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**STATE OF WASHINGTON  
DEPARTMENT OF FINANCIAL INSTITUTIONS  
DIVISION OF CONSUMER SERVICES**

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IN THE MATTER OF DETERMINING  
Whether there has been a violation of the  
Consumer Loan Act of Washington by:

No. C-14-1568-16-CO01

CONSENT ORDER

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QUICKEN LOANS, INC., NMLS No. 3030,

Respondent.

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COME NOW the Director of the Department of Financial Institutions (Director), through his designee Charles E. Clark, Division Director, Division of Consumer Services, and Quicken Loans, Inc. (Respondent), by and through its counsel, Tim J. Filer and John L. Bley of Foster Pepper PLLC, and Jeffrey B. Morganroth of Morganroth & Morganroth, PLLC, and finding that the issues raised in the above-captioned matter may be economically and efficiently settled, agree to the entry of this Consent Order. This Consent Order is entered pursuant to chapter 31.04 of the Revised Code of Washington (RCW), and RCW 34.05.060 of the Administrative Procedure Act, based on the following:

**AGREEMENT AND ORDER**

The Department of Financial Institutions, Division of Consumer Services (Department) and Respondent have agreed upon a basis for resolution of the matters alleged in Statement of Charges No. C-14-1568-14-SC01 (Statement of Charges), entered June 15, 2015, attached hereto. Pursuant to chapter 31.04, the Consumer Loan Act (Act), and RCW 34.05.060 of the Administrative Procedure Act, Respondent hereby agrees to the Department's entry of this Consent Order and further agrees that the issues raised in the above-captioned matter may be economically and efficiently settled by entry of this Consent Order. The parties intend this Consent Order to fully and completely resolve all matters alleged in the Statement of Charges and all uncharged complaints pending before the Department at the time of the entry of this Consent Order.

**Based upon the foregoing:**

A. **Jurisdiction.** It is AGREED that the Department has jurisdiction over the subject matter of the activities discussed herein.

1 **B. Waiver of Hearing.** It is AGREED that Respondent has been informed of the right to a hearing before  
2 an administrative law judge, and hereby waives its right to a hearing and any and all administrative and  
3 judicial review of the issues raised in this matter, or of the resolution reached herein. Accordingly,  
4 Respondent, by the signature of its authorized representative below, and by the signatures of its attorneys  
5 below, withdraws its appeal of the Statement of Charges to the Office of Administrative Hearings.

6 **C. No Admission of Liability.** It is AGREED that this Consent Order represents a compromise and is for  
7 settlement purposes only. Respondent neither admits nor denies any wrong doing by entry of this Consent  
8 Order. It is further AGREED that Respondent will not make any public statement that is inconsistent with the  
9 terms of this Consent Order, and that nothing in this Consent Order affects Respondent's testimonial  
10 obligations or right to take legal or factual positions in defense of any subsequent administrative proceedings  
11 or litigation.

12 **D. Compliance with the Act.** It is AGREED and ORDERED that Respondent shall comply with the Act  
13 and the rules adopted thereunder, now existing and as hereafter amended, when advertising in Washington. In  
14 particular and without limitation, Respondent Quicken Loans shall comply with RCW 31.04.027(2), RCW  
15 31.04.027(7), RCW 31.04.027(13), and RCW 31.04.135.

16 **E. Compliance Examination.** It is AGREED and ORDERED that approximately one year from the date  
17 of entry of this Consent Order, Respondent shall be subject to an examination by the Department to determine  
18 compliance with the advertising provisions of the Act and with this Consent Order. It is further AGREED and  
19 ORDERED that Respondent shall be liable for and shall pay all costs of the examination authorized by  
20 WAC 208-620-590.

21 **F. Financial Literacy Payment.** Pursuant to RCW 31.04.093(7), the Director may accept payments to  
22 the Department for purposes of financial literacy and education programs authorized under RCW 43.320.150.  
23 Accordingly, in further compromise and in consideration of the additional terms set forth herein, it is  
24 AGREED that upon entry of this Consent Order Respondent shall pay by wire transfer \$250,000 to the  
25 Department for purposes of financial literacy and education programs (the "Financial Literacy Payment").

1 The Department, while reserving sole discretion to determine the use of the Financial Literacy Payment,  
2 acknowledges and will endeavor to honor Respondent's request that the Financial Literacy Payment be used  
3 to promote and support financial literacy services and programs benefiting Washington servicemembers,  
4 veterans, and their families. It is FURTHER AGREED and ORDERED that Respondent shall not advertise  
5 the Financial Literacy Payment.

6 **G. Rights of Non-Parties.** It is AGREED that the Department does not represent or have the consent of  
7 any person or entity not a party to this Consent Order to take any action concerning their personal legal rights,  
8 and this Consent Order does not limit or create any private rights or remedies against Respondent, limit or  
9 create liability of Respondent, or limit or create defenses of Respondent to any claims.

10 **H. Authority to Execute Order.** It is AGREED that the undersigned have represented and warranted that  
11 they have the full power and right to execute this Consent Order on behalf of the parties represented.

12 **I. Non-Compliance with Order.** It is AGREED that Respondent understands that failure to comply with  
13 the terms and conditions of this Consent Order may result in further legal action by the Director. In the event  
14 of such legal action, Respondent may be responsible to reimburse the Department for its costs and expenses,  
15 including attorney fees, incurred in pursuing such further action.

16 **J. Voluntarily Entered.** It is AGREED that Respondent has voluntarily entered into this Consent Order,  
17 which is effective when signed by the Director's designee.

18 **K. Completely Read, Understood, and Agreed.** It is AGREED that the authorized representatives of  
19 Respondent have read this Consent Order in its entirety and fully understand and agree to all of the same.

20 **L. Counterparts.** This Consent Order may be executed by the authorized agents of and attorneys for  
21 Respondent in any number of counterparts, including by facsimile or e-mail of a .pdf or similar file, each of  
22 which shall be deemed to be an original, but all of which, taken together, shall constitute one and the same  
23 Consent Order.

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1 **BY RESPONDENT:**  
2 **QUICKEN LOANS, INC.**

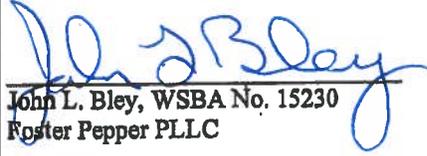
3   
4 **William C. Emerson, CEO**

3-23-2016  
Date

5 **Approved for Entry:**  
6 

3-30-2016  
Date

7 **Tim J. Filer, WSBA No. 16285**  
8 **Foster Pepper PLLC**

9   
10 **John L. Bley, WSBA No. 15230**  
11 **Foster Pepper PLLC**

3-30-2016  
Date

12 **Jeffrey B. Morganroth, SBM No. P41670**  
13 **Morganroth & Morganroth, PLLC**

\_\_\_\_\_  
Date

14 **Attorneys for Respondent Quicken Loans, Inc.**

15 **DO NOT WRITE BELOW THIS LINE**

16 THIS ORDER ENTERED THIS \_\_\_\_\_ DAY OF FEBRUARY, 2016.

17 **CHARLES E. CLARK**  
18 **Director, Division of Consumer Services**  
19 **Department of Financial Institutions**

20 Presented by:

21 Approved by:

22 \_\_\_\_\_  
23 **ANTHONY W. CARTER**  
24 **Senior Legal Examiner**

25 \_\_\_\_\_  
**STEVEN C. SHERMAN**  
**Enforcement Chief**

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BY RESPONDENT:  
QUICKEN LOANS, INC.

*[Signature]*

William C. Emerson, CEO  
Approved for Entry:

3-23-2016  
Date

Tim J. Filar, WSBA No. 16285  
Foster Pepper PLLC

\_\_\_\_\_  
Date

John L. Bley, WSBA No. 15230  
Foster Pepper PLLC

\_\_\_\_\_  
Date

*[Signature]*  
Jeffrey B. Morganroth, SBM No. P41670  
Morganroth & Morganroth, PLLC

3-28-16  
Date

Attorneys for Respondent Quicken Loans, Inc.

DO NOT WRITE BELOW THIS LINE

THIS ORDER ENTERED THIS 11<sup>th</sup> DAY OF April, 2016.

*[Signature]*  
CHARLES E. CLARK  
Director, Division of Consumer Services  
Department of Financial Institutions

Presented by:  
*[Signature]*  
ANTHONY W. CARTER  
Senior Legal Examiner

Approved by:  
*[Signature]*  
STEVEN C. SHERMAN  
Enforcement Chief



CONSENT ORDER  
C-14-1568-16-CO01  
Quicken Loans, Inc.

DEPARTMENT OF FINANCIAL INSTITUTIONS  
Division of Consumer Services  
PO Box 41200  
Olympia, WA 98504-1200  
(360) 902-8703

Enforcement Unit  
Division of Consumer Services  
Dept. of Financial Institutions

REC  
APR 18 2016