FILED

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DEPARTMENT OF REAL ESTATE
BY: _____

Department of Real Estate
320 West 4th Street, Suite 350
Los Angeles, California 90013-1105

Telephone: (213) 576-6982

BEFORE THE DEPARTMENT OF REAL ESTATE

STATE OF CALIFORNIA

* * *

To:	NO. H-38718 LA
ALL CITIES USA, INC., SARAH LAFLIN, and ROBERT LAFLIN.	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 ALL CITIES USA, INC., SARAH LAFLIN, and ROBERT LAFLIN. Based on that investigation, the Commissioner has determined that ALL CITIES USA, INC., SARAH LAFLIN, and ROBERT LAFLIN 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 engaging in the business of, acting in the capacity of, advertising, or assuming to act, as real estate brokers in the State of California within the meaning of Section 10131(d) (soliciting borrowers or lenders or negotiating loans) and Section 10131.2 (advance fee handling) without being properly licensed.

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. ALL CITIES USA, INC. ("ALL CITIES") is not presently and has never been licensed by the Department in any capacity. ALL CITIES is a Nevada corporation registered with the California Secretary of State to do business in California. ROBERT LAFLIN is the CEO and agent for service of process for ALL CITIES, which maintains corporate offices located at 31878 Del Obispo St., Suite 459, San Juan Capistrano, CA 92675.

2. ROBERT LAFLIN is not presently and has never been licensed by the Department in any capacity. ROBERT LAFLIN is the owner and CEO of ALL CITIES. In addition, ROBERT LAFLIN is the registered owner of the fictitious business name All Cities USA. According to the fictitious business name statement registered with the Orange County Recorders office. All Cities also maintains offices located at 27742 Paseo Esteban, San Juan Capistrano, CA 92675.

3. SARAH LAFLIN, aka Sara Lea, aka Sarah Ann Talley, is not presently licensed by the Department. SARAH LAFLIN, formerly known as Sarah Ann Talley, was licensed by the Department as a real estate salesperson from September 26, 2000 through October 1, 2002, at which time her salesperson license was revoked. SARAH LAFLIN has not been licensed by the Department in any capacity since October 1, 2002.

4. The parties and entities listed above have also engaged in real estate activities under numerous other business names including, but not limited to, the following unlicensed business names:

(a) www.allcitiesusa.com

(b) All Cities USA

(c) newhope4homes.com

5. All further references to "Respondents" include the individuals and entities listed in Paragraphs 1 through 4 above, and also include the officers, directors, employees, and agents employed by or associated with said individuals and entities, who at all times were engaged in the furtherance of the businesses or operations of the individuals and entities, and who were acting within the course and scope of their authority and employment.

6. Beginning on or around January 1, 2009, and continuing through the present time, Respondents, operating as ALL CITIES USA, have engaged in the business of providing loan modification, short sale and foreclosure avoidance services to homeowners nationwide.

7. Respondents advertised in media, through flyers and on the internet, including through a website at www.allcitiesusa.com, soliciting borrowers in distress, offering foreclosure avoidance, short sale and loan modification services in exchange for a fee.

8. On November 29, 2010, Respondents, through the ALL CITIES USA internet website http://allcitiesusa.com solicited borrowers facing foreclosure and offered to negotiate on their behalf with lenders to obtain a loan modification and/or otherwise help them save their homes for a "flat fee."

(a) In its promotional materials, ALL CITIES USA stated that:

"There are only two types of companies that can legally assist you in your loan modification, one is an attorney based company and the other is a Real Estate lending company that is registered with an approved by the Department of Real estate to process loan modifications."

(b) Neither ALL CITIES USA nor SARA LAFLIN were at that time, or have

become since that time, attorneys or licensed by the California Department of Real Estate. Nonetheless, ALL CITIES USA stated that, "...our attorneys at All Cities USA have the knowledge and experience that may help you reduce your mortgage payment, reduce your interest rate, reduce your loan principal, and save your home...We provide an affordable, caring and qualified service for a one-time flat fee."

9. Beginning on or before March 24, 2011, Respondents advertised on You Tube through infomercial videos. Those videos depicted Respondent SARAH LAFLIN representing distressed homeowners in California, negotiating with lenders on their behalf in attempts to obtain a loan modification and prevent foreclosure. Examples of California residents represented by ALL CITIES and Respondent SARAH LAFLIN included Bob K. and Peter S.

CONCLUSIONS OF LAW

The conduct, acts and/or omissions of ALL CITIES USA, SARAH LAFLIN, and ROBERT LAFLIN., in advertising, soliciting, and negotiating on behalf of borrowers for or in expectation of compensation, and collecting fees in connection therewith when they were not licensed by the Department, was in violation of Code Section 10130.

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DESIST AND REFRAIN ORDER

Based on the Findings of Fact and Conclusions of Law stated herein, it is hereby ordered that ALL CITIES USA, SARAH LAFLIN, and ROBERT LAFLIN, whether doing business under their own names, or any other names, or any fictitious names, 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) soliciting borrowers and/or performing services for borrowers or lenders in connection with loans secured directly or collaterally by one or more liens on real property, and

(ii) charging, demanding, claiming, collecting and/or receiving a fee for any of the services offered by them to others, unless and until you obtain a real estate broker license issued by the Department, and until you demonstrate and provide evidence satisfactory to the Commissioner that you are in full compliance with all of the requirements of the Code and Commissioner's Regulations relating to charging, collecting, and accounting for fees.

DATED: 2/5/13

Real Estate Commissioner

By AWET P. KIDANE
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: ALL CITIES USA, INC.
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