

STATE OF NEVADA
DEPARTMENT OF BUSINESS AND INDUSTRY
DIVISION OF MORTGAGE LENDING

Before the Commissioner of the Division of Mortgage Lending

In the Matter of:

RED ROCK PARTNERS, LTD.,
Mortgage Company License No. UNL,

and

MICHAEL JABARA,
Mortgage Loan Originator License No. UNL,

Respondents.

Case No. 2023-005

ORDER TO CEASE AND DESIST,
AND NOTICE OF ORDER IMPOSING
ADMINISTRATIVE FINE AND INVESTIGATIVE COSTS,
AND
NOTICE OF OPPORTUNITY FOR ADMINISTRATIVE HEARING

Issued and Entered,
This 6th day of July, 2023,
By Cathy Sheehy,
Commissioner

The Commissioner of the State of Nevada, Department of Business and Industry, Division of Mortgage Lending (“the Commissioner”) having been statutorily charged with the responsibility and authority to administer and enforce Chapter 645B of the Nevada Revised Statutes, NRS 645B.010 *et seq.*¹ (hereinafter, “NRS 645B” or “the Statutes”), and Chapter 645B of the Nevada Administrative Code, NAC 645B.001 *et seq.* (hereinafter, “NAC 645B” or “the Regulations”) (the Statutes and Regulations are collectively, the

¹ This reference is intended to include NRS 645E which provided for a mortgage banker license. In 2017, the Nevada Legislature passed AB 468 (2017) which combined the mortgage banker license with the mortgage broker (changed to mortgage company) license in NRS 645B. NRS 645E expired as of December 31, 2019.

1 “Act”), governing the licensing and conduct of mortgage companies and mortgage loan
2 originators doing business in the State of Nevada; and,

3 The Commissioner is required to conduct investigations as may be necessary to
4 determine whether any person has violated any provision of the Act.

5 Pursuant to that statutory authority and responsibility vested in the
6 Commissioner, and in accordance with provisions of the Act and other applicable law,
7 notice is hereby provided to RED ROCK PARTNERS, LTD. (“Red Rock”), and MICHAEL
8 JABARA (“Jabara”) and/or their affiliates and/or assignees (collectively
9 “RESPONDENTS”), to cease any and all activity as set forth herein and for which
10 licensure is required under the Act until such time as they have obtained a license or
11 exemption from the Nevada Division of Mortgage Lending (“the Division”).

12 I.
13 FACTUAL AND LEGAL BASIS
14 FOR CEASE AND DESIST ORDER AND ORDER IMPOSING
15 ADMINISTRATIVE FINE AND INVESTIGATIVE COSTS

16 The Commissioner finds that there is sufficient factual basis and legal authority to
17 warrant this order as follows.

18 1. NRS 645B.900 prohibits any person from offering or providing any of the
19 services of a mortgage company or mortgage loan originator, to engage in, carry on, or
20 otherwise hold himself or herself out as engaging in or carrying on the business of a
21 mortgage company or mortgage loan originator without first obtaining the applicable
22 license issued pursuant to the Statute unless the person is properly exempt from
23 licensure.

24 2. NRS 645B.0127 defines "mortgage company" and states:

25 (1) “Mortgage company” means a person who, directly or indirectly:

26 (a) Holds himself or herself out for hire to serve as an agent
27 for any person in an attempt to obtain a loan which will be
28 secured by a lien on real property;

- 1 (b) Holds himself or herself out for hire to serve as an agent
2 for any person who has money to lend, if the loan is or will
3 be secured by a lien on real property;
- 4 (c) Holds himself or herself out as being able to make
5 loans secured by liens on real property;
- 6 (d) Holds himself or herself out as being able to buy or sell
7 notes secured by liens on real property; or
- 8 (e) Offers for sale in this State any security which is exempt
9 from registration under state or federal law and purports
10 to make investments in promissory notes secured by liens
11 on real property.

12 3. The Division's investigation specifically found the following:

13 a. RESPONDENTS maintain a business license in Nevada as a Limited
14 Liability Company. Red Rock has been conducting business in Nevada since on or about
15 November 14, 1997. Red Rock is not currently and has at no time relevant to this matter
16 been licensed as a mortgage company in Nevada under the Statute.

17 b. Based upon information and belief, Red Rock conducts its business
18 from 6601 O'Bannon Drive, Las Vegas, Nevada, 89146.

19 c. As reflected in the state-business licensing records of the Nevada
20 Secretary of State ("NSOS"), Jabara serves as the manager of Red Rock. Jabara is not
21 currently and has at no time relevant to this matter been licensed as a mortgage loan
22 originator in Nevada under the Statute.

23 4. On or around August 26, 2021, a complaint was submitted to the Division by
24 Weina Zhang ("Zhang"), the Manager/Owner of Fuyi Properties, LLC ("FUYI"). An
25 investigation was initiated concerning Red Rock and its President/Manager, Jabara,
26 pursuant to NRS 645B.060(2)(c), and determined, from that investigation, that
27 RESPONDENTS were engaged in activity requiring licensure as a mortgage company
28 and mortgage loan originator under the Statute.

5. On or around February 4, 2021, RESPONDENTS sent correspondence to
Zhang and FUYI concerning the intended project and the need for capital and a "Bridge
Loan." The correspondence clearly states that RESPONDENTS are "highly confident that

1 they can place the bridge debt within the required timeframe and at a rate, term length,
2 and conditions that will be acceptable." Mutual business partners introduced the parties.

3 6. On or around February 6, 2021, RESPONDENTS viewed the project, known
4 as The ZLife Hotel, in person, to understand what the client's intentions were, and to see
5 if this was a viable project. RESPONDENTS sent Zhang and FUYI an email
6 correspondence regarding their "working to create" a "teaser to best represent them and
7 properly market this opportunity to the appropriate lenders forthwith." Attached to this
8 correspondence was an Engagement Letter, to hire RESPONDENTS.

9 7. The Engagement Letter was for the RESPONDENTS to solicit lenders and
10 access capital providers, for their intended refinance of the existing property and
11 completion of the intended hotel. The Engagement Letter describes the terms of
12 performance and the understanding of each party of this agreement. This Engagement
13 Letter was not signed by Zhang or any principal of FUYI.

14 8. On or around February 8, 2021, a second draft of the Engagement Letter
15 was sent by RESPONDENTS with changes to the terms requested by Zhang and FUYI.
16 The revised Engagement Letter outlined the services, compensation, and exclusivity
17 rights of RESPONDENTS and was signed by Zhang and FUYI.

18 9. Also, on or around February 8, 2021, RESPONDENTS drafted a Cooperating
19 Advisor Agreement between themselves and CORE Advisory Partners, LLC ("CORE").
20 This agreement was drafted after Zhang and FUYI already engaged RESPONDENTS to
21 perform services as their hired agent. This Cooperating Advisor Agreement further
22 illustrates that RESPONDENTS were hired to solicit, procure, and negotiate financing
23 for the transaction. This agreement also states that "the agreement was entered into
24 solely for the purpose of dividing Success Fees, as that term is clearly defined in the
25 Engagement Agreement, and no other."

26 10. On or around March 18, 2021, RESPONDENTS sent the First Amendment
27 to Engagement Letter dated February 27, 2021, to Anna Olin("Olin"). This version of the
28 Engagement Letter adds in new terms such as: an Equity Finder's Fees, the terms of

1 acceptance of same, and introduces that should an acquiror be sourced to purchase the
2 real property, then the client agrees to pay a real estate commission of 6% to Pacific
3 Group, who is the managing broker of Jabara. The First Amendment to Engagement
4 Letter was signed by Zhang and returned to RESPONDENTS on March 23, 2021.

5 11. On or around May 11, 2021, RESPONDENTS sent their first solicitation to
6 Jarad Schlosser at Stone Hill Strategic Capital to advise of the project and solicit
7 financing for the project. Included in the email correspondence was the project
8 information deck, otherwise known as a "teaser" and the Transitional Debt Financing
9 Summary.

10 12. On or around May 28, 2021, RESPONDENTS began communicating with
11 and sourcing term sheets from David Williams at Bixby Bridge Capital. RESPONDENTS
12 from May 28, 2021 through June 15, 2021, sourced, negotiated and reviewed the term
13 sheets and communicated the terms to FUYI on his own.

14 13. On or around June 15, 2021, Bixby Bridge Capital provided their updated
15 term sheet to RESPONDENTS for review and discussion with his clients. Rates, terms,
16 fees, etc. were all outlined in the letter. RESPONDENTS forwarded the term sheet to
17 Zhang and FUYI for follow-up discussion by email correspondence.

18 14. On or around July 13, 2021, RESPONDENTS began communicating with
19 and sourcing term sheets from Andi Johnson at Reef Capital Partners ("Reef"). The Letter
20 of Interest was addressed to Zhang and was sent through RESPONDENTS for
21 presentation. The term sheet was signed and accepted by Zhang and the principals of
22 FUYI. Zhang and FUYI wired the required \$5,000.00 due diligence deposit to Reef.

23 15. On or around July 14, 2021, after review of the term sheet, Reef also sent
24 further communication to RESPONDENTS, regarding the confidential due diligence that
25 must be taken and a request for a letter of explanation regarding the current funding
26 status of the loan from the existing lender, Capella.

27 16. On or around July 15, 2021, RESPONDENTS requested information from
28 principals of FUYI and continued the discussion on the rates, terms, and fees of the

1 existing financing, with the current lender, Capella. These discussions surrounded the
2 original funding and loan terms, the preparation of a letter of explanation concerning the
3 shortfall of funds, Capella's loan and terms, and the drawdown on the entire project.
4 RESPONDENTS were contacting Capella directly, soliciting them to refinance the
5 current loan on the property. RESPONDENTS were not involved with the original
6 financing that was sourced from Capella back in August of 2019.

7 17. FUYI wired a \$7,500.00 appraisal deposit to Reef on or around July 15, 2021.

8 18. On or around July 20, 2021, RESPONDENTS drafted an analysis model of
9 the 2 loans that were being considered. RESPONDENTS sent this directly by email
10 correspondence to FUYI without any involvement from CORE.

11 19. The principals of FUYI called RESPONDENTS and requested termination of
12 the Reef term sheet and a refund of their \$12,500.00 deposit on or around July 20, 2021.
13 A letter to terminate the agreement with RESPONDENTS was also sent on this date.

14 20. On or around July 26, 2021, RESPONDENTS sent an email correspondence
15 to FUYI stating that they were willing to reduce the fees, cooperate with the refinance
16 offered by Capella, and continue to perform other duties, at no charge through the end of
17 2021.

18 21. After FUYI maintained their request to terminate the agreement with both
19 RESPONDENTS and the prospective lender, Reef, RESPONDENTS emailed invoices to
20 FUYI, demanding payment of the same, totaling \$401,391.00. These fees included Debt
21 Success Fees, Equity Finder's Fees, financing advisory fee, and consulting/advisory fees.

22 22. On or around October 8, 2021, the Division sent correspondence to
23 RESPONDENTS and requested they provide any and all information regarding any
24 mortgage lending activity in Nevada, copies of all advertising materials directed to
25 Nevada businesses/consumers, a list of all loans made and/or arranged on Nevada real
26 property, since the inception of the company through the date of the correspondence, and
27 an explanation as to why the company was operating in an unlicensed capacity. The
28 Division requested a response to their correspondence by October 18, 2021.

1 23. On or around October 21, 2021, a search was conducted by the Division to
2 validate professional licenses held by Red Rock and/or Jabara. The search revealed that
3 Jabara has an inactive FINRA CRD # 4830823 with a Series 7, Series 63, and SIE
4 licenses, he is a licensed broker salesperson with the Nevada Real Estate Division with
5 credential # BS.0065244 issued on April 12, 2005, with an expiration date of April 30,
6 2024, and that he is associated with the Supervising Broker of Pacific Group Real Estate.

7 24. On or around November 3, 2021, Attorney David Carroll provided written
8 correspondence to the Division in response to their October 8, 2021, letter. According to
9 Attorney Carroll, RESPONDENTS serves clients as a financial advisor, no lending
10 activity and no loans were made/arranged by RESPONDENTS, they have no advertising
11 materials to provide, and they do not believe that RESPONDENTS are subject to
12 regulation under NRS 645B. The Division also received documentation with their
13 response letter indicating that the parties are involved in an active arbitration concerning
14 this complaint, with a declaration of Jabara that outlines the case in civil court.
15 Additionally, the proof of the licenses held by Jabara was sent to the Division, in response
16 to the Division's request for information.

17 25. On or around April 12, 2022, Attorney Don Martin sent email
18 correspondence and inquired with the Division on the status of the complaint, as he is co-
19 counsel with Attorney Carroll, representing RESPONDENTS and CORE.

20 26. On or around April 20, 2022, Chief Investigator Jessica Monsour ("JM") sent
21 email correspondence to Attorney Martin to advise that the previously assigned
22 investigator has left the employment of the Division. She also confirmed receipt of the
23 letter dated November 3, 2021, from co-counsel. Finally, she advised Attorney Martin that
24 the Division would be communicating with him shortly once the case had been
25 reassigned.

26 27. On or around April 28, 2022, a letter from the Division was sent to Attorney
27 Martin, in response to his request for a status update concerning this complaint and also
28 the Division's position on the matter. Attorney Martin was advised that it is the

1 Division's understanding that multiple violations of unlicensed activity have taken place,
2 specifically NRS 645B.0127(1)(a). The Division's position was made clear that by
3 RESPONDENTS' own Engagement Letter stating that "Jabara will be performing tasks
4 such as soliciting qualified lenders, negotiating rates, terms, and fees with said lenders,
5 and will assist in all discussions/negotiations, including all matters, as they relate to the
6 facilitation and closing of the referenced transaction." This letter was also sent to co-
7 counsel Attorney Carroll.

8 28. On or around June 1, 2022, Attorney Martin sent a follow-up letter to the
9 Division to dispute facts referenced in the Division's email correspondence dated April 28,
10 2022. The letter implies that RESPONDENTS were only conducting financial advising
11 activities, such as that of a CFO. They state that they do not believe that they violated
12 any part of the act. They also state that all mortgage company activity was done under
13 CORE. They asked for an in-person meeting so they could discuss and provide further
14 documentation on the matter. Also provided was a company profile pamphlet that
15 describes the activity that CORE is involved in and to make it known that CORE was
16 responsible for any brokering/mortgage company activities.

17 29. On or around June 3, 2022, JM replied to Attorney Martin's email
18 correspondence, advising that the Division's position remains unchanged, and if anything,
19 this additional information further supports our findings, that there are multiple
20 violations of unlicensed activity. In this exchange, JM advised that it may be best to
21 proceed with the administrative process, to allow his clients their due process.

22 30. On or around June 3, 2022, Attorney Martin's replied to that email
23 correspondence, appreciating JM's candor, and advising that they would like to keep the
24 meeting scheduled for 9:30 a.m. on June 7, 2022, at his law office.

25 31. On or around June 7, 2022, JM and Investigator Royce Heath ("RH") met
26 with Attorney Martin, RESPONDENTS, and Mr. Francis Abrao from CORE, at Attorney
27 Martin's office. At the meeting it was discovered that Jabara does not have any particular
28 license such as a CPA or Financial Advisor license in the state of Nevada. However,

1 Jabara has a license in Securities and is a licensed real estate agent in the state of
2 Nevada.

3 32. On or around June 8, 2022, JM received email correspondence from Attorney
4 David LeGrand responding to questions concerning his clients, Zhang and Olin.

5 33. On or around June 23, 2022, a meeting request was set for Zhang and Olin
6 to be interviewed at the Division's office by JM and RH at 11:30 a.m. on Tuesday, July 12,
7 2022.

8 34. On July 12, 2022, JM and RH met with Zhang and Olin through their
9 Attorneys LeGrand and Todd Kennedy, here at the Division's office. At this meeting it
10 was discovered that Zhang and Olin understood that Jabara was the one who would be
11 seeking out the lenders, he would contact them after he "negotiated the terms or structured
12 the deal." Additionally, Jabara asserted control over the transaction telling them not to
13 talk with anyone about their financing without his presence. When Jabara informed them
14 of the Reef deal, he informed them if they did not accept the deal, they would lose the
15 property. Jabara informed them that Capella was not interested in refinancing or
16 reorganizing their current loan, wanted to foreclose and take the property back. With this
17 information from Jabara, they felt bullied into accepting the Letter of Intent from Reef.

18 35. Jabara was negotiating with Capella in hopes of refinancing the loan in
19 place by informing Capella of the term sheets he received from other lenders. When
20 Capella found out that Jabara was not licensed they no longer discussed refinancing the
21 loan with him.

22 36. Zhang and FUYI contacted Capella themselves to find all the misinformation
23 they were given by Jabara. Ultimately, they were able to reorganize the loan with
24 Capella, get the additional funding needed to complete the hotel and open on time.

25 37. As stated above, Jabara solicited three different companies to finance the
26 project. The first solicitation was to Jarad Schlosser at Stone Hill Strategic Capital. The
27 second solicitation was to David Williams at Bixby Bridge Capital. The last solicitation
28 was made to Reef. Andi Johnson of Reef sent a letter of interest addressed to Zhang.

1 RESPONDENTS presented the deal with Reef. These acts of solicitation done by
2 RESPONDENTS were to secure a loan secured by a lien on real property are violations of
3 NRS 645B.0127.

4 38. Although RESPONDENTS assert, they were working with or under CORE
5 the Division found that RESPONDENTS are not licensed as a mortgage company or
6 mortgage loan originator with the state of Nevada. Therefore, by providing or offering to
7 provide the services of a mortgage company or mortgage loan originator without having
8 first obtained the applicable license under the Statute, and not being exempt from the
9 licensure requirements, RESPONDENTS are in violation of NRS 645B.900.

10 39. NAC 645B.515 vests in the Commissioner the authority to order a person
11 engaging in activity in violation of the Act to immediately cease and desist from engaging
12 in that activity.

13 40. NRS 645B.690(1)(a) requires the Commissioner to impose an administrative
14 fine of not more than \$50,000.00 on a person who offers or provides any of the services of
15 a mortgage company or mortgage loan originator or otherwise engages in, carries on, or
16 holds himself or herself out as engaging in or carrying on the business of a mortgage
17 company or mortgage loan originator and, at the time the person was required to have a
18 license pursuant to the Statute and the person did not have such a license.

19 41. Any conclusion of law that may be deemed a finding of fact shall be so
20 construed.

21 42. The Commissioner may also assess and collect costs, including attorney fees,
22 against RESPONDENTS in accordance with NRS 645B.070(3).

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1 II.
2 ORDER TO CEASE AND DESIST AND
3 ORDER IMPOSING ADMINISTRATIVE FINE, AND INVESTIGATION COSTS

4 The Commissioner having formed the opinion based upon the foregoing that
5 RESPONDENTS have been and are engaged in unlicensed activities in violation of the
6 Act, and concluded and determined that RESPONDENTS should be ordered to: (1) cease
7 and desist from engaging in any and all activity requiring licensure under NRS 645B; (2)
8 pay an administrative fine; and (3) pay investigative costs.

9 NOW, THEREFORE, IT IS ORDERED that RESPONDENTS shall immediately
10 CEASE and DESIST from holding themselves out as, engaging in, or carrying on any
11 activities that require licensure as a mortgage company under the Act, until such time as
12 they have been granted a license to do so.

13 IT IS FURTHER ORDERED that an ADMINISTRATIVE FINE in the total
14 amount of \$25,000.00 shall be and hereby is imposed in accordance with NRS 645B.690.

15 IT IS FURTHER ORDERED that RESPONDENTS shall be and hereby are
16 assessed the Division's INVESTIGATIVE COSTS in the amount of \$300.00 in accordance
17 with NRS 645B.070(3).

18 IT IS FURTHER ORDERED that an administrative hearing shall be scheduled in
19 this matter only if RESPONDENTS timely request an administrative hearing in
20 accordance with the instructions set forth in Section III and IV below. If no
21 administrative hearing is requested timely, RESPONDENTS shall be deemed to have
22 waived and relinquished the right to an administrative hearing in this matter and a
23 FINAL ORDER shall be issued in this matter.

24 IT IS FURTHER ORDERED that this Order shall be and is effective and
25 enforceable on the date that it is issued and entered, as shown in the caption hereof.

26 IT IS FURTHER ORDERED that this Order shall remain effective and enforceable
27 until terminated, modified, set aside, or suspended in writing by the Commissioner.

28 IT IS FURTHER ORDERED that the Commissioner specifically retains
jurisdiction over the matters contained herein and has the authority to issue such further

1 order(s) as the Commissioner shall deem just, necessary, and appropriate to enforce the
2 Act and protect the public.

3 IT IS SO ORDERED.

4 DIVISION OF MORTGAGE LENDING

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III.

**NOTICE OF OPPORTUNITY FOR ADMINISTRATIVE HEARING
ON CEASE AND DESIST ORDER AND ASSESSMENT OF FINE AND
INVESTIGATIVE COSTS**

NAC 645B.515 authorizes the Commissioner to issue a cease and desist order, subject to the right of RESPONDENTS to request a hearing, as follows:

1. If a person engages in an activity in violation of the provisions of this chapter or chapter 645B of NRS, the Commissioner may issue an order to the person directing the person to cease and desist from engaging in the activity.
2. The order to cease and desist must be in writing and must state that, in the opinion of the Commissioner, the person has engaged in an activity:
 - (a) For which the person has not received a license or certificate of exemption as required by chapter 645B of NRS; or
 - (b) In a manner that violates the provisions of this chapter or chapter 645B of NRS.
3. A person who receives an order to cease and desist pursuant to this section shall not engage in any activity governed by chapter 645B of NRS after receiving the order unless the order is suspended or rescinded.
4. **Not later than 30 calendar days after receiving an order pursuant to this section, the person who receives the order may file a verified petition with the Commissioner to request a hearing.** Upon receipt of the verified petition, the Commissioner may, for good cause shown, suspend the order pending the hearing. The Commissioner will hold the hearing on a date not later than 30 calendar days after the date the petition is filed unless the Commissioner and the person agree to another date. The order to cease and desist is rescinded if the Commissioner fails to:
 - (a) Hold a hearing:
 - (1) Not later than 30 calendar days after the date the petition is filed; or
 - (2) On a date agreed to by the Commissioner and the person; or
 - (b) Render a written decision within 45 days after the date the hearing is concluded.
5. The decision of the Commissioner after a hearing is a final decision of the Division for the purposes of judicial review.

1 **NRS 645B.750 Duty of Commissioner to provide written notice of**
2 **disciplinary action or denial of license; right to administrative**
3 **hearing; entry of final order; appeals.**

- 4 1. If the Commissioner enters an order taking any disciplinary action
5 against a person or denying a person's application for a license, the
6 Commissioner shall cause a written notice of the order to be served
7 personally or sent by certified mail or telegram to the person.
- 8 2. **Unless a hearing has already been conducted concerning the**
9 **matter, the person, upon application, is entitled to a hearing. If**
10 **the person does not make such an application within 20 days**
11 **after the date of the initial order, the Commissioner shall enter a**
12 **final order concerning the matter.**
- 13 3. A person may appeal a final order of the Commissioner in accordance
14 with the provisions of chapter 233B of NRS that apply to a contested
15 case.

16 In addition to the Act, NRS 233B is relevant to the hearing in this matter.

17 **REQUESTING A HEARING**

18 If you wish to exercise your right to an opportunity for administrative hearing,
19 within 20 calendar days (for the administrative fine) or 30 calendar days (for the cease
20 and desist) after receiving this Notice, you must file a verified petition with the
21 Commissioner to request a hearing. A form for such request is provided. The verified
22 petition must be delivered to:

23 **Division of Mortgage Lending**
24 **Attn: Jennifer Hill**
25 **3300 West Sahara Avenue, Suite #285**
26 **Las Vegas, Nevada 89102**

27 If you fail to timely file a verified petition to request a hearing, your right to a hearing to
28 contest this matter will be deemed waived and relinquished and a final order will be
issued and entered in this matter.

STATE OF NEVADA
DEPARTMENT OF BUSINESS AND INDUSTRY
DIVISION OF MORTGAGE LENDING

Before the Commissioner of the Division of Mortgage Lending

In the Matter of:)

RED ROCK PARTNERS, LTD.,)
Mortgage Company License No. UNL,)

Case No. 2023-005

and)

MICHAEL JABARA,)
Mortgage Loan Originator License No. UNL,)

Respondents.)

REQUEST FOR INFORMAL CONFERENCE OR HEARING

In the above-captioned matter, I, _____

_____ hereby request:

An informal conference or

A contested case hearing.

CONTACT INFORMATION

(Provide contact information and initial as applicable)

Home address: _____

Mailing address: _____

Home Phone: _____ Mobile Phone: _____

Office Phone: _____ E-mail Address: _____

1 **COUNSEL CONTACT INFORMATION**

2 Name of Counsel: _____

3 Address: _____

4 _____

5 Office Phone: _____ E-mail Address: _____

6
7 _____ I am not represented by counsel and direct all documents and correspondence
8 regarding this matter to be sent to me at the address represented above.

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10 _____ I am represented by counsel and direct all documents and correspondence
11 regarding this matter to be sent to my counsel of record at the address provided above.

12 (Attorneys must attach and file a notice of appearance with this response.)

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14 _____ I acknowledge that the Order to Cease and Desist is not rescinded by the
15 Commissioner if I request an informal conference and negotiate terms of a settlement of
16 this matter.

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18 Respectfully Submitted,

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