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1 DEPARTMENT OF REAL ESTATE  
2 320 West Fourth Street, Ste. 350  
3 Los Angeles, California 90013  
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6  
7  
8 Telephone: (213) 576-6982

FILED  
JAN 25 2010  
DEPARTMENT OF REAL ESTATE  
By C.A.

STATE OF CALIFORNIA  
DEPARTMENT OF REAL ESTATE

11	To:	)	NO. H-36421 LA
		)	
12	NABILE JOHN ANZ, doing business as	)	<u>AMENDED ORDER</u>
	Federal Loan Modification, LLP;	)	<u>TO DESIST AND REFRAIN</u>
13	Federal Loan Modification, LLC;	)	(B&P Code Section 10086)
	Federal Loan Modifications;	)	
14	Federal Loan Modification;	)	
	Federal Loan Modification Law Center, LLP;	)	
15	Federal Loan Modification Law Center;	)	
	FLM Law Center; Anz & Associates, PLC;	)	
16	and/or any other name or fictitious business	)	
	name used by Nabile John Anz;	)	
17	BOAZ MINITZER; PATTI ABARCA;	)	
18	TRACEY L. COZZETTO; LEON MIRASOL;	)	
	JUAN SANCHEZ; SHAWN JABER; LAURA	)	
19	CHOI; ERIN NEVINSON; JOSHUA REED;	)	
	ALAN ALEXANDER; ARASH KAHAIRI;	)	
20	RANDY JACKSON; MEGAN EUBANK;	)	
	ADAM STERN; MICHAEL TRENT;	)	
21	NICK M. MARTINEZ; STEFFANIE HEIDEN;	)	
22	SEAN ELLIS; DIMITRI LUJAN;	)	
	MARIELLE EPSTEIN and	)	
23	DARRYL WASHINGTON.	)	
24		)	

1           The Order to Desist and Refrain filed on January 13, 2010, is hereby amended to  
2 add the Case Number H-36421 LA.

3           The Commissioner (Commissioner) of the California Department of Real Estate  
4 (Department) caused an investigation to be made of the activities of NABILE JOHN ANZ  
5 (ANZ); BOAZ MINITZER; PATTI ABARCA; TRACEY L. COZZETTO; LEON MIRASOL;  
6 JUAN SANCHEZ; SHAWN JABER; LAURA CHOI; ERIN NEVINSON; JOSHUA REED;  
7 ALAN ALEXANDER; ARASH KAHAIRI; RANDY JACKSON; MEGAN EUBANK; ADAM  
8 STERN; MICHAEL TRENT; NICK M. MARTINEZ; STEFFANIE HEIDEN; SEAN ELLIS;  
9 DIMITRI LUJAN; MARIELLE EPSTEIN; and DARRYL WASHINGTON.

10           Whenever acts referred to below are attributed to ANZ, those acts are alleged to  
11 have been done by ANZ, acting by himself, or by and/or through one or more agents, associates,  
12 affiliates, and/or co-conspirators, including, but not limited to, BOAZ MINITZER; PATTI  
13 ABARCA; TRACEY L. COZZETTO; LEON MIRASOL; JUAN SANCHEZ; SHAWN JABER;  
14 LAURA CHOI; ERIN NEVINSON; JOSHUA REED; ALAN ALEXANDER; ARASH  
15 KAHAIRI; RANDY JACKSON; MEGAN EUBANK; ADAM STERN; MICHAEL TRENT;  
16 NICK M. MARTINEZ; STEFFANIE HEIDEN; SEAN ELLIS; DIMITRI LUJAN; MARIELLE  
17 EPSTEIN; and DARRYL WASHINGTON, and using the names "Federal Loan Modification,  
18 LLP," "Federal Loan Modification, LLC," "Federal Loan Modifications," "Federal Loan  
19 Modification," "Federal Loan Modification Law Center, LLP," "Federal Loan Modification Law  
20 Center," "FLM Law Center," "Anz & Associates, PLC," and/ or other names or fictitious names  
21 unknown at this time.

22           Based on that investigation, the Commissioner has determined that ANZ has  
23 engaged in, is engaging in, or is attempting to engage in, acts or practices constituting violations  
24 of the California Business and Professions Code (Code) and/or Title 10, Chapter 6, California  
25 Code of Regulations (Regulations). ANZ is engaging in the business of, acting in the capacity  
26 of, and/or advertising or assuming to act as, a real estate broker in the State of California within  
27 the meaning of Section 10131(d) (performing services for borrowers in connection with loans

1 secured by real property) and Section 10131.2 (charging or collecting an advance fee in  
2 connection with obtaining a loan on real property) of the Code. Furthermore, based on the  
3 investigation, the Commissioner hereby issues the following Findings of Fact, Conclusions of  
4 Law, and Desist and Refrain Order under the authority of Section 10086 of the Code.

5 FINDINGS OF FACT

6 Licensees

7 1. ANZ is presently licensed and/or has license rights under the Real Estate Law  
8 as a real estate broker.

9 2. TRACEY L. COZZETTO, is presently licensed and/or has license rights  
10 under the Real Estate Law as a real estate broker.

11 3. STEFFANIE HEIDEN and MARIELLE EPSTEIN, are presently licensed  
12 and/or have license rights under the Real Estate Law as real estate salespersons.

13 Unlicensed Fictitious Business Name Usage

14 4. Use of a fictitious business name for activities requiring the issuance of a real  
15 estate license requires the filing of an application for the use of such name with the Department  
16 in accordance with the provisions of Section 10159.5 of the Code.

17 5. ANZ has been licensed by the Department as a real estate broker since  
18 April 12, 1991. ANZ has no current fictitious business names listed under his real estate broker  
19 license.

20 6. "Federal Loan Modification, LLP," "Federal Loan Modification, LLC,"  
21 "Federal Loan Modifications," "Federal Loan Modification," "Federal Loan Modification Law  
22 Center, LLP," "Federal Loan Modification Law Center," "FLM Law Center," and "Anz &  
23 Associates, PLC" have never been licensed by the Department in any capacity.

24 7. During a period of time from approximately May of 2008 to the present time,  
25 ANZ, while doing business as "Federal Loan Modification, LLP," "Federal Loan Modification,  
26 LLC," "Federal Loan Modifications," "Federal Loan Modification," "Federal Loan Modification  
27 Law Center, LLP," "Federal Loan Modification Law Center," "FLM Law Center," "Anz &

1 Associates, PLC” and/or other names or fictitious names unknown at this time, acted in the  
2 capacity of, advertised or assumed to act as a real estate broker in the State of California, within  
3 the meaning of Sections 10131(d) and 10131.2 of the Code, for or in expectation of  
4 compensation.

5 8. For an unknown period of time beginning no later than May 2008, and  
6 continuing to the present time, ANZ advertised, and continues to advertise, his services under  
7 one or more business names including, but not limited to, "Federal Loan Modification, LLP,"  
8 "Federal Loan Modification, LLC," "Federal Loan Modifications," "Federal Loan  
9 Modification," "Federal Loan Modification Law Center, LLP," "Federal Loan Modification Law  
10 Center," "FLM Law Center," "Anz & Associates, PLC," in various print and electronic media,  
11 including a website located at <http://www.fedmod.com>. Those advertisements solicited, and  
12 continue to solicit, borrowers offering loan modification services.

13 9. ANZ, while doing business as the fictitious names listed in Paragraphs 7 and  
14 8 above, engaged in the business of claiming, demanding, charging, receiving, collecting or  
15 contracting for the collection of an advance fee, as defined by Section 10026 of the Code,  
16 including but not limited to, the activities described in Paragraphs 14 through 24, below.

17 10. ANZ, while doing business as the fictitious names listed in Paragraphs 7 and  
18 8 above, failed to submit the advance fee agreements and advertising referred to in Paragraphs  
19 14 through 23, below, to the Commissioner ten days before using them.

20 11. ANZ solicited and represented borrowers in negotiating, refinancing, and  
21 obtaining mortgage loans. ANZ acted without Department authorization in using the afore-  
22 mentioned fictitious business names to engage in activities requiring the issuance of a real estate  
23 license in violation of Section 10159.5 of the Code and Regulation 2731.

24 Employment and/or Compensation of Unlicensed Persons

25 12. BOAZ MINITZER; PATTI ABARCA; LEON MIRASOL; JUAN  
26 SANCHEZ; SHAWN JABER; LAURA CHOI; ERIN NEVINSON; JOSHUA REED; ALAN  
27 ALEXANDER; ARASH KAHAIRI; RANDY JACKSON; MEGAN EUBANK; ADAM

1 STERN; MICHAEL TRENT; NICK M. MARTINEZ; SEAN ELLIS; DIMITRI LUJAN and  
2 DARRYL WASHINGTON are not now, and have never been, licensed by the Department in any  
3 capacity.

4 13. ANZ employed and/or compensated individuals including those named  
5 herein, who were not licensed as real estate salespersons or as real estate brokers to perform  
6 some or all of the services alleged in Paragraphs 14 through 24, below in violation of Section  
7 10137 of the Code.

8 14. During the period of time from approximately May 2008 to the present time,  
9 ANZ solicited borrowers and negotiated to do one or more of the following acts for another or  
10 others, for or in expectation of compensation: negotiate one or more loans for, or perform  
11 services for, borrowers and/or lenders in connection with loans secured directly or collaterally by  
12 one or more liens on real property; and charge, demand or collect an advance fee for any of the  
13 services offered.

14 Francisco Arzate and Gloria Arzate transaction

15 15. On or about May 12, 2008, ANZ, doing business as Federal Loan  
16 Modification Law Center, entered into an agreement with Francisco Arzate and his mother  
17 Gloria Arzate to handle the refinance of the Arzate's real property located at 1238 Wingate  
18 Place, Pomona, California 91768. The Arzates dealt with Federal Loan Modification Law  
19 Center representative Patti Abarca. ANZ failed to perform the services promised.

20 Patricia Peters transaction

21 16. On or about October 21, 2008, ANZ, doing business as Federal Loan  
22 Modification ("FLM"), entered into a loan modification agreement with Patricia Peters.  
23 Pursuant to the terms of the written fee agreement, Ms. Peters paid an advance fee of \$2,995 and  
24 FLM was to submit a loss mitigation package and negotiate the terms of Ms. Peters' residential  
25 mortgage loan with her lender regarding real property located at 25035 Peppertree Court,  
26 Corona, California 92883. Ms. Peters dealt with FLM representatives Shawn Jaber and Laura  
27

1 Choi. ANZ failed to perform the services promised or to obtain a loan for Ms. Peters on more  
2 favorable terms.

3 John Carr transaction

4 17. On or about January 12, 2009, ANZ, doing business as FLM Law Center,  
5 LLP, entered into a loan modification agreement with John Carr. Pursuant to the terms of the  
6 written agreement, Mr. Carr paid an advance fee of \$2,995 and FLM was to negotiate the terms  
7 of his first and second mortgage loans on real property located at 610 E. Mansfield, Pontiac,  
8 Michigan 48340. Mr. Carr dealt primarily with FLM Law Center, LLP representative Darryl  
9 Washington. ANZ failed to perform the services promised or to obtain a loan for Mr. Carr on  
10 more favorable terms.

11 Verneen and Arnold Sutherland transaction

12 18. On or about January 12, 2009, ANZ, doing business as FLM Law Center,  
13 LLP, entered into a loan modification agreement with Verneen and Arnold Sutherland. Pursuant  
14 to the terms of the written agreement, the Sutherlands paid an advance fee of \$4,190 and FLM  
15 was to negotiate the terms of their first and second mortgage loans on real property located at  
16 15180 N.E. 16<sup>th</sup> Ave., North Miami Beach, Florida 33162. The Sutherlands dealt primarily with  
17 FLM Law Center, LLP representatives Tracey Cozzetto, Leon Mirasol and Juan Sanchez. ANZ  
18 failed to perform the services promised or to obtain a loan for the Sutherlands on more favorable  
19 terms.

20 Lloyd V. Morris transaction

21 19. On or about January 15, 2009, ANZ, doing business as FLM Law Center,  
22 LLP, entered into a loan modification agreement with Lloyd V. Morris. Pursuant to the terms of  
23 the agreement, Mr. Morris paid an advance fee of \$4,190 and FLM Law Center, LLP was to  
24 negotiate the terms of Mr. Morris' first and second mortgages on real property located at 943  
25 Rancho Roble Way, Sacramento, California 95834. Mr. Morris dealt primarily with FLM Law  
26 Center, LLP representatives Erin Nevinson and Joshua Reed. ANZ failed to perform the services  
27 promised or to obtain a loan for Mr. Morris on more favorable terms.

1 Joaquin Gutierrez transaction

2           20. On or about January 28, 2009, ANZ, doing business as FLM Law Center,  
3 LLP, entered into a loan modification agreement with Joaquin Guitierrez. Pursuant to the terms  
4 of the written agreement, Mr. Gutierrez paid an advance fee of \$3,500 and FLM was to negotiate  
5 the terms of his mortgage loan on real property located at 1024 Wernli Court, Arvin, California  
6 93203. Mr. Gutierrez dealt primarily with FLM Law Center, LLP representative Marielle  
7 Epstein. ANZ failed to perform the services promised or to obtain a loan for Mr. Gutierrez on  
8 more favorable terms.

9 Brian McCammond transaction

10           21. On or about February 19, 2009, ANZ, doing business as FLM, also known as  
11 Federal Loan Modification Law Center, LLP, entered into a loan modification agreement with  
12 Brian McCammond. Pursuant to the terms of the written fee agreement, Mr. McCammond paid  
13 an advance fee of \$4,190 and FLM was to negotiate the terms of Mr. McCammond's first and  
14 second mortgage loans on his residential property located at 323 N. 3<sup>rd</sup> Street, Los Banos,  
15 California 93635. Mr. McCammond dealt primarily with FLM representative and case evaluator  
16 Alan Alexander and Supervisor Arash Kahairi. ANZ failed to perform the services promised or  
17 to obtain a loan for Mr. McCammond on more favorable terms.

18 Rosemary De La Rosa transaction

19           22. On or about March 11, 2009, ANZ, doing business as FLM, entered into a  
20 loan modification agreement with Rosemary De La Rosa. Pursuant to the terms of the written  
21 agreement, Ms. De La Rosa paid an advance fee of \$1,000 and FLM was to negotiate the terms  
22 of Ms. De La Rosa's mortgage on real property located at 820 Stone Pine Way, Modesto,  
23 California 95351. Ms. De La Rosa dealt primarily with FLM representatives Randy Jackson,  
24 Megan Eubank, Adam Stern, Michael Trent, and Supervisor Arash Kahairi. ANZ failed to  
25 perform the services promised or to obtain a loan for Ms. De La Rosa on more favorable terms.

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1 Edna L. Paule and Danilo L. Paule transaction

2           23. On or about April 3, 2009, ANZ, doing business as FLM Law Center, LLP,  
3 entered into a loan modification agreement with Edna L. Paule and Danilo L. Paule. Pursuant to  
4 the terms of the written agreement, the Paules paid an advance fee of \$995 for negotiation of a  
5 first mortgage on real property located at 7701 Man O War Street, Las Vegas, Nevada 92618.  
6 The Paules dealt primarily with FLM Law Center, LLP representatives Nick M. Martinez,  
7 STEFFANIE Heiden and Sean Ellis. ANZ failed to perform the services promised or to obtain a  
8 loan for the Paules on more favorable terms.

9 Edward Lee Roy Burton transaction

10           24. On or about May 1, 2009, ANZ, doing business as Federal Loan Modification  
11 Law Center ("FLMC"), entered into a loan modification agreement with Edward Lee Roy  
12 Burton. Pursuant to the terms of the written fee agreement, Mr. Burton would pay an advance  
13 fee of \$995 and FLMC was to negotiate the terms of Mr. Burton's residential mortgage loan for  
14 real property located at 8469 Sierra Madre Street, Rancho Cucamonga, California 91730. Mr.  
15 Burton made numerous telephone calls in an attempt to reach ANZ. He never had any of his  
16 messages returned. Mr. Burton dealt with FLMC representative and case evaluator, Dimitri  
17 Lujan. ANZ failed to perform the services promised or to obtain a loan for Mr. Burton on more  
18 favorable terms.

19 CONCLUSIONS OF LAW

20           25. Based on the findings of fact contained in Paragraphs 1 through 24, ANZ  
21 acted by himself, or by and/or through one or more agents, associates, affiliates, employees  
22 and/or co-conspirators, including, but not limited to, BOAZ MINITZER; PATTI ABARCA;  
23 TRACEY L. COZZETTO; LEON MIRASOL; JUAN SANCHEZ; SHAWN JABER; LAURA  
24 CHOI; ERIN NEVINSON; JOSHUA REED; ALAN ALEXANDER; ARASH KAHAIRI;  
25 RANDY JACKSON; MEGAN EUBANK; ADAM STERN; MICHAEL TRENT; NICK M.  
26 MARTINEZ; STEFFANIE HEIDEN; SEAN ELLIS; DIMITRI LUJAN; MARIELLE EPSTEIN  
27 and DARRYL WASHINGTON, and used the fictitious business names "Federal Loan



1 Modification, LLP," "Federal Loan Modification, LLC," "Federal Loan Modifications," "Federal  
2 Loan Modification," "Federal Loan Modification Law Center, LLP," "Federal Loan  
3 Modification Law Center," "FLM Law Center," "Anz & Associates, PLC," and/ or other names  
4 or fictitious names unknown at this time.

5           26. ANZ used the fictitious business names described in Paragraphs 7 and 8  
6 above to solicit borrowers and perform services for those borrowers and/or those borrowers'  
7 lenders in connection with loans secured directly or collaterally by one or more liens on real  
8 property, and charged, demanded or collected advance fees for the services to be provided,  
9 which acts require a real estate broker license under Sections 10131(d) and 10131.2 of the Code,  
10 during a period of time when "Federal Loan Modification, LLP," "Federal Loan Modification,  
11 LLC," "Federal Loan Modifications," "Federal Loan Modification," "Federal Loan Modification  
12 Law Center, LLP," "Federal Loan Modification Law Center," "FLM Law Center," "Anz &  
13 Associates, PLC," were not licensed by the Department in any capacity, in violation of Section  
14 10159.5 of the Code and Regulation 2731.

15           27. Based on the findings of fact contained in Paragraphs 1 through 24, ANZ  
16 acted by himself, or by and/or through one or more agents, associates, affiliates, and/or co-  
17 conspirators, including, but not limited to, BOAZ MINITZER; PATTI ABARCA; LEON  
18 MIRASOL; JUAN SANCHEZ; SHAWN JABER; LAURA CHOI; ERIN NEVINSON;  
19 JOSHUA REED; ALAN ALEXANDER; ARASH KAHAIRI; RANDY JACKSON; MEGAN  
20 EUBANK; ADAM STERN; MICHAEL TRENT; NICK M. MARTINEZ; STEFFANIE  
21 HEIDEN; SEAN ELLIS; DIMITRI LUJAN; MARIELLE EPSTEIN and DARRYL  
22 WASHINGTON and using the names "Federal Loan Modification, LLP," "Federal Loan  
23 Modification, LLC," "Federal Loan Modifications," "Federal Loan Modification," "Federal  
24 Loan Modification Law Center, LLP," "Federal Loan Modification Law Center," "FLM Law  
25 Center," "Anz & Associates, PLC," or other names or fictitious names unknown at this time.

26           28. ANZ employed or compensated the persons named in Paragraph 27 above to  
27 solicit borrowers and perform services for those borrowers and/or those borrowers' lenders in

1 connection with loans secured directly or collaterally by one or more liens on real property, and  
2 charged, demanded or collected advance fees for the services to be provided, which requires a  
3 real estate broker license under Sections 10131(d) and 10131.2 of the Code, during a period of  
4 time when the aforementioned persons were not licensed by the Department as a real estate  
5 broker or salesperson licensed to work under the employ of ANZ, in violation of Section 10137  
6 of the Code.

7           29. Based on the information contained in Paragraphs 1 through 24 above, BOAZ  
8 MINITZER; PATTI ABARCA; LEON MIRASOL; JUAN SANCHEZ; SHAWN JABER;  
9 LAURA CHOI; ERIN NEVINSON; JOSHUA REED; ALAN ALEXANDER; ARASH  
10 KAHAIRI; RANDY JACKSON; MEGAN EUBANK; ADAM STERN; MICHAEL TRENT;  
11 NICK M. MARTINEZ; SEAN ELLIS; DIMITRI LUJAN; and DARRYL WASHINGTON,  
12 performed and/or participated in loan solicitation, negotiation and modification activities which  
13 require a real estate broker license under the provisions of Sections 10131(d) and 10131.2 of the  
14 Code during a period of time when none of them were licensed by the Department as a real estate  
15 broker nor employed as a real estate salesperson by the broker on whose behalf the activities  
16 were performed in violation of Section 10130 of the Code.

17           30. Based on the information contained in Paragraphs 9 through 24 above, ANZ  
18 collected fees pursuant to an agreement which constitutes an advance fee agreement within the  
19 meaning of Section 10085 of the Code.

20           31. Based on the information contained in Paragraphs 7 through 23 above, the  
21 failure by ANZ to submit the advance fee agreement and advertising to the Commissioner ten  
22 days before using it constitutes a violation of Section 10085 of the Code and Section 2970 of  
23 the Regulations.

24           32. Based on the information contained in Paragraphs 7 through 24 above, ANZ  
25 violated Section 10137 of the Code by employing and/or compensating individuals who were not  
26 licensed as a real estate salesperson or as a broker to perform activities requiring a real estate  
27 license.

1 DESIST AND REFRAIN ORDER

2 Based upon the FINDINGS OF FACT and CONCLUSIONS OF LAW stated  
3 herein, it is hereby ordered that NABILE JOHN ANZ, doing business as "Federal Loan  
4 Modification, LLP," "Federal Loan Modification, LLC," "Federal Loan Modifications," "Federal  
5 Loan Modification," "Federal Loan Modification Law Center, LLP," "Federal Loan  
6 Modification Law Center," "FLM Law Center," "Anz & Associates, PLC," and/or any other  
7 fictitious business name used by NABILE JOHN ANZ, whether doing business under his own  
8 name, or any other names, or any fictitious name; and BOAZ MINITZER; PATTI ABARCA;  
9 TRACEY L. COZZETTO; LEON MIRASOL; JUAN SANCHEZ; SHAWN JABER; LAURA  
10 CHOI; ERIN NEVINSON; JOSHUA REED; ALAN ALEXANDER; ARASH KAHAIRI;  
11 RANDY JACKSON; MEGAN EUBANK; ADAM STERN; MICHAEL TRENT; NICK M.  
12 MARTINEZ; STEFFANIE HEIDEN; SEAN ELLIS; DIMITRI LUJAN; MARIELLE EPSTEIN  
13 and DARRYL WASHINGTON, ARE HEREBY ORDERED to immediately desist and refrain  
14 from performing any acts within the State of California for which a real estate broker license is  
15 required unless and until you are in compliance with the Real Estate Law as set forth in this  
16 Order. In particular, you are ORDERED TO DESIST AND REFRAIN from:

17 1. Immediately desist and refrain from charging, demanding, claiming,  
18 collecting and/or receiving advance fees, as that term is defined in Section 10026 of the Code,  
19 in any form, and under any conditions, with respect to the performance of loan modification or  
20 any other form of mortgage loan forbearance services in connection with loans on residential  
21 property containing four or fewer dwelling units (Code Section 10085.6).

22 2. Immediately desist and refrain from charging, demanding, claiming, collecting  
23 and/or receiving advance fees, as that term is defined in Section 10026 of the Code, for any of  
24 the other real estate related services offered to others, unless and until you demonstrate and  
25 provide evidence satisfactory to the Commissioner that you:

26 (a) have an advance fee agreement which has been submitted to the Department  
27 and which is in compliance with Section 10085 of the Code and Section 2970 of the Regulations;

1 (b) have placed all previously collected advance fees into a trust account for that  
2 purpose and is in compliance with Section 10146 of the Code; and

3 (c) have provided an accounting to trust fund owner-beneficiaries from whom  
4 advance fees have previously been collected in compliance with Section 10146 of the Code and  
5 Section 2972 of the Regulations.

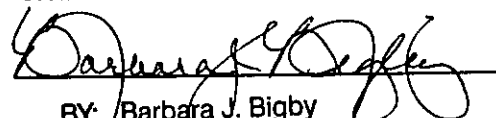
6 3. IT IS HEREBY ORDERED that BOAZ MINITZER; PATTI ABARCA;  
7 LEON MIRASOL; JUAN SANCHEZ; SHAWN JABER; LAURA CHOI; ERIN NEVINSON;  
8 JOSHUA REED; ALAN ALEXANDER; ARASH KAHAIRI; RANDY JACKSON; MEGAN  
9 EUBANK; ADAM STERN; MICHAEL TRENT; NICK M. MARTINEZ; SEAN ELLIS;  
10 DIMITRI LUJAN and DARRYL WASHINGTON, whether doing business under their own  
11 names, or any other names, or any fictitious name, ARE HEREBY ORDERED to immediately  
12 desist and refrain from performing any acts within the State of California for which a real estate  
13 broker license is required. In particular each of them is ORDERED TO DESIST AND  
14 REFRAIN from:

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

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

23 DATED: 1-19-2010

24  
25 JEFF DAVI  
Real Estate Commissioner

26   
27 BY: Barbara J. Bigby  
Chief Deputy Commissioner

1 **Notice:** Business and Professions Code Section 10139 provides that "Any person acting as a  
2 real estate broker or real estate salesperson without a license or who advertises using words  
3 indicating that he or she is a real estate broker without being so licensed shall be guilty of a  
4 public offense punishable by a fine not exceeding twenty thousand dollars (\$20,000), or by  
5 imprisonment in the county jail for a term not to exceed six months, or by both fine and  
6 imprisonment; or if a corporation, be punished by a fine not exceeding sixty thousand dollars  
7 (\$60,000)."

8  
9  
10 cc: Nabile John Anz dba:  
11 Federal Loan Modification, LLP, Federal Loan Modification, LLC, Federal Loan  
12 Modifications, Federal Loan Modification, Federal Loan Modification Law Center, LLP,  
13 Federal Loan Modification Law Center, FLM Law Center, Anz & Associates, PLC

14  
15 c/o Legalzoom.com, Inc.  
16 7083 Hollywood Blvd., Ste. 180  
17 Los Angeles, CA 90028

18 9460 Balboa Blvd.  
19 Northridge, CA 91325

20  
21 7555 Irvine Center Drive, Ste. 100  
22 Irvine, CA 92618

23 1 Technology Drive, Bldg. A  
24 Irvine, CA 92618

25  
26 5455 Wilshire Blvd., Suite 700  
27 Los Angeles, CA 90036

Boaz Minitzer; Patti Abarca; Tracey L. Cozzetto; Leon Mirasol; Juan Sanchez; Shawn  
Jaber; Laura Choi; Erin Nevinson; Joshua Reed; Alan Alexander; Arash Kahairi; Randy  
Jackson; Megan Eubank; Adam Stern; Michael Trent; Nick M. Martinez; Steffanie  
Heiden; Sean Ellis; Dimitri Lujan; Marielle Epstein; and Darryl Washington

7555 Irvine Center Drive, Ste. 100  
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4 Telephone: (213) 576-6982

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DEPARTMENT OF REAL ESTATE

By         

8 STATE OF CALIFORNIA

9 DEPARTMENT OF REAL ESTATE

11 To: ) NO.  
12 )  
13 NABILE JOHN ANZ, doing business as ) ORDER TO DESIST AND REFRAIN  
14 Federal Loan Modification, LLP; ) (B&P Code Section 10086)  
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16 Federal Loan Modifications; )  
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19 Federal Loan Modification Law Center; )  
20 FLM Law Center; Anz & Associates, PLC; )  
21 and/or any other name or fictitious business )  
22 name used by Nabile John Anz; )  
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24 TRACEY L. COZZETTO; LEON MIRASOL; )  
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NICK M. MARTINEZ; STEFFANIE HEIDEN; )  
SEAN ELLIS; DIMITRI LUJAN; )  
MARIELLE EPSTEIN and )  
DARRYL WASHINGTON. )

1           The Commissioner (Commissioner) of the California Department of Real Estate  
2 (Department) caused an investigation to be made of the activities of NABILE JOHN ANZ  
3 (ANZ); BOAZ MINITZER; PATTI ABARCA; TRACEY L. COZZETTO; LEON MIRASOL;  
4 JUAN SANCHEZ; SHAWN JABER; LAURA CHOI; ERIN NEVINSON; JOSHUA REED;  
5 ALAN ALEXANDER; ARASH KAHAIRI; RANDY JACKSON; MEGAN EUBANK; ADAM  
6 STERN; MICHAEL TRENT; NICK M. MARTINEZ; STEFFANIE HEIDEN; SEAN ELLIS;  
7 DIMITRI LUJAN; MARIELLE EPSTEIN; and DARRYL WASHINGTON.

8           Whenever acts referred to below are attributed to ANZ, those acts are alleged to  
9 have been done by ANZ, acting by himself, or by and/or through one or more agents, associates,  
10 affiliates, and/or co-conspirators, including, but not limited to, BOAZ MINITZER; PATTI  
11 ABARCA; TRACEY L. COZZETTO; LEON MIRASOL; JUAN SANCHEZ; SHAWN JABER;  
12 LAURA CHOI; ERIN NEVINSON; JOSHUA REED; ALAN ALEXANDER; ARASH  
13 KAHAIRI; RANDY JACKSON; MEGAN EUBANK; ADAM STERN; MICHAEL TRENT;  
14 NICK M. MARTINEZ; STEFFANIE HEIDEN; SEAN ELLIS; DIMITRI LUJAN; MARIELLE  
15 EPSTEIN; and DARRYL WASHINGTON, and using the names "Federal Loan Modification,  
16 LLP," "Federal Loan Modification, LLC," "Federal Loan Modifications," "Federal Loan  
17 Modification," "Federal Loan Modification Law Center, LLP," "Federal Loan Modification Law  
18 Center," "FLM Law Center," "Anz & Associates, PLC," and/ or other names or fictitious names  
19 unknown at this time.

20           Based on that investigation, the Commissioner has determined that ANZ has  
21 engaged in, is engaging in, or is attempting to engage in, acts or practices constituting violations  
22 of the California Business and Professions Code (Code) and/or Title 10, Chapter 6, California  
23 Code of Regulations (Regulations). ANZ is engaging in the business of, acting in the capacity of,  
24 and/or advertising or assuming to act as, a real estate broker in the State of California within the  
25 meaning of Section 10131(d) (performing services for borrowers in connection with loans  
26 secured by real property) and Section 10131.2 (charging or collecting an advance fee in  
27 connection with obtaining a loan on real property) of the Code. Furthermore, based on the

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

3 FINDINGS OF FACT

4 Licensees

5 1. ANZ is presently licensed and/or has license rights under the Real Estate Law  
6 as a real estate broker.

7 2. TRACEY L. COZZETTO, is presently licensed and/or has license rights  
8 under the Real Estate Law as a real estate broker.

9 3. STEFFANIE HEIDEN and MARIELLE EPSTEIN, are presently licensed  
10 and/or have license rights under the Real Estate Law as real estate salespersons.

11 Unlicensed Fictitious Business Name Usage

12 4. Use of a fictitious business name for activities requiring the issuance of a real  
13 estate license requires the filing of an application for the use of such name with the Department  
14 in accordance with the provisions of Section 10159.5 of the Code.

15 5. ANZ has been licensed by the Department as a real estate broker since  
16 April 12, 1991. ANZ has no current fictitious business names listed under his real estate broker  
17 license.

18 6. "Federal Loan Modification, LLP," "Federal Loan Modification, LLC,"  
19 "Federal Loan Modifications," "Federal Loan Modification," "Federal Loan Modification Law  
20 Center, LLP," "Federal Loan Modification Law Center," "FLM Law Center," and "Anz &  
21 Associates, PLC" have never been licensed by the Department in any capacity.

22 7. During a period of time from approximately May of 2008 to the present time,  
23 ANZ, while doing business as "Federal Loan Modification, LLP," "Federal Loan Modification,  
24 LLC," "Federal Loan Modifications," "Federal Loan Modification," "Federal Loan Modification  
25 Law Center, LLP," "Federal Loan Modification Law Center," "FLM Law Center," "Anz &  
26 Associates, PLC" and/or other names or fictitious names unknown at this time, acted in the  
27 capacity of, advertised or assumed to act as a real estate broker in the State of California, within



1 the meaning of Sections 10131(d) and 10131.2 of the Code, for or in expectation of  
2 compensation.

3 8. For an unknown period of time beginning no later than May 2008, and  
4 continuing to the present time, ANZ advertised, and continues to advertise, his services under  
5 one or more business names including, but not limited to, "Federal Loan Modification, LLP,"  
6 "Federal Loan Modification, LLC," "Federal Loan Modifications," "Federal Loan Modification,"  
7 "Federal Loan Modification Law Center, LLP," "Federal Loan Modification Law Center," "FLM  
8 Law Center," "Anz & Associates, PLC," in various print and electronic media, including a  
9 website located at <http://www.fedmod.com>. Those advertisements solicited, and continue to  
10 solicit, borrowers offering loan modification services.

11 9. ANZ, while doing business as the fictitious names listed in Paragraphs 7 and 8  
12 above, engaged in the business of claiming, demanding, charging, receiving, collecting or  
13 contracting for the collection of an advance fee, as defined by Section 10026 of the Code,  
14 including but not limited to, the activities described in Paragraphs 14 through 24, below.

15 10. ANZ, while doing business as the fictitious names listed in Paragraphs 7 and  
16 8 above, failed to submit the advance fee agreements and advertising referred to in Paragraphs  
17 14 through 23, below, to the Commissioner ten days before using them.

18 11. ANZ solicited and represented borrowers in negotiating, refinancing, and  
19 obtaining mortgage loans. ANZ acted without Department authorization in using the afore-  
20 mentioned fictitious business names to engage in activities requiring the issuance of a real estate  
21 license in violation of Section 10159.5 of the Code and Regulation 2731.

22 Employment and/or Compensation of Unlicensed Persons

23 12. BOAZ MINITZER; PATTI ABARCA; LEON MIRASOL; JUAN  
24 SANCHEZ; SHAWN JABER; LAURA CHOI; ERIN NEVINSON; JOSHUA REED; ALAN  
25 ALEXANDER; ARASH KAHAIRI; RANDY JACKSON; MEGAN EUBANK; ADAM  
26 STERN; MICHAEL TRENT; NICK M. MARTINEZ; SEAN ELLIS; DIMITRI LUJAN and  
27 DARRYL WASHINGTON are not now, and have never been, licensed by the Department in any

1 capacity.

2 13. ANZ employed and/or compensated individuals including those named  
3 herein, who were not licensed as real estate salespersons or as real estate brokers to perform  
4 some or all of the services alleged in Paragraphs 14 through 24, below in violation of Section  
5 10137 of the Code.

6 14. During the period of time from approximately May 2008 to the present time,  
7 ANZ solicited borrowers and negotiated to do one or more of the following acts for another or  
8 others, for or in expectation of compensation: negotiate one or more loans for, or perform  
9 services for, borrowers and/or lenders in connection with loans secured directly or collaterally by  
10 one or more liens on real property; and charge, demand or collect an advance fee for any of the  
11 services offered.

12 Francisco Arzate and Gloria Arzate transaction

13 15. On or about May 12, 2008, ANZ, doing business as Federal Loan  
14 Modification Law Center, entered into an agreement with Francisco Arzate and his mother Gloria  
15 Arzate to handle the refinance of the Arzate's real property located at 1238 Wingate Place,  
16 Pomona, California 91768. The Arzates dealt with Federal Loan Modification Law Center  
17 representative Patti Abarca. ANZ failed to perform the services promised.

18 Patricia Peters transaction

19 16. On or about October 21, 2008, ANZ, doing business as Federal Loan  
20 Modification ("FLM"), entered into a loan modification agreement with Patricia Peters. Pursuant  
21 to the terms of the written fee agreement, Ms. Peters paid an advance fee of \$2,995 and FLM was  
22 to submit a loss mitigation package and negotiate the terms of Ms. Peters' residential mortgage  
23 loan with her lender regarding real property located at 25035 Peppertree Court, Corona,  
24 California 92883. Ms. Peters dealt with FLM representatives Shawn Jaber and Laura Choi.  
25 ANZ failed to perform the services promised or to obtain a loan for Ms. Peters on more favorable  
26 terms.

27

1 John Carr transaction

2 17. On or about January 12, 2009, ANZ, doing business as FLM Law Center,  
3 LLP, entered into a loan modification agreement with John Carr. Pursuant to the terms of the  
4 written agreement, Mr. Carr paid an advance fee of \$2,995 and FLM was to negotiate the terms  
5 of his first and second mortgage loans on real property located at 610 E. Mansfield, Pontiac,  
6 Michigan 48340. Mr. Carr dealt primarily with FLM Law Center, LLP representative Darryl  
7 Washington. ANZ failed to perform the services promised or to obtain a loan for Mr. Carr on  
8 more favorable terms.

9 Verneen and Arnold Sutherland transaction

10 18. On or about January 12, 2009, ANZ, doing business as FLM Law Center,  
11 LLP, entered into a loan modification agreement with Verneen and Arnold Sutherland. Pursuant  
12 to the terms of the written agreement, the Sutherlands paid an advance fee of \$4,190 and FLM  
13 was to negotiate the terms of their first and second mortgage loans on real property located at  
14 15180 N.E. 16<sup>th</sup> Ave., North Miami Beach, Florida 33162. The Sutherlands dealt primarily with  
15 FLM Law Center, LLP representatives Tracey Cozzetto, Leon Mirasol and Juan Sanchez. ANZ  
16 failed to perform the services promised or to obtain a loan for the Sutherlands on more favorable  
17 terms.

18 Lloyd V. Morris transaction

19 19. On or about January 15, 2009, ANZ, doing business as FLM Law Center,  
20 LLP, entered into a loan modification agreement with Lloyd V. Morris. Pursuant to the terms of  
21 the agreement, Mr. Morris paid an advance fee of \$4,190 and FLM Law Center, LLP was to  
22 negotiate the terms of Mr. Morris' first and second mortgages on real property located at 943  
23 Rancho Roble Way, Sacramento, California 95834. Mr. Morris dealt primarily with FLM Law  
24 Center, LLP representatives Erin Nevinson and Joshua Reed. ANZ failed to perform the services  
25 promised or to obtain a loan for Mr. Morris on more favorable terms.

26 ///

1 Joaquin Gutierrez transaction

2           20. On or about January 28, 2009, ANZ, doing business as FLM Law Center,  
3 LLP, entered into a loan modification agreement with Joaquin Guitierrez. Pursuant to the terms  
4 of the written agreement, Mr. Gutierrez paid an advance fee of \$3,500 and FLM was to negotiate  
5 the terms of his mortgage loan on real property located at 1024 Wernli Court, Arvin, California  
6 93203. Mr. Gutierrez dealt primarily with FLM Law Center, LLP representative Marielle  
7 Epstein. ANZ failed to perform the services promised or to obtain a loan for Mr. Gutierrez on  
8 more favorable terms.

9 Brian McCammond transaction

10           21. On or about February 19, 2009, ANZ, doing business as FLM, also known as  
11 Federal Loan Modification Law Center, LLP, entered into a loan modification agreement with  
12 Brian McCammond. Pursuant to the terms of the written fee agreement, Mr. McCammond paid  
13 an advance fee of \$4,190 and FLM was to negotiate the terms of Mr. McCammond's first and  
14 second mortgage loans on his residential property located at 323 N. 3<sup>rd</sup> Street, Los Banos,  
15 California 93635. Mr. McCammond dealt primarily with FLM representative and case evaluator  
16 Alan Alexander and Supervisor Arash Kahairi. ANZ failed to perform the services promised or  
17 to obtain a loan for Mr. McCammond on more favorable terms.

18 Rosemary De La Rosa transaction

19           22. On or about March 11, 2009, ANZ, doing business as FLM, entered into a  
20 loan modification agreement with Rosemary De La Rosa. Pursuant to the terms of the written  
21 agreement, Ms. De La Rosa paid an advance fee of \$1,000 and FLM was to negotiate the terms  
22 of Ms. De La Rosa's mortgage on real property located at 820 Stone Pine Way, Modesto,  
23 California 95351. Ms. De La Rosa dealt primarily with FLM representatives Randy Jackson,  
24 Megan Eubank, Adam Stern, Michael Trent, and Supervisor Arash Kahairi. ANZ failed to  
25 perform the services promised or to obtain a loan for Ms. De La Rosa on more favorable terms.

26 ///

27

1 Edna L. Paule and Danilo L. Paule transaction

2           23. On or about April 3, 2009, ANZ, doing business as FLM Law Center, LLP,  
3 entered into a loan modification agreement with Edna L. Paule and Danilo L. Paule. Pursuant to  
4 the terms of the written agreement, the Paules paid an advance fee of \$995 for negotiation of a  
5 first mortgage on real property located at 7701 Man O War Street, Las Vegas, Nevada 92618.  
6 The Paules dealt primarily with FLM Law Center, LLP representatives Nick M. Martinez,  
7 STEFFANIE Heiden and Sean Ellis. ANZ failed to perform the services promised or to obtain a  
8 loan for the Paules on more favorable terms.

9 Edward Lee Roy Burton transaction

10           24. On or about May 1, 2009, ANZ, doing business as Federal Loan Modification  
11 Law Center ("FLMC"), entered into a loan modification agreement with Edward Lee Roy  
12 Burton. Pursuant to the terms of the written fee agreement, Mr. Burton would pay an advance  
13 fee of \$995 and FLMC was to negotiate the terms of Mr. Burton's residential mortgage loan for  
14 real property located at 8469 Sierra Madre Street, Rancho Cucamonga, California 91730. Mr.  
15 Burton made numerous telephone calls in an attempt to reach ANZ. He never had any of his  
16 messages returned. Mr. Burton dealt with FLMC representative and case evaluator, Dimitri  
17 Lujan. ANZ failed to perform the services promised or to obtain a loan for Mr. Burton on more  
18 favorable terms.

19 CONCLUSIONS OF LAW

20           25. Based on the findings of fact contained in Paragraphs 1 through 24, ANZ  
21 acted by himself, or by and/or through one or more agents, associates, affiliates, employees  
22 and/or co-conspirators, including, but not limited to, BOAZ MINITZER; PATTI ABARCA;  
23 TRACEY L. COZZETTO; LEON MIRASOL; JUAN SANCHEZ; SHAWN JABER; LAURA  
24 CHOI; ERIN NEVINSON; JOSHUA REED; ALAN ALEXANDER; ARASH KAHAIRI;  
25 RANDY JACKSON; MEGAN EUBANK; ADAM STERN; MICHAEL TRENT; NICK M.  
26 MARTINEZ; STEFFANIE HEIDEN; SEAN ELLIS; DIMITRI LUJAN; MARIELLE EPSTEIN  
27 and DARRYL WASHINGTON, and used the fictitious business names "Federal Loan

1 Modification, LLP," "Federal Loan Modification, LLC," "Federal Loan Modifications," "Federal  
2 Loan Modification," "Federal Loan Modification Law Center, LLP," "Federal Loan Modification  
3 Law Center," "FLM Law Center," "Anz & Associates, PLC," and/ or other names or fictitious  
4 names unknown at this time.

5           26. ANZ used the fictitious business names described in Paragraphs 7 and 8  
6 above to solicit borrowers and perform services for those borrowers and/or those borrowers'  
7 lenders in connection with loans secured directly or collaterally by one or more liens on real  
8 property, and charged, demanded or collected advance fees for the services to be provided, which  
9 acts require a real estate broker license under Sections 10131(d) and 10131.2 of the Code, during  
10 a period of time when "Federal Loan Modification, LLP," "Federal Loan Modification, LLC,"  
11 "Federal Loan Modifications," "Federal Loan Modification," "Federal Loan Modification Law  
12 Center, LLP," "Federal Loan Modification Law Center," "FLM Law Center," "Anz &  
13 Associates, PLC," were not licensed by the Department in any capacity, in violation of Section  
14 10159.5 of the Code and Regulation 2731.

15           27. Based on the findings of fact contained in Paragraphs 1 through 24, ANZ  
16 acted by himself, or by and/or through one or more agents, associates, affiliates, and/or co-  
17 conspirators, including, but not limited to, BOAZ MINTZER; PATTI ABARCA; LEON  
18 MIRASOL; JUAN SANCHEZ; SHAWN JABER; LAURA CHOI; ERIN NEVINSON;  
19 JOSHUA REED; ALAN ALEXANDER; ARASH KAHAIRI; RANDY JACKSON; MEGAN  
20 EUBANK; ADAM STERN; MICHAEL TRENT; NICK M. MARTINEZ; STEFFANIE  
21 HEIDEN; SEAN ELLIS; DIMITRI LUJAN; MARIELLE EPSTEIN and DARRYL  
22 WASHINGTON and using the names "Federal Loan Modification, LLP," "Federal Loan  
23 Modification, LLC," "Federal Loan Modifications," "Federal Loan Modification," "Federal Loan  
24 Modification Law Center, LLP," "Federal Loan Modification Law Center," "FLM Law Center,"  
25 "Anz & Associates, PLC," or other names or fictitious names unknown at this time.

26           28. ANZ employed or compensated the persons named in Paragraph 27 above to  
27 solicit borrowers and perform services for those borrowers and/or those borrowers' lenders in

1 connection with loans secured directly or collaterally by one or more liens on real property, and  
2 charged, demanded or collected advance fees for the services to be provided, which requires a  
3 real estate broker license under Sections 10131(d) and 10131.2 of the Code, during a period of  
4 time when the aforementioned persons were not licensed by the Department as a real estate  
5 broker or salesperson licensed to work under the employ of ANZ, in violation of Section 10137  
6 of the Code.

7           29. Based on the information contained in Paragraphs 1 through 24 above, BOAZ  
8 MINITZER; PATTI ABARCA; LEON MIRASOL; JUAN SANCHEZ; SHAWN JABER;  
9 LAURA CHOI; ERIN NEVINSON; JOSHUA REED; ALAN ALEXANDER; ARASH  
10 KAHAIRI; RANDY JACKSON; MEGAN EUBANK; ADAM STERN; MICHAEL TRENT;  
11 NICK M. MARTINEZ; SEAN ELLIS; DIMITRI LUJAN; and DARRYL WASHINGTON,  
12 performed and/or participated in loan solicitation, negotiation and modification activities which  
13 require a real estate broker license under the provisions of Sections 10131(d) and 10131.2 of the  
14 Code during a period of time when none of them were licensed by the Department as a real estate  
15 broker nor employed as a real estate salesperson by the broker on whose behalf the activities  
16 were performed in violation of Section 10130 of the Code.

17           30. Based on the information contained in Paragraphs 9 through 24 above, ANZ  
18 collected fees pursuant to an agreement which constitutes an advance fee agreement within the  
19 meaning of Section 10085 of the Code.

20           31. Based on the information contained in Paragraphs 7 through 23 above, the  
21 failure by ANZ to submit the advance fee agreement and advertising to the Commissioner ten  
22 days before using it constitutes a violation of Section 10085 of the Code and Section 2970 of the  
23 Regulations.

24           32. Based on the information contained in Paragraphs 7 through 24 above, ANZ  
25 violated Section 10137 of the Code by employing and/or compensating individuals who were not  
26 licensed as a real estate salesperson or as a broker to perform activities requiring a real estate  
27 license.

1  
2 DESIST AND REFRAIN ORDER

3 Based upon the FINDINGS OF FACT and CONCLUSIONS OF LAW stated  
4 herein, it is hereby ordered that NABILE JOHN ANZ, doing business as "Federal Loan  
5 Modification, LLP," "Federal Loan Modification, LLC," "Federal Loan Modifications," "Federal  
6 Loan Modification," "Federal Loan Modification Law Center, LLP," "Federal Loan Modification  
7 Law Center," "FLM Law Center," "Anz & Associates, PLC," and/or any other fictitious business  
8 name used by NABILE JOHN ANZ, whether doing business under his own name, or any other  
9 names, or any fictitious name; and BOAZ MINITZER; PATTI ABARCA; TRACEY L.  
10 COZZETTO; LEON MIRASOL; JUAN SANCHEZ; SHAWN JABER; LAURA CHOI; ERIN  
11 NEVINSON; JOSHUA REED; ALAN ALEXANDER; ARASH KAHAIRI; RANDY  
12 JACKSON; MEGAN EUBANK; ADAM STERN; MICHAEL TRENT; NICK M. MARTINEZ;  
13 STEFFANIE HEIDEN; SEAN ELLIS; DIMITRI LUJAN; MARIELLE EPSTEIN and DARRYL  
14 WASHINGTON, ARE HEREBY ORDERED to immediately desist and refrain from performing  
15 any acts within the State of California for which a real estate broker license is required unless and  
16 until you are in compliance with the Real Estate Law as set forth in this Order. In particular, you  
17 are ORDERED TO DESIST AND REFRAIN from:

18 1. Immediately desist and refrain from charging, demanding, claiming,  
19 collecting and/or receiving advance fees, as that term is defined in Section 10026 of the Code, in  
20 any form, and under any conditions, with respect to the performance of loan modification or any  
21 other form of mortgage loan forbearance services in connection with loans on residential  
22 property containing four or fewer dwelling units (Code Section 10085.6).

23 2. Immediately desist and refrain from charging, demanding, claiming, collecting  
24 and/or receiving advance fees, as that term is defined in Section 10026 of the Code, for any of the  
25 other real estate related services offered to others, unless and until you demonstrate and provide  
26 evidence satisfactory to the Commissioner that you:  
27



1 (a) have an advance fee agreement which has been submitted to the Department  
2 and which is in compliance with Section 10085 of the Code and Section 2970 of the Regulations;

3 (b) have placed all previously collected advance fees into a trust account for that  
4 purpose and is in compliance with Section 10146 of the Code; and

5 (c) have provided an accounting to trust fund owner-beneficiaries from whom  
6 advance fees have previously been collected in compliance with Section 10146 of the Code and  
7 Section 2972 of the Regulations.

8 3. IT IS HEREBY ORDERED that BOAZ MINITZER; PATTI ABARCA;  
9 LEON MIRASOL; JUAN SANCHEZ; SHAWN JABER; LAURA CHOI; ERIN NEVINSON;  
10 JOSHUA REED; ALAN ALEXANDER; ARASH KAHAIRI; RANDY JACKSON; MEGAN  
11 EUBANK; ADAM STERN; MICHAEL TRENT; NICK M. MARTINEZ; SEAN ELLIS;  
12 DIMITRI LUJAN and DARRYL WASHINGTON, whether doing business under their own  
13 names, or any other names, or any fictitious name, ARE HEREBY ORDERED to immediately  
14 desist and refrain from performing any acts within the State of California for which a real estate  
15 broker license is required. In particular each of them is ORDERED TO DESIST AND  
16 REFRAIN from:

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

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

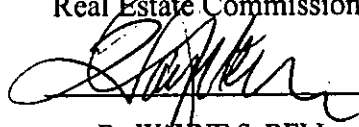
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26 ///

27 ///

1 DATED: 12/24/2009

2  
3 JEFF DAVI  
Real Estate Commissioner

4   
5 By WAYNE S. BELL  
6 Chief Counsel

7 **Notice:** Business and Professions Code Section 10139 provides that "Any person acting as a  
8 real estate broker or real estate salesperson without a license or who advertises using words  
9 indicating that he or she is a real estate broker without being so licensed shall be guilty of a  
10 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)."

11  
12 cc: Nabile John Anz dba:  
13 Federal Loan Modification, LLP, Federal Loan Modification, LLC, Federal Loan  
14 Modifications, Federal Loan Modification, Federal Loan Modification Law Center, LLP,  
Federal Loan Modification Law Center, FLM Law Center, Anz & Associates, PLC

15 c/o Legalzoom.com, Inc.  
16 7083 Hollywood Blvd., Ste. 180 9460 Balboa Blvd.  
17 Los Angeles, CA 90028 Northridge, CA 91325

18 7555 Irvine Center Drive, Ste. 100 1 Technology Drive, Bldg. A  
Irvine, CA 92618 Irvine, CA 92618

19 5455 Wilshire Blvd., Suite 700  
20 Los Angeles, CA 90036

21 Boaz Minitzer; Patti Abarca; Tracey L. Cozzetto; Leon Mirasol; Juan Sanchez; Shawn  
22 Jaber; Laura Choi; Erin Nevinson; Joshua Reed; Alan Alexander; Arash Kahairi; Randy  
23 Jackson; Megan Eubank; Adam Stern; Michael Trent; Nick M. Martinez; Steffanie  
Heiden; Sean Ellis; Dimitri Lujan; Marielle Epstein; and Darryl Washington

24 7555 Irvine Center Drive, Ste. 100  
25 Irvine, CA 92618