loan originator identifier number of 237626. The Respondent's address is listed as 123 W. Commercial St., Broken Arrow, OK 74012.

(i) An affidavit signed by Zachary Bennett on January 18, 2012 states that Zachary Bennett reviewed the loan file of Earl W. Stephens, Sr. and Madeline L. Stephens, states that Zachary Bennett did not take the loan application of Earl W. Stephens, Sr. and Madeline L. Stephens, states that Zachary Bennett did not offer or negotiate any terms of a residential mortgage loan for Earl W. Stephens, Sr. and Madeline L. Stephens, states that the signature of Zac Bennett on the loan application is not Zachary Bennett's signature and further states that Zachary Bennett did not have any contact with Earl W. Stephens, Sr. and Madeline L. Stephens regarding the loan application.

(ii) The address of record for the Respondent on April 13, 2011 was 7715 E. 111th Street, Suite 106, Tulsa, Oklahoma 74133.

(iii) The Respondent was not licensed to transact business as a mortgage broker at 123 W. Commercial Street, Broken Arrow, Oklahoma 74012 on April 13, 2011.

(x) EFC Mortgage received a residential mortgage loan application from Stephannie A. Nelson dated April 22, 2011. The loan originator listed on the residential mortgage loan application is Zac Bennett with a loan originator identifier number of 237626. The Respondent's address is listed as 123 W. Commercial St., Broken Arrow, OK 74012.

(i) An affidavit signed by Zachary Bennett on January 18, 2012 states that Zachary Bennett reviewed the loan file of Stephannie A. Nelson, states that Zachary Bennett did not take the loan application of Stephannie A. Nelson, states that Zachary Bennett did not offer or negotiate any terms of a residential mortgage loan for Stephannie A. Nelson and further states that Zachary Bennett did not have any contact with Stephannie A. Nelson regarding the loan application.

(ii) The address of record for the Respondent on April 22, 2011 was 7715 E. 111th Street, Suite 106, Tulsa, Oklahoma 74133.

(iii) The Respondent was not licensed to transact business as a mortgage broker at 123 W. Commercial Street, Broken Arrow, Oklahoma 74012 on April 22, 2011.

(y) EFC Mortgage received a residential mortgage loan application from Steven Michael Howard and Christina Grace Shoffner dated April 25, 2011. The loan originator listed on the residential mortgage loan application is Zac Bennett with a loan originator identifier number of 237626. The Respondent's address is listed as 7715 E 111 Street S, Suite 106, Tulsa, Oklahoma 74133.

(i) An affidavit signed by Zachary Bennett on January 18, 2012 states that Zachary Bennett reviewed the loan file of Steven Michael Howard and Christina Grace Shoffner, states that Zachary Bennett did not take the loan application of Steven Michael Howard and Christina Grace Shoffner, states that Zachary Bennett did not offer or negotiate any terms of a residential mortgage loan for Steven Michael Howard and Christina Grace Shoffner, states that the signature of Zac Bennett on the loan application is not Zachary Bennett's signature and further states that Zachary Bennett did not have any contact with Steven Michael Howard and Christina Grace Shoffner regarding the loan application.

(z) EFC Mortgage received a residential mortgage loan

application from Angela Y. Wanecek dated April 26, 2011. The loan originator listed on the residential mortgage loan application is Becky Mullings with a loan originator identifier number of 258973. The Respondent's address is listed as 123 W. Commercial St., Broken Arrow, OK 74012.

(i) An affidavit signed by Becky Mullings on January 25, 2012 states that Becky Mullings reviewed the loan file of Angela Y. Wanecek, states that Becky Mullings did not take the loan application of Angela Y. Wanecek, states that Becky Mullings did not offer or negotiate any terms of a residential mortgage loan for Angela Y. Wanecek, states that the signature of Becky Mullings on the loan application is not Becky Mullings's signature and further states that Becky Mullings did not have any contact with Angela Y. Wanecek regarding the loan application.

(ii) The address of record for the Respondent on April 26, 2011 was 7715 E. 111th Street, Suite 106, Tulsa, Oklahoma 74133.

(iii) The Respondent was not licensed to transact business as a mortgage broker at 123 W. Commercial Street, Broken Arrow, Oklahoma 74012 on April 26, 2011.

(aa) EFC Mortgage received a residential mortgage loan application from Morgan Kyle Buffington dated April 26, 2011. The loan originator listed on the residential mortgage loan application is Zac Bennett with a loan originator identifier number of 237626. The Respondent's address is listed as 123 W. Commercial St., Broken Arrow, OK 74012.

(i) An affidavit signed by Zachary Bennett on January 18, 2012 states that Zachary Bennett reviewed the loan file of Morgan Kyle Buffington, states that Zachary Bennett did not take the loan application of Morgan Kyle Buffington, states that Zachary Bennett did not offer or negotiate any terms of a residential mortgage loan for Morgan Kyle Buffington, states that the signature of Zac Bennett on the loan application is not Zachary Bennett's signature and further states that Zachary Bennett did not have any contact with Morgan Kyle Buffington regarding the loan application.

(ii) The address of record for EFC Mortgage on April 26, 2011 was 7715 E. 111th Street, Suite 106, Tulsa, Oklahoma 74133.

(iii) EFC Mortgage was not licensed to transact business as a mortgage broker at 123 W. Commercial Street, Broken Arrow, Oklahoma 74012 on April 26, 2011.

(bb) EFC Mortgage received a residential mortgage loan application from Tommy P. Burke, Jr. dated April 26, 2011. The loan originator listed on the residential mortgage loan application is Zac Bennett with a loan originator identifier number of 237626. The address of EFC Mortgage is listed as 123 W. Commercial St., Broken Arrow, OK 74012.

(i) An affidavit signed by Zachary Bennett on January 18, 2012 states that Zachary Bennett reviewed the loan file of Tommy P. Burke, Jr., states that Zachary Bennett did not take the loan application of Tommy P. Burke, Jr., states that Zachary Bennett did not offer or negotiate any terms of a residential mortgage loan for Tommy P. Burke, Jr., states that the signature of Zac Bennett on the loan application is not Zachary Bennett's signature and further states that Zachary Bennett did not have any contact with Tommy P. Burke, Jr. regarding the loan application.

(ii) The address of record for EFC Mortgage on April 26, 2011 was 7715 E. 111th Street, Suite 106, Tulsa, Oklahoma 74133.

(iii) EFC Mortgage was not licensed to transact business as a mortgage broker at 123 W. Commercial Street, Broken Arrow, Oklahoma 74012 on April 26, 2011.

(cc) EFC Mortgage received a residential mortgage loan application from Toby S. Wren dated April 27, 2011. The loan originator listed on the residential mortgage loan application is Zac Bennett with a loan originator identifier number of 237626. The Respondent's address is listed as 123 W. Commercial St., Broken Arrow, OK 74012.

(i) An affidavit signed by Zachary Bennett on January 18, 2012 states that Zachary Bennett reviewed the loan file of Toby S. Wren, states that Zachary Bennett did not take the loan application of Toby S. Wren, states that Zachary Bennett did not offer or negotiate any terms of a residential mortgage loan for Toby S. Wren, states that the signature of Zac Bennett on the loan application is not Zachary Bennett's signature and further states that Zachary Bennett did not have any contact with Toby S. Wren regarding the loan application.

(ii) The address of record for EFC Mortgage on April 27, 2011 was 7715 E. 111th Street, Suite 106, Tulsa, Oklahoma 74133.

(iii) EFC Mortgage was not licensed to transact business as a mortgage broker at 123 W. Commercial Street, Broken Arrow, Oklahoma 74012 on April 27, 2011.

(dd) EFC Mortgage received a residential mortgage loan application from Arnold D. Crase dated May 4, 2011. The loan originator listed on the residential mortgage loan application is Zac Bennett with a loan originator identifier number of 237626. The Respondent's address is listed as 7715 E 111 Street S., Suite 106, Tulsa, Oklahoma 74133.

(i) An affidavit signed by Zachary Bennett on January 18, 2012 states that Zachary Bennett reviewed the loan file of Arnold D. Crase, states that Zachary Bennett did not take the loan application of Arnold D. Crase, states that Zachary Bennett did not offer or negotiate any terms of a residential mortgage loan for Arnold D. Crase, states that the signature of Zac Bennett on the loan application is not Zachary Bennett's signature and further states that Zachary Bennett did not have any contact with Arnold D. Crase regarding the loan application.

(ii) The address of record for EFC Mortgage on May 4, 2011 was 123 W. Commercial Street, Broken Arrow, Oklahoma 74012.

(iii) EFC Mortgage was not licensed to transact business as a mortgage broker at 7715 E. 111th Street, Suite 106, Tulsa, Oklahoma 74133 on May 4, 2011.

(ee) EFC Mortgage received a residential mortgage loan application from Gregory D. Gauthier dated May 5, 2011. The loan originator listed on the residential mortgage loan application is Zac Bennett with a loan originator identifier number of 237626. The Respondent's address is listed as 123 W. Commercial St., Broken Arrow, OK 74012.

(i) An affidavit signed by Zachary Bennett on January 18, 2012 states that Zachary Bennett reviewed the loan file of Gregory D. Gauthier, states that Zachary Bennett did not take the loan application of Gregory D. Gauthier, states that

Zachary Bennett did not offer or negotiate any terms of a residential mortgage loan for Gregory D. Gauthier, states that the signature of Zac Bennett on the loan application is not Zachary Bennett's signature and further states that Zachary Bennett did not have any contact with Gregory D. Gauthier regarding the loan application.

(ff) EFC Mortgage received a residential mortgage loan application from Stephannie A. Nelson dated May 18, 2011. The loan originator listed on the residential mortgage loan application is Zac Bennett with a loan originator identifier number of 237626. The Respondent's address is listed as 123 W. Commercial St., Broken Arrow, OK 74012.

(i) An affidavit signed by Zachary Bennett on January 18, 2012 states that Zachary Bennett reviewed the loan file of Stephannie A. Nelson, states that Zachary Bennett did not take the loan application of Stephannie A. Nelson, states that Zachary Bennett did not offer or negotiate any terms of a residential mortgage loan for Stephannie A. Nelson, states that the signature of Zac Bennett on the loan application is not Zachary Bennett's signature and further states that Zachary Bennett did not have any contact with Stephannie A. Nelson regarding the loan application.

(gg) EFC Mortgage received a residential mortgage loan application from Michael D. Holt, Jr. dated June 7, 2011. The loan originator listed on the residential mortgage loan application is Zac Bennett with a loan originator identifier number of 237626. The address of EFC Mortgage is listed as 123 W. Commercial St., Broken Arrow, OK 74012.

(i) An affidavit signed by Zachary Bennett on January 18, 2012 states that Zachary Bennett reviewed the loan file of Michael D. Holt, Jr., states that Zachary Bennett did not take the loan application of Michael D. Holt, Jr., states that Zachary Bennett did not offer or negotiate any terms of a residential mortgage loan for Michael D. Holt, Jr., states that the signature of Zac Bennett on the loan application is not Zachary Bennett's signature and further states that Zachary Bennett did not have any contact with Michael D. Holt, Jr. regarding the loan application.

(hh) EFC Mortgage received a residential mortgage loan application from Joshua R. Thomas dated June 7, 2011. The loan originator listed on the residential mortgage loan application

is Zac Bennett with a loan originator identifier number of 237626. The address of EFC Mortgage is listed as 123 W. Commercial St., Broken Arrow, OK 74012.

(i) An affidavit signed by Zachary Bennett on January 18, 2012 states that Zachary Bennett reviewed the loan file of Joshua R. Thomas, states that Zachary Bennett did not take the loan application of Joshua R. Thomas, states that Zachary Bennett did not offer or negotiate any terms of a residential mortgage loan for Joshua R. Thomas, states that the signature of Zac Bennett on the loan application is not Zachary Bennett's signature and further states that Zachary Bennett did not have any contact with Joshua R. Thomas regarding the loan application.

(ii) EFC Mortgage received a residential mortgage loan application from Ronald Louis Baskinger dated July 25, 2011. The loan originator listed on the residential mortgage loan application is Becky Mullings with a loan originator identifier number of 258973. The address of EFC Mortgage is listed as 123 W. Commercial St., Broken Arrow, OK 74012.

(i) An affidavit signed by Becky Mullings on January 25, 2012 states that Becky Mullings reviewed the loan file of Ronald Louis Baskinger, states that Becky Mullings did not take the loan application of Ronald Louis Baskinger, states that Becky Mullings did not offer or negotiate any terms of a residential mortgage loan for Robert Louis Baskinger, states that the signature of Becky Mullings on the loan application is not Becky Mullings's signature and further states that Becky Mullings did not have any contact with Ronald Louis Baskinger regarding the loan application.

(jj) EFC Mortgage received a residential mortgage loan application from Betty Saffell dated July 27, 2011. The loan originator listed on the residential mortgage loan application is Becky Mullings with a loan originator identifier number of 258973. The address of EFC Mortgage is listed as 123 W. Commercial St., Broken Arrow, OK 74012.

(i) An affidavit signed by Becky Mullings on January 25, 2012 states that Becky Mullings reviewed the loan file of Betty Saffell, states that Becky Mullings did not take the loan application of Betty Saffell, states that Becky Mullings did not offer or negotiate any terms of a residential mortgage loan for Betty Saffell, states that the signature of

Becky Mullings on the loan application is not Becky Mullings's signature and further states that Becky Mullings did not have any contact with Betty Saffell regarding the loan application.

(kk) EFC Mortgage received a residential mortgage loan application from Karen J. Frampton dated August 9, 2011. The loan originator listed on the residential mortgage loan application is Becky Mullings with a loan originator identifier number of 258973. The address of EFC Mortgage is listed as 123 W. Commercial St., Broken Arrow, OK 74012.

(i) An affidavit signed by Becky Mullings on January 25, 2012 states that Becky Mullings reviewed the loan file of Karen J. Frampton, states that Becky Mullings did not take the loan application of Karen J. Frampton, states that Becky Mullings did not offer or negotiate any terms of a residential mortgage loan for Karen J. Frampton, states that the signature of Becky Mullings on the loan application is not Becky Mullings's signature and further states that Becky Mullings did not have any contact with Karen J. Frampton regarding the loan application.

(ll) EFC Mortgage received a residential mortgage loan application from Earl R. Misener dated August 19, 2011. The loan originator listed on the residential mortgage loan application is Becky Mullings with a loan originator identifier number of 258973. The address of EFC Mortgage is listed as 123 W. Commercial St., Broken Arrow, OK 74012.

(i) An affidavit signed by Becky Mullings on January 25, 2012 states that Becky Mullings reviewed the loan file of Earl R. Misener, states that Becky Mullings did not take the loan application of Earl R. Misener, states that Becky Mullings did not offer or negotiate any terms of a residential mortgage loan for Earl R. Misener, states that the signature of Becky Mullings on the loan application is not Becky Mullings's signature and further states that Becky Mullings did not have any contact with Earl R. Misener regarding the loan application.

(mm) EFC Mortgage received a residential mortgage loan application from Flora K. Lovett dated August 29, 2011. The loan originator listed on the residential mortgage loan application is Becky Mullings with a loan originator identifier number of 258973. The address of EFC Mortgage is listed as 123 W. Commercial St., Broken Arrow, OK 74012.

(i) An affidavit signed by Becky Mullings on January 25, 2012 states that Becky Mullings reviewed the loan file of Flora K. Lovett, states that Becky Mullings did not take the loan application of Flora K. Lovett, states that Becky Mullings did not offer or negotiate any terms of a residential mortgage loan for Flora K. Lovett, states that the signature of Becky Mullings on the loan application is not Becky Mullings's signature and further states that Becky Mullings did not have any contact with Flora K. Lovett regarding the loan application.

(nn) EFC Mortgage received a residential mortgage loan application from Lelannie R. Lyons dated September 15, 2011. The loan originator listed on the residential mortgage loan application is Becky Mullings with a loan originator identifier number of 258973. The address of EFC Mortgage is listed as 123 W. Commercial St., Broken Arrow, OK 74012.

(i) An affidavit signed by Becky Mullings on January 25, 2012 states that Becky Mullings reviewed the loan file of Lelannie R. Lyons, states that Becky Mullings did not take the loan application of Lelannie R. Lyons, states that Becky Mullings did not offer or negotiate any terms of a residential mortgage loan for Lelannie R. Lyons, states that the signature of Becky Mullings on the loan application is not Becky Mullings's signature and further states that Becky Mullings did not have any contact with Lelannie R. Lyons regarding the loan application.

(oo) EFC Mortgage received a residential mortgage loan application from Billie J. Medley dated September 15, 2011. The loan originator listed on the residential mortgage loan application is Becky Mullings with a loan originator identifier number of 258973. The address of EFC Mortgage is listed as 123 W. Commercial St., Broken Arrow, OK 74012.

(i) An affidavit signed by Becky Mullings on January 25, 2012 states that Becky Mullings reviewed the loan file of Billie J. Medley, states that Becky Mullings did not take the loan application of Billie J. Medley, states that Becky Mullings did not offer or negotiate any terms of a residential mortgage loan for Billie J. Medley, states that the signature of Becky Mullings on the loan application is not Becky Mullings's signature and further states that Becky Mullings did not have any contact with Billie J. Medley regarding the loan application.

(pp) EFC Mortgage received a residential mortgage loan application from Derek L. Bridgman dated September 21, 2011. The loan originator listed on the residential mortgage loan application is Becky Mullings with a loan originator identifier number of 258973. The address of EFC Mortgage is listed as 123 W. Commercial St., Broken Arrow, OK 74012.

(i) An affidavit signed by Becky Mullings on January 25, 2012 states that Becky Mullings reviewed the loan file of Derek L. Bridgman, states that Becky Mullings did not take the loan application of Derek L. Bridgman, states that Becky Mullings did not offer or negotiate any terms of a residential mortgage loan for Derek L. Bridgman, states that the signature of Becky Mullings on the loan application is not Becky Mullings's signature and further states that Becky Mullings did not have any contact with Derek L. Bridgman regarding the loan application.

(qq) EFC Mortgage received a residential mortgage loan application from Michael D. Summers dated October 11, 2011. The loan originator listed on the residential mortgage loan application is Becky Mullings with a loan originator identifier number of 258973. The Respondent's address is listed as 123 W. Commercial St., Broken Arrow, OK 74012.

(i) An affidavit signed by Becky Mullings on January 25, 2012 states that Becky Mullings reviewed the loan file of Michael D. Summers, states that Becky Mullings did not take the loan application of Michael D. Summers, states that Becky Mullings did not offer or negotiate any terms of a residential mortgage loan for Michael D. Summers, states that the signature of Becky Mullings on the loan application is not Becky Mullings's signature and further states that Becky Mullings did not have any contact with Michael D. Summers regarding the loan application.

(rr) EFC Mortgage received a residential mortgage loan application from Sunny D. Ferguson dated October 20, 2011. The loan originator listed on the residential mortgage loan application is Becky Mullings with a loan originator identifier number of 258973. The address of EFC Mortgage is listed as 123 W. Commercial St., Broken Arrow, OK 74012.

(i) An affidavit signed by Becky Mullings on January 25, 2012 states that Becky Mullings reviewed the loan file of Sunny D. Ferguson, states that Becky Mullings did not

take the loan application of Sunny D. Ferguson, states that Becky Mullings did not offer or negotiate any terms of a residential mortgage loan for Sunny D. Ferguson, states that the signature of Becky Mullings on the loan application is not Becky Mullings's signature and further states that Becky Mullings did not have any contact with Sunny D. Ferguson regarding the loan application.

(ss) EFC Mortgage received a residential mortgage loan application from Aaron M. Duff dated October 31, 2011. The loan originator listed on the residential mortgage loan application is Menia Epley with a loan originator identifier number of 211139. The Respondent's address is listed as 123 Commercial St., Broken Arrow, OK 74012.

(i) An affidavit signed by Philiamenia Epley on January 20, 2012 states that Philiamenia Epley reviewed the loan file of Aaron M. Duff, states that Philiamenia Epley did not take the loan application of Aaron M. Duff, states that Philiamenia Epley did not offer or negotiate any terms of a residential mortgage loan for Aaron M. Duff and further states that Philiamenia Epley did not have any contact with Aaron M. Duff regarding the loan application.

(tt) EFC Mortgage received a residential mortgage loan application from Mandy K. Marlow dated November 9, 2011. The loan originator listed on the residential mortgage loan application is Becky Mullings with a loan originator identifier number of 258973. The address of EFC Mortgage is listed as 123 W. Commercial St., Broken Arrow, OK 74012.

(i) An affidavit signed by Becky Mullings on January 25, 2012 states that Becky Mullings reviewed the loan file of Mandy K. Marlow, states that Becky Mullings did not take the loan application of Mandy K. Marlow, states that Becky Mullings did not offer or negotiate any terms of a residential mortgage loan for Mandy K. Marlow, states that the signature of Becky Mullings on the loan application is not Becky Mullings's signature and further states that Becky Mullings did not have any contact with Mandy K. Marlow regarding the loan application.

(uu) EFC Mortgage received a residential mortgage loan application from Christopher L. Kos dated November 22, 2011. The loan originator listed on the residential mortgage loan application is Becky Mullings with a loan originator identifier number of 258973. The address of EFC Mortgage is listed as 123

W. Commercial St., Broken Arrow, OK 74012.

(i) An affidavit signed by Becky Mullings on January 25, 2012 states that Becky Mullings reviewed the loan file of Christopher L. Kos, states that Becky Mullings did not take the loan application of Christopher L. Kos, states that Becky Mullings did not offer or negotiate any terms of a residential mortgage loan for Christopher L. Kos, states that the signature of Becky Mullings on the loan application is not Becky Mullings's signature and further states that Becky Mullings did not have any contact with Christopher L. Kos regarding the loan application.

(vv) EFC Mortgage received a residential mortgage loan application from Shannon Bollinger dated December 13, 2011. The loan originator listed on the residential mortgage loan application is Becky Mullings with a loan originator identifier number of 258973. The address of EFC Mortgage is listed as 123 W. Commercial St., Broken Arrow, OK 74012.

(i) An affidavit signed by Becky Mullings on January 25, 2012 states that Becky Mullings reviewed the loan file of Shannon Bollinger, states that Becky Mullings did not take the loan application of Shannon Bollinger, states that Becky Mullings did not offer or negotiate any terms of a residential mortgage loan for Shannon Bollinger, states that the signature of Becky Mullings on the loan application is not Becky Mullings's signature and further states that Becky Mullings did not have any contact with Shannon Bollinger regarding the loan application.

(ww) EFC Mortgage received a residential mortgage loan application from Gregory L. Hancock and Bonnie J. Hancock dated December 13, 2011. The loan originator listed on the residential mortgage loan application is Becky Mullings. The address of EFC Mortgage is listed as 123 W. Commercial St., Broken Arrow, OK 74012.

(i) An affidavit signed by Becky Mullings on January 25, 2012 states that Becky Mullings reviewed the loan file of Gregory L. Hancock and Bonnie J. Hancock, states that Becky Mullings did not take the loan application of Gregory L. Hancock and Bonnie J. Hancock, states that Becky Mullings did not offer or negotiate any terms of a residential mortgage loan for Gregory L. Hancock and Bonnie J. Hancock, states that the signature of Becky Mullings on the loan application is not Becky

Mullings's signature and further states that Becky Mullings did not have any contact with Gregory L. Hancock and Bonnie J. Hancock regarding the loan application.

(xx) EFC Mortgage received a residential mortgage loan application from Sammy D. Heath dated December 16, 2011. The loan originator listed on the residential mortgage loan application is Becky Mullings with a loan originator identifier number of 258973. The address of EFC Mortgage is listed as 123 W. Commercial St., Broken Arrow, OK 74012.

(i) An affidavit signed by Becky Mullings on January 25, 2012 states that Becky Mullings reviewed the loan file of Sammy D. Heath, states that Becky Mullings did not take the loan application of Sammy D. Heath, states that Becky Mullings did not offer or negotiate any terms of a residential mortgage loan for Sammy D. Heath, states that the signature of Becky Mullings on the loan application is not Becky Mullings's signature and further states that Becky Mullings did not have any contact with Sammy D. Heath regarding the loan application.

6. NMLS indicates that the 2011 Quarter one (Q1) Oklahoma Standard Residential Mortgage Loan Activity Report (Standard RMLA) for EFC Mortgage was filed May 18, 2011 by Philiamenia Epley.

(a) An affidavit signed by Philiamenia Epley on January 20, 2012 states that Philiamenia Epley did not prepare the 2011 Q1 Standard RMLA for EFC Mortgage.

7. The Respondent's 2011 Q1 Standard RMLA was required to be filed on NMLS on May 15, 2011.

ALLEGED VIOLATIONS OF LAW

1. The Respondent violated 59 O.S. §§ 2095.18(8) and 2095.11(B) by failing to comply with the SAFE Act or rules promulgated under the SAFE Act by failing to oversee the operations of the principal place of business for EFC Mortgage as the designated loan originator for EFC Mortgage by failing to prevent EFC Mortgage from conducting the following activities:

(a) listing Zachary Bennett, Philiamenia Epley and Becky Mullings as the mortgage loan originators on residential mortgage loan applications when such individuals did not take the residential mortgage loans at issue and/or offer or

negotiate the terms of such residential mortgage loan applications, which is a violation of 59 O.S. §§ 2095.18(1), 2095.18(2) and 2095.18(9).

(b) requiring Becky Mullings to sign Zachary Bennett's name on the residential mortgage loan application of Cynthia D. Clark, which is a violation of 59 O.S. §2095.18(11).

(c) conducting any business covered by the SAFE Act without holding a valid license required under the SAFE Act by transacting business at 123 Commercial Street, Broken Arrow, Oklahoma 74012 as a mortgage broker at such location without a mortgage broker license at such location, which is a violation of 59 O.S. § 2095.18(6).

(d) conducting any business covered by the SAFE Act without holding a valid license required under the SAFE Act by transacting business at 7715 E. 111 Street, Suite 106, Tulsa, Oklahoma 74133 as a mortgage broker at such location without a mortgage broker license at such location, which is a violation of 59 O.S. § 2095.18(6).

(e) failing to notify the Administrator through NMLS at least thirty (30) days before the address of the principal place of business of the Respondent at 7715 E. 111 Street, Suite 106, Tulsa, Oklahoma 74133 was changed to 123 W. Commercial Street, Broken Arrow, Oklahoma 74012, which is a violation of 59 O.S. § 2095.18(8) and OKLA. ADMIN. CODE § 160:55-3-9.1(a).

(f) failing to notify the Administrator through NMLS at least thirty (30) days before the Respondent's business location at 7715 E. 111 Street, Suite 106, Tulsa, Oklahoma 74133 was closed, which is a violation of 59 O.S. § 2095.18(8) and OKLA. ADMIN. CODE § 160:55-3-9.1(b).

(g) filing the 2011 Q1 Standard RMLA on May 18, 2011 under the name of Philiamenia Epley when such report was not prepared or filed by Philiamenia Epley, which is a violation of 59 O.S. § 2095.18(10).

(i) failing to submit to NMLS reports of condition, which shall be in such form and shall contain such information as NMLS may require by failing to submit the 2011 Q1 Standard RMLA as required by NMLS by failing to submit such report on the due date of May 15, 2011, which is a violation of 59 O.S. §§ 2095.18(8) and 2095.24.

2. The Respondent violated 59 O.S. §§ 2095.18(8) and 2095.7(3) by failing to demonstrate financial responsibility, character and general fitness such as to command the confidence of the community and to warrant a determination that the Respondent will operate honestly, fairly and efficiently as a mortgage loan originator within the purposes of the SAFE Act.

TIME, PLACE AND NATURE OF HEARING

1. A hearing will be held before an independent hearing examiner on July 16, 2012 at 1:30 p.m. at the office of the Department of Consumer Credit, 3613 N.W. 56th Street, Suite 240, Oklahoma City, Oklahoma 73112.

2. The purpose of the hearing is to address the allegations contained in this Notice and to determine if any penalties authorized by the SAFE Act shall be imposed against the Respondent.

3. Correspondence regarding this matter shall be directed to Roy John Martin, General Counsel, Department of Consumer Credit, 3613 N.W. 56th Street, Suite 240, Oklahoma City, Oklahoma 73112, telephone number 405-522-4665, email: rmartin@okdocc.ok.gov.



Roy John Martin

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