Bureau of Real Estate
320 West Fourth St. #350
Los Angeles, CA 90013

(213) 576-6982

FILED

JAN 25 2016

BUREAU OF REAL ESTATE

By

BEFORE THE BUREAU OF REAL ESTATE

STATE OF CALIFORNIA

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To:	No. H-04769 SD
SHLC HOLDINGS LLC, dba Secure Horizons Investment Counselors and Universal Relief Advocacy Organization; and TYLER BRENT ZOLLINGER	ORDER TO DESIST AND REFRAIN (B&P Code Section 10086)

The Real Estate Commissioner of the State of California ("Commissioner") has caused an investigation to be made of the activities of SHLC HOLDINGS LLC ("SHLC"), dba Secure Horizons Investment Counselors and Universal Relief Advocacy Organization; and TYLER BRENT ZOLLINGER ("ZOLLINGER"). Based on that investigation, the Commissioner has determined that the above named individual and entity have engaged in, are engaging in, or are attempting to engage in, acts or practices constituting violations of the California Business and Professions Code ("Code"), including acting in the capacity of, advertising and/or assuming to act as real estate brokers in the State of California within the meaning of Code Section 10131(d) (advertising, soliciting borrowers or lenders for or negotiating loans, or collecting payments or performing services for borrowers or lenders or note

owners in connection with loans secured directly or collaterally by liens on real property).

Based on that investigation, the Commissioner hereby issues the following Findings of Fact, Conclusions of Law, and Desist and Refrain Order under the authority of Section 10086 of the Code.

FINDINGS OF FACT

1. SHLC is a limited liability company doing business as Secure Horizons Investment Counselors, and as Universal Relief Advocacy Organization. Neither SHLC nor either of its fictitious business names is licensed by the Bureau of Real Estate ("Bureau") in any capacity.

2. ZOLLINGER is not licensed by the Bureau in any capacity. ZOLLINGER was previously licensed by the Bureau as a real estate salesperson. On or about November 20, 2009, he surrendered his license.

3. Whenever acts referred to below are attributed to SHLC those acts are alleged to have been done by each person named herein, acting alone, or by and/or through one or more agents, associates, affiliates, and/or co-conspirators, including but not limited to each of those named herein, and using a fictitious name(s) unknown at this time.

4. At all times relevant herein, SHLC and ZOLLINGER engaged in the business of, acted in the capacity of, advertised or assumed to act as real estate brokers in the State of California within the meaning of Code Section 10131(d) and 10131.2. These activities included soliciting borrowers to provide mortgage loan and loan modification services, and claiming, demanding, charging, receiving, collecting or contracting for the collection of advance fees within the meaning of Code Sections 10026 and 10085.

5. Beginning in or around October, 2013, and continuing to the present time, SHLC mailed advertisements soliciting distressed borrowers seeking loan modification and foreclosure avoidance services, which advertisements were false, misleading or deceptive, and/or which otherwise created the false impression that the recipients were preapproved for reduction of their mortgage loan payments. Specifically, SHLC mailed out "Payment Reduction

Notifications," stating that specific recipients were, "prequalified for an Economic Advantage Payment and/or Principal Reduction Program," designed to bring house payments current for less than amounts owed and/or reductions in principal balance. The mailers also contained large print headings, including "FORM 012-S Payment Reduction Notification Economic Stimulus 2013," that gave the misleading impression the solicitation was affiliated with or from a government agency, when it was not.

6. In or around October, 2013, consumer Feliciana W. ("Consumer") received a Payment Reduction Notification from SHLC. Consumer called the number on the mailing and spoke with ZOLLINGER who advised Consumer that SHLC could assist her with her mortgage loan. On or about October 28, 2013, Consumer entered into an agreement with SHLC to provide loan modification and related foreclosure avoidance services in exchange for the payment of an advance fee in the amount of $685 per month. Consumer was also put in touch with an individual named Holly Wu who instructed Consumer to sign various forms and to return them to her. Consumer made payments totaling $2,055 over a period of three months, but SHLC failed to provide the agreed upon assistance. Thereafter, Consumer stopped making payments to SHLC.

CONCLUSIONS OF LAW

7. Based on the information contained in Paragraphs 1 through 6, inclusive, above, SHLC and ZOLLINGER performed and/or participated in loan solicitation, negotiation and modification activities as well as advance fee handling which require a real estate broker license under the provisions of Code Sections 10131(d) and 10131.2 during a period of time when neither of them was licensed by the Bureau as a real estate broker nor employed as a real estate salesperson by the broker on whose behalf the activities were performed, all of which is in violation of Section 10130 of the Code.

DESIST AND REFRAIN ORDER

IT IS HEREBY ORDERED THAT SHLC HOLDINGS LLC and TYLER BRENT ZOLLINGER, whether doing business under their own names, or any other names, or any fictitious name, ARE HEREBY ORDERED to immediately desist and refrain from

performing any acts within the State of California for which a real estate broker license is required. In particular each of them is ORDERED TO DESIST AND REFRAIN from:

(i) charging, demanding, claiming, collecting and/or receiving advance fees, as that term is defined in Section 10026 of the Code, in any form, and under any conditions, with respect to the performance of loan modifications or any other form of mortgage loan forbearance service in connection with loans on residential property containing four or fewer dwelling units (Code Section 10085.6); and

(ii) charging, demanding, claiming, collecting and/or receiving advance fees, as that term is defined in Section 10026 of the Code, for any other real estate related services offered by them to others.

DATED: January 15, 2016

WAYNE S. BELL
REAL ESTATE COMMISSIONER

By: _____
JEFFREY MASON
Chief Deputy Commissioner

Notice: Business and Professions Code Section 10139 provides that "Any person acting as a real estate broker or real estate salesperson without a license or who advertises using words indicating that he or she is a real estate broker without being so licensed shall be guilty of a public offense punishable by a fine not exceeding twenty thousand dollars ($20,000), or by imprisonment in the county jail for a term not to exceed six months, or by both fine and imprisonment; or if a corporation, be punished by a fine not exceeding sixty thousand dollars ($60,000)."

cc: SHLC Holdings LLC
Tyler Brent Zollinger