

1 ARIZONA DEPARTMENT OF FINANCIAL INSTITUTIONS

2 In the Matter of the Removal and the Prohibition of:

3 No. 06F-BD030-BNK

4 **VICTORIA CERVANTES/P140819**
5 1-32-N-01-015
6 Tents Jail
7 2939 W. Durango Street
8 Phoenix, AZ 85009

**SUPERINTENDENT'S FINAL
DECISION AND ORDER**

Respondent.

9 The Superintendent of Financial Institutions (the "Superintendent") having reviewed the record
10 in this matter, including the Administrative Law Judge Decision attached and incorporated herein by
11 this reference, adopts the Administrative Law Judge's Findings of Fact, Applicable Law, Conclusions
12 of Law and Order.

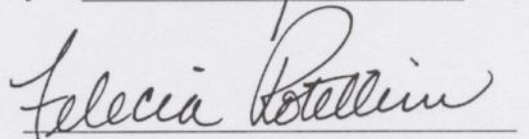
13 ORDER

14 IT IS ORDERED that Respondent is removed from further participation in any manner in the
15 affairs of any financial institution or enterprise in the State of Arizona.

16 NOTICE

17 The parties are advised that, pursuant to A.R.S. § 41-1092.09, this Order shall be final unless
18 Petitioners submit a written motion for rehearing no later than thirty (30) days after service of this
19 decision. The motion for rehearing or review must specify the particular grounds upon which it is
20 based as set forth in A.A.C. R20-4-1219. A copy shall be served upon all other parties to the hearing,
21 including the Attorney General, if the Attorney General is not the party filing the claim of error. In the
22 alternative, the parties may seek judicial review of this decision pursuant to A.R.S. § 41-1092.08(H).

23 DATED this 4th day of May, 2006.

24 
25 Felecia Rotellini
26 Superintendent of Financial Institutions

27 ...

28 ...

1 ORIGINAL filed this 4th day of
May, 2006, in the office of:

2 Felecia Rotellini
3 Superintendent of Financial Institutions
4 Arizona Department of Financial Institutions
5 ATTN: June Beckwith
6 2910 North 44th Street, Suite 310
7 Phoenix, Arizona 85018

8 COPY of the foregoing mailed/hand delivered
9 This same date to:

10 Daniel G. Martin, Administrative Law Judge
11 Office of Administrative Hearings
12 1400 West Washington, Suite 101
13 Phoenix, AZ 85007

14 Craig A. Raby, Assistant Attorney General
15 Office of the Attorney General
16 1275 West Washington
17 Phoenix, AZ 85007

18 Richard A. Fergus, Manager Licensing and Consumer Affairs
19 Arizona Department of Financial Institutions
20 2910 N. 44th Street, Suite 310
21 Phoenix, AZ 85018

22 Robert D. Charlton, Assistant Superintendent
23 Arizona Department of Financial Institutions
24 2910 N. 44th Street, Suite 310
25 Phoenix, AZ 85018

26 AND COPY MAILED SAME DATE by
27 Certified Mail, Return Receipt Requested, to:

28 Victoria Cervantes
7715 West Wolf Street
Phoenix, AZ 85033-1139

Respondent.

BY: June Beckwith

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IN THE OFFICE OF ADMINISTRATIVE HEARINGS

In the Matter of the Removal and
Prohibition of:

No. 06F-BD030-BNK

VICTORIA CERVANTES/P140819
1-32-N-01-015
Tents Jail
2939 W. Durango Street
Phoenix, AZ 85009

**ADMINISTRATIVE
LAW JUDGE DECISION**

Respondent

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HEARING: March 30, 2006

APPEARANCES: Assistant Attorney General Craig Raby represented the Arizona Department of Financial Institutions. Respondent Victoria Cervantes did not appear.

ADMINISTRATIVE LAW JUDGE: Daniel G. Martin

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The Arizona Department of Financial Institutions seeks to remove and prohibit Respondent Victoria Cervantes from participation in the affairs of any financial institution or enterprise in the State of Arizona pursuant to A.R.S. § 6-161. Based on the evidence of record, the Administrative Law Judge makes the following Findings of Fact, Conclusions of Law and Order.

FINDINGS OF FACT

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1. The Arizona Department of Financial Institutions (the "Department") is the duly constituted authority for licensing and regulating financial institutions in the State of Arizona and persons who participate in the affairs of such financial institutions.

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2. At all times relevant hereto, Respondent Victoria Cervantes was employed as an escrow officer at First Financial Title Agency of Arizona ("First Financial"), which holds escrow agent license no. EA 0009514 issued by the Department.

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3. The evidence of record demonstrated that while she worked as an escrow officer for First Financial, Ms. Cervantes engaged in a series of unlawful financial transactions, the details of which are described below.

Office of Administrative Hearings
1400 West Washington, Suite 101
Phoenix, Arizona 85007
(602) 542-9826

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The Morales/Salas Transaction

4. The Morales/Salas transaction involved the purchase of a residence; Arthur Morales was the buyer, and Mary Salas was the seller. Ms. Cervantes served as escrow officer for the transaction. See Exhibits 5a and 19.

5. Mr. Morales is the minor child of Ms. Cervantes.

6. In connection with the Morales/Salas transaction, Ms. Cervantes notarized a deed of trust that contained a forged signature for Mr. Morales.

7. Ms. Cervantes disbursed monies in violation of escrow instructions by issuing unauthorized disbursement checks in the total amount of \$31,683.50 to real estate agent/broker Betty Barbee from escrow proceeds; no escrow instructions existed for Ms. Cervantes to pay Ms. Barbee any fees, commissions or pay-outs from the escrow proceeds.

8. Ms. Cervantes failed to complete the lender's "Identification Verification" forms.

9. At the close of the transaction, Ms. Salas' home was conveyed, without her knowledge, to Mr. Morales. Thereafter, Ms. Salas was evicted from her home.

The Hunt/Chayra Transaction

10. The Hunt/Chayra transaction involved the purchase of a residence; Melissa Hunt was the buyer, and Maria Chayra was the seller. Ms. Cervantes served as escrow officer for the transaction. See Exhibits 5b and 19.

11. In the course of the Hunt/Chayra transaction, Ms. Cervantes disbursed monies in violation of escrow instructions by issuing an unauthorized disbursement check in the amount of \$5,000.00 to real estate agent Carmen Cantu from escrow proceeds; no escrow instructions or other authorization existed for Ms. Cervantes to pay Mr. Cantu any fees, commissions or pay-outs from the escrow proceeds.

The Halaka/Halaka Transaction

12. The Halaka/Halaka transaction involved the purchase of a residence; Anthony Halaka was the buyer, and Albert Halaka was the seller. Ms. Cervantes served as escrow officer for the transaction. See Exhibits 5c and 19.

1 13. In the course of the Halaka/Halaka transaction, Ms. Cervantes disbursed
2 monies in violation of escrow instructions by issuing an unauthorized disbursement
3 check in the amount of \$5,000.00 to Mr. Cantu from escrow proceeds; no escrow
4 instructions or other authorization existed for Ms. Cervantes to pay Mr. Cantu any fees,
5 commissions or pay-outs from the escrow proceeds.

6 The Palafox/Muller Transaction

7 14. The Palafox/Muller transaction involved the purchase of a residence;
8 Anna Palafox was the buyer, and Christina Muller was the seller. Ms. Cervantes served
9 as escrow officer for the transaction. See Exhibits 5d and 19.

10 15. In the course of the Palafox/Muller transaction, Ms. Cervantes disbursed
11 monies in violation of escrow instructions by issuing an unauthorized disbursement
12 check in the amount of \$483.39 to Ms. Barbee from escrow proceeds; no escrow
13 instructions or other authorization existed for Ms. Cervantes to pay Ms. Barbee any
14 fees, commissions or pay-outs from the escrow proceeds.

15 The Estrada/Madraes Transaction

16 16. The Estrada/Madraes transaction involved the purchase of a residence;
17 Miguel Estrada was the buyer, and Rick and Mary Madraes were the sellers. Ms.
18 Cervantes served as escrow officer for the transaction. See Exhibits 5e and 19.

19 17. In the course of the Estrada/Madraes transaction, Ms. Cervantes:

20 a. Disbursed monies in violation of escrow instructions by issuing an
21 unauthorized disbursement check in the amount of \$3,512.00 to Mr. Cantu from
22 escrow proceeds; no escrow instructions or other authorization existed for Ms.
23 Cervantes to pay Mr. Cantu any fees, commissions or pay-outs from the escrow
24 proceeds.

25 b. Disbursed monies in violation of escrow instructions by issuing an
26 escrow disbursement check to Mr. Estrada in the amount of \$36.67, which was
27 \$100.00 less than the amount indicated on the HUD-1 settlement statement.

28 c. Disbursed monies in violation of escrow instructions by issuing an
29 escrow disbursement check to Ms. Madraes in the amount of \$24,894.75, which
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1 was \$7,252.00 less than the amount indicated on the HUD-1 settlement
2 statement.¹

3 The Miranda/Hernandez Transaction

4 18. The Miranda/Hernandez transaction involved the purchase of a residence;
5 Osman Miranda was the buyer, and Jose Hernandez was the seller. Ms. Cervantes
6 served as escrow officer for the transaction. See Exhibits 5f and 19.

7 19. In the course of the Miranda/Hernandez transaction, Ms. Cervantes:

8 a. Failed to obtain and verify photo identification of the escrow parties.

9 b. Disbursed monies in violation of escrow instructions by issuing an
10 unauthorized disbursement check in the amount of \$2,267.90 to Mr. Cantu from
11 escrow proceeds; no escrow instructions or other authorization existed for Ms.
12 Cervantes to pay Mr. Cantu any fees, commissions or pay-outs from the escrow
13 proceeds.

14 c. Disbursed monies in violation of escrow instructions by issuing an
15 escrow disbursement check to Mr. Hernandez in the amount of \$2,000.00, which
16 was \$2,267.90 less than the amount indicated on the HUD-1 settlement
17 statement.

18 The Diaz/Arredondo Transaction

19 20. The Diaz/Arredondo transaction involved the purchase of a residence;
20 Mayara Diaz was the buyer, and Jerry Arredondo was the seller. Ms. Cervantes served
21 as escrow officer for the transaction. See Exhibits 5g and 19.

22 21. In the course of the Diaz/Arredondo transaction, Ms. Cervantes:

23 a. Failed to obtain and verify photo identification of the escrow parties.

24 b. Disbursed monies in violation of escrow instructions by issuing an
25 unauthorized disbursement check in the amount of \$4,360.00 to Mr. Cantu from
26 escrow proceeds; no escrow instructions or other authorization existed for Ms.
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30 ¹ The \$3,512.00 payment to Mr. Cantu accounts for a portion of this shortfall.

1 Cervantes to pay Mr. Cantu any fees, commissions or pay-outs from the escrow
2 proceeds.

3 c. Disbursed monies in violation of escrow instructions by issuing an
4 unauthorized disbursement check in the amount of \$350.00 to Mr. Cantu from
5 escrow proceeds; no escrow instructions or other authorization existed for Ms.
6 Cervantes to pay Mr. Cantu any fees, commissions or pay-outs from the escrow
7 proceeds, and the HUD-1 settlement statement stipulated that Ms. Diaz was to
8 be reimbursed \$350.00 for duplicate appraisal fees.

9 The Quiroga/Stoner Transaction

10 22. The Quiroga/Stoner transaction involved the purchase of a residence;
11 Maria Quiroga was the buyer, and James and Diane Stoner were the sellers. Ms.
12 Cervantes served as escrow officer for the transaction. See Exhibits 5h and 19.

13 23. In the course of the Quiroga/Stoner transaction, Ms. Cervantes:

14 a. Failed to obtain and verify photo identification of the escrow parties.

15 b. Disbursed monies incorrectly by issuing a disbursement check in
16 the amount of \$786.00 to the mortgage broker from escrow proceeds; the
17 disbursement check failed to include the 0.75% loan origination fee in the
18 amount of \$847.50 as set forth on the HUD-1 settlement statement.

19 c. Failed to account properly for escrow property by including the
20 above-referenced \$847.50 in a disbursement check to Ms. Quiroga, which
21 resulted in an overpayment to Ms. Quiroga.

22 d. Disbursed monies incorrectly by issuing a wire-out disbursement to
23 Mr. and Mrs. Stoner in the amount of \$21,122.15, which resulted in a \$50.00
24 overpayment.

25 The Bautista/Gendreau Transaction

26 24. The Bautista/Gendreau transaction involved the purchase of a residence;
27 Joel Bautista was the buyer, and Wade and Jenny Gendreau were the sellers. Ms.
28 Cervantes served as escrow officer for the transaction. See Exhibits 5i and 19.

1 25. In the course of the Bautista/Gendreau transaction, Ms. Cervantes
2 disbursed monies incorrectly by issuing a disbursement check in the amount of \$75.00
3 to The Appraisal House; the payment amount identified in the HUD-1 settlement
4 statement was \$100.00. In consequence of this pay-out, The Appraisal House was
5 underpaid and the sellers (the Gendreaus) received a \$25.00 overpayment.

6 The Juarez/Dittman/Wages Transaction

7 26. The Juarez/Dittman/Wages transaction involved the purchase of a
8 residence; Fernando Juarez was the buyer, and Lisa Dittman and Patrick Wages were
9 the sellers. Ms. Cervantes served as escrow officer for the transaction. See Exhibits 5j
10 and 19.

11 27. Prior to the close of the Juarez/Dittman/Wages transaction, Mr. Juarez's
12 real estate agent canceled the escrow and requested a refund of Mr. Juarez's \$500.00
13 earnest money. Ms. Cervantes issued a disbursement check to Mr. Juarez in the
14 amount of \$500.00, notwithstanding the fact that only one deposit in the amount of
15 \$150.00 had been documented in the escrow file.

16 28. In consequence of Ms. Cervantes' issuance of the \$500.00 disbursement
17 to Mr. Juarez, Ms. Cervantes caused First Financial to incur a loss in the amount of
18 \$350.00.

19 Ms. Cervantes' Criminal Conviction

20 29. On July 19, 2005, an Arizona grand jury issued an indictment charging
21 Ms. Cervantes with: (i) eight counts of Fraudulent Schemes and Artifices, each a Class
22 2 felony, in violation of A.R.S. § 13-2310; (ii) six counts of Taking Identity of Another,
23 each a Class 4 felony, in violation of A.R.S. § 13-2008; (iii) eight counts of Forgery,
24 each a Class 4 felony, in violation of A.R.S. § 13-2002; and (iv) one count of Theft, a
25 Class 2 felony, in violation of A.R.S. § 13-1802. See Exhibit 6. All of the foregoing
26 charges arose out of Ms. Cervantes' activities while employed as an escrow officer at
27 First Financial.

28 30. On December 15, 2005, Ms. Cervantes pleaded guilty to one count of
29 Forgery, a Class 4 felony, in violation of A.R.S. § 13-2002. See Exhibit 14. The count
30 to which Ms. Cervantes pleaded guilty related to the Morales/Salas transaction.

1 31. On January 17, 2006, Maricopa County Superior Court Judge Brian
2 Hauser entered judgment convicting Ms. Cervantes of Forgery, a Class 4 felony. The
3 Court suspended the imposition of sentence and placed Ms. Cervantes on supervised
4 probation for a period of four years, to commence on January 17, 2006. As conditions
5 of probation, the Court ordered that Ms. Cervantes be incarcerated in the Maricopa
6 County Jail for three months and that Ms. Cervantes complete 200 hours of community
7 service. The Court also revoked Ms. Cervantes's commission as a notary public. The
8 remaining charges against Ms. Cervantes were dismissed. See Exhibit 16.

9 The Department's Notice of Hearing and Complaint

10 32. On February 8, 2006, the Department issued a Notice of Hearing and
11 Complaint pursuant to which it alleged that grounds existed pursuant to A.R.S. § 6-161
12 to remove and prohibit Ms. Cervantes from further participation in any manner in the
13 affairs of any financial institution or enterprise. The Department personally served a
14 copy of the Notice of Hearing and Complaint on Ms. Cervantes on February 10, 2006 at
15 the Maricopa County Jail. See Exhibit 17.

16 33. Ms. Cervantes did not appear for hearing (the evidence demonstrated that
17 she had been released from jail prior to the hearing date), nor did Ms. Cervantes
18 contact the Office of Administrative Hearings to state any reason for her absence.
19 When Ms. Cervantes continued in her failure to appear after the expiration of a fifteen
20 minute grace period, the Administrative Law Judge convened the hearing and
21 proceeded in Appellant's absence.

22 34. Because Ms. Cervantes failed to appear for hearing, she offered no
23 evidence to controvert or mitigate the evidence presented by the Department.

24 APPLICABLE LAW

25 1. A.R.S. § 6-161 provides, in pertinent part:

26 A. The superintendent, subject to the requirements of this
27 article, may remove or suspend from office or prohibit from
28 participating in any of the affairs of a financial institution or
29 enterprise any director, officer, employee, agent or other person
30 participating in the conduct of the affairs of the financial institution
or enterprise if he finds that the director, officer, employee, agent or
other person participating in the conduct of the affairs of the

1 financial institution or enterprise has engaged in any of the
2 following:

3 1. Any act, omission or practice in any business transaction
4 which demonstrates personal dishonesty or unfitness to continue in
5 office or participate in the conduct of the affairs of the financial
6 institution or enterprise.

7 * * *

8 4. A conviction of a crime, an essential element of which is
9 fraud, misrepresentation or deceit.

10 * * *

11 6. Any violation of this title relative to the financial institution or
12 enterprise.

13 7. Any act, practice or transaction which in any way would
14 jeopardize the safety and soundness of the financial institution.

15 B. The superintendent may issue and serve upon the person
16 involved, named as respondent, a written notice of the
17 superintendent's order of suspension or intention to remove him
18 from office or to prohibit him from further participation in any
19 manner in the conduct of the affairs of the financial institution or
20 enterprise. A copy of the notice shall also be served on the
21 financial institution or enterprise. The notice shall contain a
22 statement of the alleged facts and fix a time and place at which a
23 hearing shall be held. The hearing shall be fixed for a date not
24 earlier than thirty days nor later than sixty days after the date of
25 service of the notice, unless an earlier or a later date is set for good
26 cause shown. If the respondent without excusable neglect fails to
27 answer the charges, or if on the record made at the hearing the
28 superintendent finds that any of the charges specified in the notice
29 has been established and constitutes grounds for suspension or
30 removal from office or prohibition from participation in the conduct
of the affairs of the financial institution or enterprise, the
superintendent may issue the appropriate order. The order
becomes effective at the time specified in the order after service on
the respondent and remains effective unless stayed, modified,
terminated or set aside by action of the superintendent or a
reviewing court.

C. The resignation, termination of employment or participation,
or separation of the person involved does not affect the jurisdiction

1 and authority of the superintendent to issue any notice and proceed
2 under this section against that person.

3 D. Notwithstanding [A.R.S. § 6-129], an order issued pursuant
4 to this section which has become final is open to public inspection,
5 except that the superintendent may withhold from public inspection
6 for such time as he considers necessary any information which in
7 his judgment the public welfare or the welfare of the financial
8 institution requires to be so withheld.

9 E. If a removal order has become final, a financial institution or
10 enterprise may not employ the person against whom it was issued
11 without the prior written approval of the superintendent.

12 2. A.R.S. § 6-817 provides, in pertinent part:

13 A. The superintendent may . . . suspend or revoke any [escrow
14 agent license] . . . upon the determination by the superintendent
15 that the . . . escrow agent:

16 * * *

17 2. Has not conducted the applicant's or agent's business in
18 accordance with law or has violated this chapter or the rules
19 relating to this chapter.

20 * * *

21 7. Has failed to account properly for escrow property as
22 required by the terms of the escrow.

23 * * *

24 11. Has disbursed monies in violation of escrow instructions.

25 12. Has failed to maintain an adequate internal control structure
26 as prescribed by [A.R.S. § 6-841].

27 3. A.R.S. § 6-834 provides, in pertinent part:

28 A. Unless all of the parties to the escrow otherwise instruct the
29 escrow agent in writing, the escrow agent shall deposit and
30 maintain all monies deposited in escrow to be delivered on the
close of the escrow or on any other contingency in a bank, savings
bank or savings and loan association doing business in this state
and the escrow agent shall keep all of the escrow monies separate,
distinct and apart from monies belonging to the escrow agent.

1 Notwithstanding the parties' instructions to the escrow agent, the
2 escrow agent shall not deposit the escrow monies in an institution
3 outside the United States. When deposited, the monies shall be
4 designated as "escrow accounts" or given some other appropriate
5 designation indicating that the monies are not the monies of the
6 escrow agent. These monies shall be deposited immediately on
7 receipt or as soon thereafter as is reasonably practicable.

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4. A.R.S. § 6-841 provides, in pertinent part:

A. An escrow agent shall adopt a systematic internal control structure to ensure that persons employed by or associated with the escrow agent's business do not make significant errors or perpetuate significant irregularities or fraud without timely detection.

B. For purposes of this section, "internal control structure" means the policies and procedures established to provide reasonable assurance that the escrow agent will achieve the following objectives:

1. Safeguarding of the customers' assets.
2. Reliability in financial reporting.
3. Reliability in recording of all escrow transactions.

5. A.R.S. § 8-841.01 provides, in pertinent part:

A. An escrow agent is the trustee of all monies received or collected and held in escrow. An agent shall not knowingly or negligently commingle trust monies with the escrow agent's own monies or with monies held in any other capacity. Every escrow agent and every officer, director and employee of an escrow agent who has actual knowledge of fraud or dishonesty in the application of escrow monies, owes a fiduciary duty as trustee to the owner of the monies held in escrow.

6. A.A.C. R20-4-702 provides:

An escrow agent shall maintain records to enable the Superintendent to reconstruct the details of each escrow transaction. The records shall include the following:

1. The seller's name and address;
2. The buyer's name and address;
3. The lender's name and address, if any;
4. The borrower's name and address, if any;
5. The real estate agent's name and address, if any;
6. Complete escrow instructions;

- 1 7. Records and supporting documentation for each receipt and
2 disbursement made through the escrow; and
- 3 8. A copy of the escrow settlement.

4 7. A.A.C. R20-4-703 provides:

5 An escrow agent shall preserve the records, books, and accounts
6 pertaining to each escrow transaction for at least three years
7 following the final settlement date of the transaction. An escrow
8 agent may use an electronic recordkeeping system. The
9 Department shall not require an escrow agent to keep a written
10 copy of the records, books, and accounts if the escrow agent can
11 generate all information and copies of documents required by
12 A.R.S. § 6-831 in a timely manner for examination or other
13 purposes.

14 **CONCLUSIONS OF LAW**

15 1. In this administrative proceeding, the Department bears the burden to
16 prove, by a preponderance of the evidence, that grounds exist under A.R.S. § 6-161 to
17 remove and prohibit Ms. Cervantes from participation in the affairs of any financial
18 institution or enterprise in the State of Arizona. See A.A.C. R2-19-119.

19 2. A preponderance of the evidence is "such proof as convinces the trier of
20 fact that the contention is more probably true than not." Morris K. Udall, ARIZONA LAW
21 OF EVIDENCE § 5 (1960).

22 3. The uncontroverted evidence demonstrated that by virtue of her
23 participation in the transactions described above, Ms. Cervantes violated A.R.S. §§ 6-
24 817, 6-834, 6-841 and 6-841.01, and A.A.C. R20-4-702 and R20-4-703, as alleged by
25 the Department in its February 8, 2006 Notice of Hearing and Complaint, and that
26 grounds therefore exist under A.R.S. § 6-161(A)(1), (A)(6) and (A)(7) to remove and
27 prohibit Ms. Cervantes from participation in the affairs of any financial institution or
28 enterprise in the State of Arizona.

29 4. The uncontroverted evidence demonstrated that by virtue of Ms.
30 Cervantes' January 17, 2006 conviction for Forgery, grounds exist under A.R.S. § 6-
161(A)(4) to remove and prohibit Ms. Cervantes from participation in the affairs of any
financial institution or enterprise in the State of Arizona.

1 5. The record contains no evidence that would mitigate against the removal
2 and prohibition of Ms. Cervantes from participation in the affairs of any financial
3 institution or enterprise in the State of Arizona.

4 ORDER

5 On the effective date of the Order entered in this matter, the Department shall
6 remove and prohibit Ms. Cervantes from further participation in any manner in the
7 affairs of any financial institution or enterprise in the State of Arizona.

8
9 Done this day, April 19, 2006.

10
11 
12 _____
13 Daniel G. Martin
14 Administrative Law Judge

15 Original transmitted by mail this 19 day of April, 2006, to:

16 Felecia Rotellini, Superintendent
17 Arizona Department of Financial Institutions
18 ATTN: June Beckwith
19 2910 North 44th Street, Suite 310
20 Phoenix, AZ 85018

21 By Chin Feinleder
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