

**ORDER**

**BEFORE THE ADMINISTRATOR  
STATE OF WISCONSIN  
DEPARTMENT OF FINANCIAL INSTITUTIONS  
DIVISION OF BANKING**

TO: 4Ever Mortgage LLC  
1320 Mendota Street, Suite 119  
Madison, WI 53714  
Respondent

*Sent regular  
mail  
2/25/10.*

**PURPOSE**

1. This is an order issued by the Administrator, State of Wisconsin, Department of Financial Institutions, Division of Banking and directed to respondent.

**JURISDICTION and AUTHORITY**

2. The State of Wisconsin, Department of Financial Institutions, Division of Banking ("division") shall enforce and carry out all laws relating to mortgage bankers, mortgage brokers and loan originators in the State of Wisconsin, and shall enforce and cause to be enforced every law relating to the supervision and control thereof. Ch. 224, subch. III, Stats.

3. Respondent holds a license as a mortgage broker under ch. 224, subch. III, Stats., with the division, license #33855. Respondent is located at the address indicated above.

4. The division may assess against any person who violates ch. 224, subch. III, Stats., a forfeiture of not more than \$25,000 for each violation and may further order restitution to any person suffering loss as a result of the violation. Sec. 224.77(1m), Stats.

5. If the division finds that a mortgage banker, mortgage loan originator, or mortgage broker has violated any provision of ch. 224, subch. III, Stats., or any rule promulgated under this subchapter, the division may deny any application for initial issuance or renewal of a license; revoke, suspend, limit or condition any license; and issue a reprimand. Sec. 224.77(2m), Stats.

6. The division may issue general and special orders, including temporary orders that become immediately effective, to prevent or correct actions by a mortgage banker, mortgage loan originator or mortgage broker that constitutes a violation of any provision of ch. 224, subch. III, Stats., or any rule promulgated under that subchapter. Sec. 224.77(3), Stats.

## FINDINGS

### The division finds as follows:

7. On or about January 27, 2010, the division received a copy of a solicitation letter that respondent sent to a Wisconsin resident. The solicitation letter indicated "4 Ever Mortgage is an approved State Bk/Cross Plains broker." **Ex. 1.**
8. On or about January 29, 2010, the division received a copy of a solicitation letter that respondent sent to a Wisconsin resident. The solicitation letter indicated "4 Ever Mortgage is an approved Anchorbank FSB broker." **Ex. 2.**
9. On or about February 1, 2010, the division received a complaint from a representative of Fox River State Bank, who indicated a previous customer brought in a letter the customer received from respondent that indicated "4 Ever Mortgage is an approved Fox River St Bk broker." **Ex. 3.**
10. On or about February 1, 2010, the division received a complaint from a representative of Gateway Mortgage Corporation who indicated respondent claims that "4 Ever Mortgage is an approved Gateway Mortgage broker." **Ex. 4.**
11. On or about February 5, 2010, the division received a copy of a solicitation letter that respondent sent to a Wisconsin resident. The solicitation letter indicated "4 Ever Mortgage is an approved First Nat'l Cmnty Bk broker." **Ex. 5.**
12. On or about February 5, 2010, the division received a copy of a solicitation letter that respondent sent to a Wisconsin resident. The solicitation letter indicated "4 Ever Mortgage is an approved Bank Of Sun Prairie broker." **Ex. 6.**
13. On or about February 19, 2010, the division received a copy of a solicitation letter that respondent sent to a Wisconsin resident. The solicitation letter indicated "4 Ever Mortgage is an approved University/Wi Cu broker." **Ex. 7.**
14. The solicitation letters referenced in paras. 7, 8, 11, 12, and 13 *supra*, also indicated "Your home loan has gone under review for the Freddie Mac Relief Refinance Mortgage Program. This recent review may enable you to **streamline** your mortgage into a new **30 year fixed interest rate** with a **lower monthly payment.**"
15. Pursuant to s. 224.77(1)(b), Stats., no mortgage broker may make, in any manner, any materially false or deceptive statement or representation.
16. Pursuant to s. 224.77(1)(m), Stats., no mortgage broker may engage in conduct that constitutes improper, fraudulent, or dishonest dealing. Pursuant to s. DFI-Bkg 43.01(1), using or permitting the use of any document which contains erroneous or false information constitutes improper, fraudulent, or dishonest dealing.
17. Respondent violated s. 224.77(1)(b), Stats., by sending solicitation letters that contained materially false or deceptive statements or representations.

18. Respondent violated s. 224.77(1)(m), Stats., by using or permitting the use of solicitation letters that contained erroneous or false information.

### ORDER

#### Based on the foregoing, IT IS HEREBY ORDERED AS FOLLOWS:

19. Respondent shall cease the use of any solicitation letters or other advertising pieces that contain materially false or deceptive statements or representations, or that contain erroneous or false information.

20. Respondent shall, by the close of business on March 12, 2010, mail to each person who received a solicitation letter that contained materially false or deceptive statements or representations, or that contained erroneous or false information, a letter identifying and correcting the materially false or deceptive statements or representations, or erroneous or false information.

21. Before mailing the letter described in para. 20, respondent shall receive division's written approval of the letter.

22. Respondent shall provide to the division by March 12, 2010, a detailed summary of the review it conducted before it advised the individuals who received the solicitation that "Your home loan has gone under review for the Freddie Mac Relief Refinance Mortgage Program. This recent review may enable you to **streamline** your mortgage into a new **30 year fixed interest rate with a lower monthly payment.**"

23. The provisions of this order shall be binding upon respondent and respondent's directors, officers, employees, agents, successors, assigns, and other persons participating in the conduct of its affairs. The provisions of the order shall remain effective and enforceable except to the extent that, and until such time as, any provisions of this order shall have been modified, terminated, suspended, or set aside by the division.

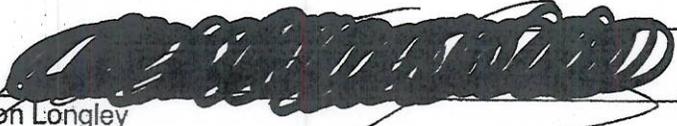
24. The effective date of this Order shall be the date it is served, and service is complete upon mailing. Secs. 227.48(1), Stats., and DFI—Bkg 11.09, Admin. Code.

Dated and mailed at Madison, Wisconsin this 25<sup>th</sup> day of February, 2010.

By:   
Michael J. Mach, Administrator  
Wisconsin Department of Financial Institutions  
Division of Banking  
P.O. Box 7876  
345 W. Washington Avenue, 4<sup>th</sup> Floor  
Madison, WI 53707-7876  
tel. (608) 266-0451  
fax (608) 267-6889

**CONSENT**

Respondent consents to the issuance of the above order, and waives any appeal, review or contest of this order.

  
\_\_\_\_\_  
Aaron Longley

2-23-2016  
\_\_\_\_\_  
Date