

RAÚL R. LABRADOR
ATTORNEY GENERAL

JAMES J. SIMERI
Chief of Consumer Protection Division

AMBER K. KAUFFMAN, ISB No. 10161
Deputy Attorney General
954 W. Jefferson Street, 2nd Floor
Boise, Idaho 83702
Telephone: (208) 947-8733
Facsimile: (208) 334-4151
Email: amber.kauffman@ag.idaho.gov
Attorneys for the Department of Finance

**BEFORE THE DIRECTOR OF THE DEPARTMENT OF FINANCE
OF THE STATE OF IDAHO**

In re Mortgage Loan Originator License
Application of:

ISAAC EDWARD KEER,
NMLS ID No. 1942487,

Applicant.

Docket No. 2025-16-14

**ORDER DENYING MORTGAGE
LOAN ORIGINATOR LICENSE
APPLICATION AND**

NOTICE OF RIGHT TO A HEARING

The Director of the State of Idaho, Department of Finance (“Department”), pursuant to the Idaho Secure and Fair Enforcement for Mortgage Licensing Act, Idaho Code §§ 26-31-301, *et seq.* (the “Act”), hereby issues this Order as to Isaac Edward Keer (“Applicant”).

The Applicant is entitled to a hearing on his qualifications for a license, if a request is made within fifteen (15) days of service of this order. If a request for a hearing is not made within the prescribed period, this order will become final.

FINDINGS OF FACT

1. The Applicant, a resident of the state of Michigan, applied for an Idaho Mortgage Loan Originator (“MLO”) license through the online Nationwide Mortgage Licensing System and

Registry (“NMLSR”) under NMLS ID No. 1942487. This Applicant attested to the information provided and submitted the application on March 6, 2025.

2. The application Form MU4 seeks information on an applicant’s qualifications to be licensed as an MLO, and the “Disclosure Questions” section specifically requests information pertaining to an applicant’s financial, criminal, civil, judicial, and regulatory history.

3. In response to disclosure question F(2), “Are there pending charges against you for any felony?” the Applicant responded, “No.”

4. As part of its regular application review under Idaho Code § 26-31-316, the Department reviewed the Criminal Background Check (CBC) received through the Nationwide Multistate Licensing System (NMLS) from the Federal Bureau of Investigation (FBI) that the Applicant authorized with their Form MU4 application.

5. The CBC results indicated that the Applicant had been arrested by the Troy Michigan Police Department on January 23, 2025 for Felony Burglary.

6. On March 7, 2025, the Department sent a certified letter requiring the Applicant to provide documentation and a signed explanation pertaining to the January 23, 2025 Felony Burglary event listed on the FBI record.

7. On March 14, 2025, the Applicant submitted an amendment through the NMLS to his Form MU4 record to change his disclosure question F(2) response to “Yes.”

8. The Applicant added an Event Explanation Detail entry to the Disclosure Explanations section of his form MU4 to disclose that the Felony Burglary event questioned in the certified letter was an “Ongoing Court Case.” The Applicant also uploaded a letter from his attorney and a copy of the Case Details pertaining to the pending Felony charge in *State of Michigan v. Keer*, Case No. 2025-25-000240-FY in the 52nd District Court, Division 4, Troy.

9. Upon review of the Applicant's amendment, the Department found that the Applicant filed a false application for licensure on March 6, 2025 in failing to initially answer "Yes" to disclosure question F(2). The Department determined that the Applicant disclosed the pending Felony charge only after receiving the certified letter that questioned the Applicant about the Felony event.

10. On March 17, 2025, the Department provided notice of its intent to deny the application based on an inaccurate application. The Applicant was also provided with approximately eight (8) weeks the opportunity to withdraw the application for failure to disclose. The Applicant did not respond.

11. Based upon its investigation, the Department has concluded that the Applicant filed a false attestation on his application by omitting material information.

FINDINGS AND CONCLUSIONS OF LAW

12. The allegations set forth in paragraphs 1 through 11 above are fully incorporated herein by this reference.

13. Idaho Code § 26-31-304 provides that an individual shall not engage in the business of a mortgage loan originator without first obtaining, and maintaining annually, a license.

14. Idaho Code § 26-31-305(1) provides that an applicant for a mortgage loan originator license must apply through the NMLSR in a form required by the Director of the Idaho Department of Finance (Director).

15. Idaho Code § 26-31-306(1)(d) provides that the Director shall not issue a mortgage loan originator license under the Act unless the Director makes a finding that an applicant has demonstrated financial responsibility, character, and general fitness sufficient to command the

confidence of the community and to warrant a determination that the mortgage loan originator will operate honestly, fairly, and efficiently within the purposes of the Act.

16. Pursuant to Idaho Code § 26-31-306(1)(h), before an application for license can be approved, an applicant must provide all information on the application as required per Idaho Code § 26-31-305. Idaho Code § 26-31-305(10) further provides that an applicant shall make complete disclosure of all information as set forth in the application.

17. Pursuant to Idaho Code § 26-31-313(1)(a) and (b), the Director may deny a license if an applicant violates the Act, withholds information or makes a material misstatement in an application for a license.

18. The Applicant made a material misstatement of fact in his application by failing to disclose his pending Felony charge in the Criminal Disclosure and Disclosure Explanation section of his application, which is grounds to deny his application for licensure pursuant to Idaho Code § 26-31-306(1)(d) and (h) and § 26-31-313(1)(a) and (b).

19. The Director finds that Applicant's failure to disclose his pending Felony charge on the Form MU4 demonstrates that the Applicant lacks the appropriate character and fitness sufficient to command the confidence of the community and cannot be warranted to operate honestly, fairly, and efficiently within the purposes of the Act.

20. The Director further finds that due to the Applicant's pending Felony charge, the Applicant has failed to demonstrate the character and general fitness sufficient to command the confidence of the community as required of an MLO. *See* Idaho Code §§ 26-31-306(1)(d)(i) and 26-31-306(1)(d)(iv).

21. The Director cannot make the requisite findings under Idaho Code §§ 26-31-306(1)(d) and 26-31-306(h); therefore, it is appropriate to deny the Applicant's request for an Idaho mortgage loan originator license, pursuant to Idaho Code § 26-31-313(1).

ORDER

NOW, THEREFORE, BASED ON THE FOREGOING FINDINGS OF FACT AND CONCLUSIONS OF LAW, AND PURSUANT TO IDAHO CODE §§ 26-31-313(1)(a) and (b), IT IS HEREBY ORDERED THAT THE APPLICATION FOR A MORTGAGE LOAN ORIGINATOR LICENSE APPLICATION ATTESTED TO AND SUBMITTED BY ISAAC EDWARD KEER NMLS #1942487, ON MARCH 6, 2025, IS DENIED.

NOTICE

A hearing will be granted to the Applicant if a written request for a hearing is received by the Department within fifteen (15) days of the service date of this order.

The written request may be submitted by email to erin.vanengelen@finance.idaho.gov or mailed to the following address:

Attn: Erin Van Engelen
Consumer Finance Bureau Chief
Idaho Department of Finance
P.O. Box 83720
Boise, Idaho 83720-0031

A copy of the request may be copied to the Department's counsel, Amber K. Kauffman, Deputy Attorney General, at amber.kauffman@ag.idaho.gov.

If a hearing is timely requested, the Department will assign the contested case proceeding to the Office of Administrative Hearings pursuant to Idaho Code § 67-5280(2)(a). Proceedings

will be conducted in accordance with the Idaho Administrative Procedure Act, Idaho Code §§ 67-5201 *et seq.* and the Idaho Rules of Administrative Procedure (IDAPA 62.01.01).

Pursuant to Idaho Code § 26-31-305(6), if an appeal is made, the Applicant shall reimburse the Director for her reasonable and necessary expenses incurred as a result of the appeal.

IT IS SO ORDERED.

DATED this 10th day of June 2025.



STATE OF IDAHO
DEPARTMENT OF FINANCE

A handwritten signature in blue ink, appearing to read "Patricia R. Perkins", written over a horizontal line.

PATRICIA R. PERKINS, Director

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on this 10th day of June 2025, I caused a true and correct fully executed copy of the foregoing ORDER DENYING MORTGAGE LOAN ORIGINATOR LICENSE APPLICATION AND NOTICE OF THE OPPORTUNITY TO APPEAL to be served on the following by the designated means:

Isaac Edward Keer
967 Barclay Circle
Rochester Hills, MI 48307

- ☒ U.S. Mail, Postage Paid
- ☒ Certified mail
- ☐ Facsimile
- ☒ Email: isaackeer@yahoo.com



Allen Evaniuck
Paralegal