

STATE OF OREGON
DEPARTMENT OF CONSUMER AND BUSINESS SERVICES
DIVISION OF FINANCIAL REGULATION

In the Matter of:

Case No. MSD-24-0061

PNW USED MOBILE HOMES LLC,
Respondent.

FINAL ORDER TO CEASE AND
DESIST, FINAL ORDER
ASSESSING CIVIL PENALTIES,
AND CONSENT TO ENTRY OF
ORDER

The Director of the Department of Consumer and Business Services for the State of Oregon (“Director”), by and through the Division of Financial Regulation (“Division”), investigated the business activities of PNW Used Mobile Homes LLC (“Respondent”) and determined that Respondent violated certain provisions of Oregon Revised Statutes 446.661 *et seq.* and Oregon Administrative Rules (“OAR”) 441-446-0100 through 441-446-0300 (collectively, the “Oregon Manufactured Structure Dealers and Dealerships Law”).

Respondent cooperated with the Division’s investigation and wishes to resolve and settle this matter with the Director.

NOW, THEREFORE, as evidenced by the signature(s) subscribed in this Order, Respondent hereby CONSENTS to entry of this Order upon the Director’s Findings of Fact and Conclusions of Law.

FINDINGS OF FACT

The Director FINDS that:

1. On or about December 6, 2023, the Division received a complaint that Respondent was selling manufactured structures without the required license from the Division.

2. Respondent is a Washington corporation with a principal place of business located at 707 6th St., Ste. C, Prosser, WA 99350. Respondent also operates through its

Division of Financial Regulation
Labor and Industries Building
350 Winter Street NE, Suite 410
Salem, OR 97301-3881
Telephone: (503) 378-4387



1 website www.pnwumh.com.

2 3. Respondent's website listed several manufactured structures located in Oregon
3 that were for sale or had been sold by Respondent. The website also referenced
4 Respondent's ability to sell structures in Washington, Idaho, and Oregon.

5 4. At all times material, neither Respondent nor any of its officers/company
6 principals were licensed as a manufactured structure dealer in Oregon.

7 5. On or about February 17, 2021, Respondent sold a manufactured structure in
8 Oregon for \$18,000, obtaining a consignment fee of \$4,000.

9 6. On or about April 19, 2021, Respondent sold a manufactured structure in
10 Oregon for \$7,500, obtaining a consignment fee of \$0.

11 7. On or about August 17, 2021, Respondent sold a manufactured structure in
12 Oregon for \$45,000, obtaining a consignment fee of \$25,000.

13 8. On or about August 17, 2021, Respondent sold a manufactured structure for
14 \$14,800, obtaining a consignment fee of \$9,800.

15 9. On or about August 30, 2021, Respondent sold a manufactured structure in
16 Oregon for \$22,000, obtaining a consignment fee of \$4,000.

17 10. On or about September 30, 2021, Respondent sold a manufactured structure in
18 Oregon for \$60,000, obtaining a consignment fee of \$10,000.

19 11. On or about May 1, 2022, Respondent sold a manufactured structure in Idaho
20 that was moved to Oregon for \$16,900, obtaining a consignment fee of \$11,900.

21 12. On or about June 30, 2022, Respondent sold a manufactured structure in Oregon
22 for \$56,000, obtaining a consignment fee of \$11,000.

23 13. On or about September 7, 2023, Respondent sold a manufactured structure in
24 Oregon for \$77,500, obtaining a consignment fee of \$7,500.

25 14. On or about October 17, 2023, Respondent sold a manufactured structure in
26 Oregon for \$22,500, obtaining a consignment fee of \$7,500.

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1 CONCLUSIONS OF LAW

2 The Director CONCLUDES that:

3 15. Respondent acted as a manufactured structure dealer on at least nine occasions
4 in Oregon, from approximately February 2021 to October 2023, by selling or offering to
5 sell manufactured structures and by marketing and displaying manufactured structures as
6 for sale, in violation of ORS 446.671(1)(a) and ORS 446.671(1)(b).

7 16. The Director is authorized by ORS 446.995(2) to impose a civil penalty of up
8 to \$5,000 for each manufactured structure improperly sold, brokered, exchanged, or offered
9 or displayed for sale.

10 ORDERS

11 Now therefore, the Director issues the following Orders:

12 17. As authorized by ORS 446.748(1), the Director hereby ORDERS Respondent
13 to CEASE AND DESIST from violating the Oregon Manufactured Structure Dealers and
14 Dealerships Law.

15 18. As authorized by ORS 446.995(2)(a), the Director ORDERS Respondent to pay
16 a total civil penalty of \$9,000 for its violations of ORS 446.671(1).

17 19. The Director SUSPENDS \$4,500 of the CIVIL PENALTY, provided that
18 Respondent complies with these conditions:

- 19 A. Respondent does not violate the Oregon Manufactured Structure
20 Dealers and Dealerships Law; and
21 B. Respondent does not violate the terms of this Consent Order.

22 20. If Respondent satisfies the above conditions for a period of three years after the
23 effective date of this Order, the Director shall waive the \$4,500 suspended portion of the
24 civil penalties. If Respondent fails to satisfy the above conditions during the three-year
25 period following the effective date of this Order, however, the suspended portion of the
26 civil penalties will become immediately due and owing.

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1 21. Along with this Order, Respondent shall submit \$500 to the Director to be
2 applied for the \$4,500 non-suspended civil penalty. Such payment shall be made at the
3 time Respondent signs and returns this Consent Order to the Director.

4 22. Payment towards the remaining non-suspended civil penalty shall be made in
5 the following installments:

6 A. \$500 payment due within 30 days of the date of entry of this Order; and

7 B. Payments of at least \$350 per month, due on the first day of every month
8 for 10 months, starting on November 1, 2025 and ending on August 1, 2026, if not
9 paid in full earlier than such date.

10 23. Respondent agrees that the facts and violations set forth in this Order may be
11 taken as true without further proof in any bankruptcy case (or subsequent litigation) the
12 Division may pursue to enforce its rights under the terms of this Order, and this Order shall
13 have preclusive effect in any such proceeding.

14 24. This Order is a “Final Order” under ORS 183.310(6)(b). Subject to that
15 provision, entry of this Order does not limit the Director’s authority to enforce this Order
16 or take action against Respondent for violations of this Order or violations included in this
17 Order that are discovered after the date of this Order.

18 SO ORDERED this 17th day of October, 2025.

19 SEAN O’DAY, Interim Director
20 Department of Consumer and Business Services

21 /s/ Dorothy Bean

22 Dorothy Bean, Chief of Enforcement
23 Division of Financial Regulation

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1 **ENTITY CONSENT TO ENTRY OF ORDER**

2 I, Ben Naught Jr., am an officer or manager of PNW Used Mobile
3 Homes LLC (“PNW Used Mobile Homes”), and I am authorized to act and sign on its
4 behalf. I have read the foregoing Order, and I know and fully understand the contents
5 hereof. The factual allegations stated herein are true and correct. PNW Used Mobile
6 Homes has been advised of the right to a hearing and of the right to be represented by
7 counsel in this matter. PNW Used Mobile Homes voluntarily consents to the entry of
8 this Order without any force or duress, expressly waiving any right to a hearing in this
9 matter, as well as any rights to administrative or judicial review of this Order. PNW
10 Used Mobile Homes understands that the Director reserves the right to take further
11 action against it to enforce this Order or to take appropriate action upon discovery that
12 PNW Used Mobile Homes has committed other violations of the Insurance Code. PNW
13 Used Mobile Homes, along with its officers, directors, employees, or agents, will fully
14 comply with the terms and conditions stated herein.

15 PNW Used Mobile Homes understands that this Order is a public document.

17 **Signature:** /s/ Ben Naught Jr

18 **Position Held:** Owner

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