

STATE OF OREGON
DEPARTMENT OF CONSUMER AND BUSINESS SERVICES
DIVISION OF FINANCE AND CORPORATE SECURITIES

In the Matter of

Case No. PB-13-0217

ROUND'EM UP PAWN & COINS, LLC;
and PAUL KENNETH LOWERY, JR.;

FINAL ORDER TO CEASE AND
DESIST, ORDER ASSESSING CIVIL
PENALTY, ORDER ASSESSING FEE
FOR EXTRA SERVICE, AND ORDER
REFUSING TO GRANT PAWNBROKER
LICENSE ENTERED BY DEFAULT

Respondents.

PROCEDURAL HISTORY

On October 23, 2013, the Director of the Department of Consumer and Business Services for the State of Oregon (the "Director"), acting under the authority of Chapter 726 of the Oregon Revised Statutes ("ORS") ("the Pawnbrokers Act"), and in compliance with ORS 183.415(3), issued Administrative Order PB-13-0217, ORDER TO CEASE AND DESIST, PROPOSED ORDER ASSESSING CIVIL PENALTY, PROPOSED ORDER ASSESSING FEE FOR EXTRA SERVICE, PROPOSED ORDER REFUSING TO GRANT PAWNBROKER LICENSE AND NOTICE OF RIGHT TO AN ADMINISTRATIVE HEARING ("Notice Order"), to Respondents Round'Em Up Pawn & Coins, LLC ("Round'Em Up") and Paul Kenneth Lowery ("Lowery") (hereinafter referred to collectively as "Respondents").

In accordance with OAR 137-003-0075, the Notice Order designated the Division's file on this matter, including all materials submitted by the Respondents, as the record (the "Record") for the purpose of making a prima facie case in the event that the Director entered a final order against the Respondents by default.

On October 31, 2013, Respondents, through counsel Frederick S. Carman ("Carman"), filed a timely request for an administrative hearing.

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Labor and Industries Building
350 Winter Street NE, Suite 410
Salem, OR 97301-3881
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1 On December 4, 2013, the Oregon Division of Finance and Corporate Securities
2 (“Division”), a division of the Oregon Department of Consumer and Business Services
3 (“DCBS”), referred the hearing request to the Office of Administrative Hearings
4 (“OAH”). The OAH assigned Senior Administrative Law Judge (“ALJ”) Joe L. Allen to
5 preside at hearing.

6 On February 4, 2014, a prehearing conference was convened by ALJ Allen.
7 Assistant Attorney General Joanna Tucker Davis (“AAG Tucker Davis”) represented the
8 Division. Carman appeared for Respondents and notified ALJ Allen and the Division of
9 his intent to withdraw as counsel in the matter. On that same day, Carman filed a written
10 notice of his intent to withdraw as counsel for Respondents because they had not paid a
11 retainer and failed to maintain contact with his office. A second prehearing conference
12 was scheduled for March 7, 2014.

13 On March 7, 2014, neither of the Respondents appeared at the second telephonic
14 prehearing conference. Later that day, Lowery called AAG Tucker Davis and told her
15 that he was in China.

16 On March 11, 2014, ALJ Allen issued a letter identifying the issues for hearing
17 and the relevant dates for the proceeding. The letter also identified a schedule for filing
18 motions for summary determination as well as responsive briefs.

19 On March 20, 2014, the Director issued the **FIRST AMENDED ORDER TO**
20 **CEASE AND DESIST, PROPOSED ORDER ASSESSING CIVIL PENALTY,**
21 **PROPOSED ORDER ASSESSING FEE FOR EXTRA SERVICE, PROPOSED ORDER**
22 **REFUSING TO GRANT PAWNBROKER LICENSE AND NOTICE OF RIGHT TO**
23 **AN ADMINISTRATIVE HEARING (“Amended Notice Order”),** to Respondents.

24 On March 28, 2014, the Division filed a Motion for Summary Determination. On
25 April 18, 2014, the date that Respondents’ responsive briefs were due, Lowery filed a
26 request for extension of time to file his responsive brief. ALJ Allen denied the request for



1 extension of time. On April 18, 2014, Lowery filed a joint response for himself and
2 Round'Em Up.

3 On May 28, 2014, ALJ Allen issued a ruling denying the Division's Motion for
4 Summary Determination. ALJ Allen wrote that while Lowery's joint response did not
5 meet the basic requirements of a legal brief, it did

6 "present sufficient information to draw into question a significant portion
7 of the evidence presented by [the Division]. However, it contains no
8 argument or analysis and fails to comply with the filing guidelines set
9 forth in the prehearing conference follow-up letter. Further, the document
10 submitted fails to address the specific arguments raised by the Division's
11 motion. Instead, Mr. Lowery filed two pages of enumerated 'facts' along
12 with several documents marked as Exhibits[.] * * * If presented at hearing,
13 such filings would be insufficient to carry [Respondents'] burden on any
14 of the issues currently before the ALJ."

11 *Ruling Denying DFCS's Motion For Summary Determination 2* at fn 2.

12 An administrative hearing was scheduled by ALJ Allen to commence at 9:00 AM
13 on June 26, 2014. Exhibits and witness lists were scheduled to be exchanged no later
14 than June 16, 2014.

15 On June 13, 2014, AAG Tucker Davis sent the Division's exhibits and witness
16 lists to the address of record for Respondents in Hillsboro and the mailing was returned
17 as undeliverable. On June 17, 2014, Lowery informed the Division, via email to AAG
18 Tucker Davis, that the exhibits should be sent to an address in Las Vegas, Nevada. AAG
19 Tucker Davis sent the Division exhibits and witness list to the Nevada address. Lowery
20 did not submit exhibits or a witness list to the Division.

21 On the date and time of the scheduled hearing, neither Round'Em Up nor Lowery
22 appeared at the hearing. Lowery sent an email to OAH that requested a continuance. For
23 the reasons set out below, ALJ Allen found, and the Director agrees, that the Respondents
24 had failed to appear at the hearing and that neither party had good cause for not
25 appearing.

26 After a review of the Record, the Director is persuaded that the Record contains

1 facts necessary to support the issuance of this Final Order by Default.

2 Now, therefore, the Director hereby issues the following Findings of Fact,
3 Conclusions of Law and Final Orders.

4
5 I. FINDINGS OF FACT

6 The Director FINDS that:

7 A. Parties

8 1. Round'Em Up Pawn & Coins, LLC is a domestic limited liability company
9 first registered with the Oregon Secretary of State on June 20, 2013, registration No.
10 945586-90. Round'Em Up does business from offices located at 536 SE 10th Avenue,
11 Hillsboro, Oregon 97123. The registered agent of Round'Em Up is listed in the Secretary
12 of State's records as Paul Kenneth Lowery, Jr. Lowery is understood to be Round'Em
13 Up's principal and managing member.

14 B. Background

15 2. The Regional Automated Property Information Database System for Oregon,
16 Washington and other Western states ("NW RAPID") is a computer database system
17 owned and operated by the Portland Police Bureau. It is the system used by pawnbrokers
18 to log transactions to ensure that pawnbrokers are not dealing in stolen property.
19 Pawnbrokers in Hillsboro are required to use the NW RAPID system to record their pawn
20 transactions.

21 3. On August 5, 2013, the Division contacted Lowery and Round'Em Up by
22 letter concerning potential violations of the Pawnbrokers Act, specifically the provisions
23 that prohibit engaging in the business of a pawnbroker without a license and advertising
24 as a pawnbroker without a license. At the time, Round'Em Up was advertising as a
25 pawnshop on their storefront signage which included a sign above the store and a painted
26 sign on the store's front window, both of which using the word "PAWN."





1 4. On August 6, 2013, Lowery responded by telephone to a Division Financial
2 Examiner that he was unaware that Oregon had a licensing requirement for pawnbrokers
3 and indicated that he had been transacting business as a pawnbroker for approximately
4 one week. In a telephone conference call, the Division Financial Examiner and a
5 Division Senior Policy Analyst informed Lowery that operating as a pawn business
6 without a license is subject to the civil penalties outlined in the Pawnbrokers Act.
7 Lowery represented to Division Financial Examiner and the Senior Policy Analyst that he
8 had been involved in approximately 20 unlicensed pawn transactions through August 6,
9 2013. Lowery then stated that Round'Em Up would no longer engage in pawn
10 transactions and would provide the Division with a complete list of all unlicensed pawn
11 transactions through August 6, 2013.

12 5. The Division instructed Lowery to immediately cease all pawn business
13 activities, not collect any fees or interest on the unlicensed pawn transactions, contact all
14 consumers to the pawn transactions to communicate that no fees or interest would be
15 charged, cease all advertisement except for the store signage above or on the store roof,
16 and immediately submit an application for a pawn license. The Senior Policy Analyst
17 informed Lowery that if he agreed to meet each of these terms, the Division would not
18 pursue administrative action on the unlicensed transactions and advertising violations.
19 Lowery orally agreed to the terms outlined above.

20 6. On August 8, 2013, Lowery contacted the Division by email and provided the
21 names of 13 consumers who had engaged in unlicensed pawn transactions with
22 Round'Em Up. Through a follow-up investigation, the Division learned that Lowery and
23 Round'Em Up had engaged in 12 additional unlicensed pawn transactions that were not
24 reported by Lowery in the list provided to the Division on August 8, 2013.

25 7. On August 28, 2013, 22 days after informing the Director that all unlicensed
26 pawn activity would cease, Round'Em Up engaged in an unlicensed pawn transaction



1 with Oregon consumer D.M. of Banks, Oregon. Round'Em Up entered a transaction into
2 NW RAPID as a pledge loan in the amount of \$18 on silver coins. The information
3 entered into NW RAPID, including the descriptor identifying a transaction as a pawn,
4 was made by Lowery or another employee of Round'Em Up.

5 8. On that same day, August 28, 2013, Lowery submitted an incomplete
6 pawnbroker license application to the Division. Among other deficiencies, the forms did
7 not contain information about the required surety bond or irrevocable letter of credit, a
8 certified application page, proof of insurance on inventory, or the required application
9 fee.

10 9. On September 3, 2013, the Division Financial Examiner notified Lowery by
11 email of deficiencies on the application and offered to assist Lowery or answer questions.

12 10. On September 12, 2013, the Division Financial Examiner again notified
13 Lowery by email of additional deficiencies with the incomplete application and offered to
14 assist Lowery or answer questions.

15 11. On September 17, 2013, Lowery emailed the Division Financial Examiner
16 that he would have the bond and insurance paperwork to her "within the next 2 days."
17 The Division Financial Examiner responded to Lowery informing him of the additional
18 deficiencies in the Round'Em Up application.

19 12. On September 23, 2013, 48 days after informing the Director that all
20 unlicensed pawn activity would cease, Round'Em Up engaged in an unlicensed pawn
21 transaction with Oregon consumer H.T. of Hillsboro, Oregon. The NW RAPID system
22 recorded this transaction as a pledge loan in the amount of \$10 on a DVD player/TV.
23 The descriptor entered into NW RAPID identifying the transaction as a pawn was made
24 by Lowery or an employee of Round'Em Up.

25 13. The Division Financial Examiner attempted to contact Lowery on September
26 25 and 30, 2013 to obtain the information necessary to complete the Round'Em Up



1 application. In spite of leaving numerous messages requesting that Lowery contact the
2 Division regarding the deficiencies in the Round'Em Up application, Lowery did not
3 make contact with the Division for 14 days.

4 14. On October 2, 2013, the Senior Policy Analyst contacted Lowery by
5 telephone concerning Round'Em Up's incomplete pawnbroker application. The Senior
6 Policy Analyst requested that Lowery provide the Division with a spreadsheet detailing
7 the current status of pledge loans made prior to being licensed. Lowery stated that he
8 would submit the incomplete portions of the Round'Em Up application and provide a
9 spreadsheet by October 4, 2013. The spreadsheet that Lowery subsequently provided did
10 not provide the requested information, but only updated the entries on two pledge loans
11 that had already been disclosed to the Division. The spreadsheet did not contain any new
12 names or transactions.

13 15. On October 4, 2013, a Division Investigator, having reason to believe that
14 Round'Em Up was operating as a pawnbroker, visited the Round'Em Up business
15 address in Hillsboro. A female employee of Round'Em Up represented to the
16 Investigator that Round'Em Up was in the pawn business and explained the process for
17 obtaining a pledge loan. At no time did the employee inform the Investigator that
18 Round'Em Up was not licensed by the state to conduct a pawn business. The
19 Investigator collected a business card available on the counter that prominently
20 advertised "PAWN" below the name of Round'Em Up.

21 16. On October 8, 2013, 63 days after informing the Director that all unlicensed
22 pawn activity would cease, Round'Em Up engaged in an unlicensed pawn transaction
23 with consumer M.F. of Forest Grove, Oregon. The NW RAPID system recorded this
24 transaction as a pledge loan in the amount of \$39 on jewelry. The descriptor identifying
25 the transaction as a pawn was made by Lowery or an employee of Round'Em Up.

26 17. On October 9, 2013, Lowery submitted additional forms and a payment in an



1 attempt to complete his pawnbroker license application. Lowery did not sign the
2 application certification form.

3 18. On January 8, 2014, a Division Investigator, having reason to believe that
4 Round'Em Up was continuing to advertise as a pawnbroker, visited the Round'Em Up
5 business address in Hillsboro. The Investigator found the front window of the store was
6 still painted to indicate that the business was a pawn business and the sign above the store
7 using the word "PAWN" was still present. Inside the store, the Investigator found
8 business cards available on the counter advertising the business as a pawn store in both
9 English and Spanish.

10 19. On January 27, 2014, a Division Investigator again visited the Round'Em Up
11 business address in Hillsboro. The Investigator found that the store signage using the
12 word "PAWN" was still present.

13 20. Respondents loaned money to 44 Oregon residents, including D.M., H.T. and
14 M.F., at a rate of interest higher than 10 percent per annum on the deposit or pledge of
15 personal property, or purchased personal property on the direct or implied condition of
16 selling it back at a stipulated price that would amount to the payment of interest or
17 consideration in excess of 10 percent per annum.

18 21. On information and belief, Lowery directed, participated in or controlled the
19 pawn transactions executed by Round'Em Up.

20 22. As of March 18, 2014, the Division had not received a complete pawnbroker
21 license application from Lowery or Round'Em Up.

22 23. Round'Em Up has never obtained a pawnbroker's license from the Division.

23 C. Investigation as to Unlicensed Pawn Transactions

24 24. In addition to the work of the Division Investigator described above, the
25 Division engaged in more work to investigate Round'Em Up and Lowery. On October 4
26 and October 10, 2013, the Senior Policy Analyst obtained lists from the NW RAPID



1 system of all transactions entered by Round’Em Up. The lists that the Senior Policy
2 Analyst obtained contained 44 pawn transactions made by Round’Em Up from July 25 to
3 October 8, 2013. Of these transactions, 15 were not reported to the Division at any point
4 in time by Round’Em Up, and three were entered into NW RAPID after Lowery
5 informed the Division that Round’Em Up would cease all pawn activity.

6 25. Each of the 44 transactions described in the NW RAPID report represents
7 unlicensed pawn activity in that each transaction was a loan of money to an Oregon
8 resident at a rate of interest higher than 10 percent per annum on the deposit or pledge of
9 personal property, or the purchase of personal property on the direct or implied condition
10 of selling it back at a stipulated price that would amount to the payment of interest or
11 consideration in excess of 10 percent per annum.

12 D. Investigation as to Unlicensed Pawn Advertising

13 26. During the period from approximately July 25, 2013 to January 27, 2014,
14 Round’Em Up displayed storefront signage advertising as a pawn business prior to
15 receiving a license. The Division allowed Round’Em Up to keep the sign above the store
16 temporarily after August 6, 2013, contingent upon Round’Em Up not engaging in further
17 unlicensed pawn transactions and obtaining a pawnbroker license under Oregon law.

18 27. For the 13-day period of approximately July 25 to August 6, 2013, employees
19 at Round’Em Up answered the business landline phone as “Round’Em Up Pawn.”
20 Lowery was instructed by the Division to cease this form of advertising on August 6,
21 2013.

22 28. On October 4, 2013 and January 8, 2014, a Division Investigator obtained
23 from Round’Em Up advertising in the form of a business card that stated “PAWN” in
24 prominent letters along with contact information for Round’Em Up. This card was
25 displayed on the counter at Round’Em Up’s Hillsboro offices.

26 29. On October 7, 2013, the Senior Policy Analyst executed an internet search of



1 the terms “Round’Em Up” and “pawn” and obtained two advertisements that had been
2 placed by Lowery or employees of Round’Em Up. One advertisement was created on
3 August 5 and expired on August 17, 2013. The second advertisement was placed on
4 August 14, 2013. Both advertisements identify Round’Em Up as a pawn shop located in
5 Oregon and open for business.

6 E. Devoting Extra Time and Attention

7 30. As of October 10, 2013, Division employees devoted at least 20 hours of extra
8 time to investigating the affairs of Round’Em Up and Lowery. The Division employees
9 working on this matter bill their time at \$75 per hour.

10 F. Respondents Failure to Appear at the Hearing and Lack of Good
11 Cause for Failing to Appear

12 31. At 9:00 AM on June 26, 2014, the date and time scheduled for the
13 administrative hearing in this matter, neither of the Respondents appeared at the hearing.

14 32. As an LLC, Respondent Round’Em Up was required to be represented by an
15 attorney licensed to practice law in Oregon. No attorney appeared for Round’Em Up at
16 the date and time scheduled for the hearing. No representative of, or counsel for,
17 Round’Em Up presented any explanation why Round’Em Up was not appearing for the
18 hearing. Round’Em Up presented no good cause reason for not appearing at the hearing.

19 33. Neither Lowery nor an attorney representing him appeared at OAH on the
20 date and time scheduled for the hearing. Respondent Lowery sent an email message to
21 ALJ Allen that was received at OAH at 8:54 AM PDT, just six minutes before the
22 scheduled start of the hearing. The email provided in its entirety:

23 “I just landed in New York and I’m unable to attend today due to my
24 child’s health. I’m flying to Denver to be there for this emergency
25 procedure. I’m in hope Judge Allen will grant a continuation. Sorry for
26 the short notice however my family MUST come first. Paul Lowery”
(Emphasis in original.)

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1 34. Lowery sent no correspondence to the Division or OAH prior to this email
2 indicating that he was flying to New York or Denver, that he had a family emergency or
3 that he otherwise would not be able to attend the hearing. This email consisted of the
4 entire correspondence from Lowery to OAH or the Division regarding this request for
5 continuance. Neither OAH nor the Division received any communication prior to the
6 hearing that Round’Em Up had retained counsel for the hearing.

7 35. ALJ Allen went on the record at the appointed time for the start of the hearing.
8 He found that Respondent Round’Em Up had failed to appear at the hearing. ALJ Allen
9 also concluded that Respondent Lowery had failed to appear at the hearing and that the
10 reasons stated in the email did not constitute good cause for failure to appear at the
11 scheduled hearing. ALJ Allen did not grant the continuance requested by Lowery in the
12 email.

13 36. There was no dispute about Lowery’s reason for not appearing at the hearing.
14 The email establishes that Respondent Lowery never intended to be present at the hearing
15 in Salem, Oregon on June 26, 2014 at 9:00 AM PDT. Irrespective of whether there was a
16 genuine emergency requiring Lowery to be in Denver, Colorado on June 26, 2014;
17 Lowery’s claim of having “just landed” in New York at about 8:54 AM PDT—the time
18 the email was sent to OAH—belies any intention of being present for a hearing in Salem,
19 Oregon at 9:00 AM PDT.

21 II. CONCLUSIONS OF LAW

22 The Director CONCLUDES that:

23 37. Respondent Round’Em Up failed to appear at the hearing and did not have
24 good cause for not appearing. The Director may issue a final order by default against
25 Respondent Round’Em Up in accordance with OAR 137-003-0670.

26 38. Respondent Lowery failed to appear at the hearing. Lowery did not have



1 good cause for not appearing at the scheduled hearing. The reasons for Lowery's failure
2 to appear at the hearing are not in dispute. The Director may issue a final order by
3 default against Respondent Lowery in accordance with OAR 137-003-0670.

4 39. Respondents are persons or corporations who loan money at a higher rate of
5 interest than 10 percent per annum on the deposit or pledge of personal property and are,
6 therefore, pawnbrokers as defined by ORS 726.010(2)(a) and (b).

7 40. Respondents violated ORS 726.040 by acting as a pawnbroker in each of the
8 44 transactions described herein without first procuring a license from the Director. Each
9 pawnbroker transaction is a separate and distinct violation of ORS 726.040.

10 41. Respondents violated ORS 726.040 and OAR 441-740-0045(2) by using store
11 signage, telephone greetings, business cards, and internet advertisements as defined by
12 OAR 441-740-0000(1) that would lead the public to believe that Round'Em Up was a
13 licensed pawnbroker. Each instance of signage, telephone greetings, use of business
14 cards and advertising as a pawnbroker is a separate and distinct violation of ORS
15 726.040.

16 42. Respondents caused the Director's employees to devote extra attention to
17 Respondents' affairs. In accordance with ORS 726.125(3) and OAR 441-740-0010(2)
18 and (3), the Director may assess a person a fee for the expenditure of extra time and
19 attention.

20 21 III. ORDERS

22 Order to Cease and Desist

23 43. The Director, in accordance with the authority of the Pawnbrokers Act,
24 including but not limited to ORS 726.440(1)(a), hereby ORDERS Respondents to
25 CEASE AND DESIST from conducting business as a pawnbroker in the state of Oregon
26 in violation of the Pawnbrokers Act, ORS 726.010 *et seq.*, and accompanying

1 administrative rules.

2 Order Assessing Civil Penalty

3 44. Under the authority of ORS 726.910(1), the Director may assess against any
4 person who violates provisions of the Pawnbrokers Act, or any rule adopted under ORS
5 726.260(1), a CIVIL PENALTY in an amount determined by the Director of not more
6 than \$2,500 per violation.

7 45. In accordance with ORS 726.910(1), the Director hereby ORDERS that
8 Respondents, jointly and severally, are assessed a CIVIL PENALTY in the amount of
9 \$50,000 (fifty thousand dollars) for violation of ORS 726.040 for engaging in 44 business
10 transactions as a pawnbroker without first procuring a license from the Director as
11 provided in the Pawnbrokers Act.

12 46. In accordance with ORS 726.910(1), the Director hereby ORDERS that
13 Respondents, jointly and severally, are assessed a CIVIL PENALTY in the amount of
14 \$17,500 (seventeen thousand five hundred dollars) for violation of ORS 726.040 as
15 follows:

16 A. For using, for a period of at least 77 days, store signage that would lead the
17 public to believe that Round'Em Up was a licensed pawnbroker.

18 B. For using telephone greetings in 13 instances that would lead the public to
19 believe that Round'Em Up was a licensed pawnbroker.

20 C. For using business cards and internet advertisements that would lead the
21 public to believe that Round'Em Up was a licensed pawnbroker.

22 Order Assessing Fee for Extra Service

23 47. Under the authority of ORS 726.125(3), whenever the Director devotes any
24 extra attention to the affairs of a pawnbroker, either upon determination by the Director
25 or upon request of the pawnbroker, a fee for the extra service may be assessed in the
26 amount of the actual cost thereof.





1 48. Division employees devoted at least 20 extra hours to investigating the affairs
2 of Round'Em Up and Lowery. As authorized by OAR 441-740-0010(2), the Division
3 employees working on this matter bill their time at \$75 per hour.

4 49. In accordance with ORS 726.125(3) and OAR 441-740-0010(2), the Director
5 hereby ORDERS that Respondents, jointly and severally, are assessed a fee of \$2,137.50
6 for the actual cost of the extra attention to the affairs of Respondents devoted by the
7 Division in the investigation of this matter.

8 Order Refusing to Grant Pawnbroker License

9 50. In accordance with ORS 726.075(3), the Director may not grant a license to
10 engage in the business of a pawnbroker to any person who has willfully or repeatedly
11 violated or failed to comply with a provision of the Pawnbrokers Act or any
12 administrative rule or order adopted thereunder.

13 51. Respondents have willfully and repeatedly violated ORS 726.040 by engaging
14 in the business of pawnbroker without first procuring a pawnbroker license from the
15 Director.

16 52. Respondents have willfully and repeatedly violated ORS 726.040 by using an
17 assumed business name and advertising that would lead the public to believe that
18 Round'Em Up is a licensed pawnbroker without first procuring a pawnbroker license
19 from the Director.

20 53. In accordance with ORS 726.075(3), the Director ORDERS that Respondents
21 are refused a pawnbroker license because of their willful and repeated violations or
22 failure to comply with the Pawnbrokers Act.

23
24 **IV. AUTHORITY OF THE DIRECTOR TO SEEK OTHER
REMEDIES UNDER OREGON LAW**

25 54. This Order is a "Final Order" under ORS 183.310(6)(b). Subject to that
26 provision, the entry of this Order does not limit other remedies that are available to the

1 Director under Oregon law.

2 Dated this 30th day of June, 2014 at Salem, Oregon.

3 PATRICK M. ALLEN, Director
4 Department of Consumer and Business Services

5 /s/ David Tatman
6 David C. Tatman, Administrator
7 Division of Finance and Corporate Securities

8 NOTICE OF RIGHT TO JUDICIAL REVIEW

9 You are entitled to judicial review of this order. Judicial review may be obtained
10 by filing a petition for review within 60 days from the service of this order. Judicial
11 review is in accordance with ORS 183.482(1) to the Oregon Court of Appeals.

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