DEPARTMENT OF REAL ESTATE
320 West Fourth Street, Ste. 350
Los Angeles, California 90013

(213) 576-6982

FILED

MAY 02 2011

DEPARTMENT OF REAL ESTATE
BY: _____

STATE OF CALIFORNIA

DEPARTMENT OF REAL ESTATE

To:	
SAFE HARBOR DEBT MANAGEMENT, INC., or any other fictitious names used by Safe Harbor Debt Management, LLC; and RAMIN REDJAI	NO. H- 37240 LA ORDER TO DESIST AND REFRAIN (B&P Code Section 10086)

The Commissioner ("Commissioner") of the California Department of Real Estate ("Department") caused an investigation to be made of the activities SAFE HARBOR DEBT MANAGEMENT, INC. ("SHDM") and RAMIN REDJAI ("REDJAI"). Based on that investigation, the Commissioner has determined that SHDM or any other fictitious business names used by SHDM and REDJAI 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") and/or Title 10, California Code of Regulations ("Regulations"), including the business of, acting in the capacity of, and/or advertising or assuming to act as, a real estate broker in the State of California within the meaning of Code Section 10131(d) (performing

services for borrowers in connection with loans secured by real property) and 10131.2 (advance fee handling) of the Code. Based on the findings of that investigation, set forth below, 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.

Whenever acts referred to below are attributed to SHDM or REDJAI, those acts are alleged to have been done by themselves, or by and/or through one or more agents, associates, affiliates, and/or co-conspirators, or other names or fictitious names unknown at this time.

FINDINGS OF FACT

1. SHDM is not now, and has never been, licensed by the Department in any capacity. SHDM is a registered corporation incorporated under the laws of the State of California with a Statement of Information filed with the Secretary of State listing REDJAI as the Chief Executive Officer, Secretary, Chief Financial Officer, Director, and Agent for Service of Process. SHDM has a Fictitious Business Name Statement filed with the Orange County Clerk-Recorder with Esquire Capital Group, Inc. listed as the registered owners.

2. REDJAI has been licensed by the Department as a real estate broker since March 2, 2004 and is presently the designated officer for Apex Funding Inc..

3. On or about September 14, 2008, SHDM solicited Todd B. on the telephone to apply for a loan modification. When Todd B. asked for a license number to verify the legitimacy of the company, the caller declined to state his own name informed him that they a real estate license is not required to do mortgage modifications because SHDM had lawyers at their location. Todd B. checked the SHDM (http://www.safeharbordebt.com) and DRE websites and discovered that SHDM is not licensed with the DRE.

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4. On or about August 16, 2008, Ihsan Z. paid to SHDM an advance fee of $1,000.00 by personal check (Check No. 107), pursuant to an agreement pertaining to loan solicitation, negotiation, and modification services to be provided by SHDM with respect to a loan secured by real property located at 23412 Pacific Park Drive, #14D, Aliso Viejo, CA 92656. On or about September 2, 2008, Ihsan Z. paid SHDM the balance of the advance fee owed, $1,500.00 by personal check (Check No. 103). After eight months, Ihsan Z. learned that SHDM had not worked on any loan modification or negotiation on the Aliso Viejo property; SHDM refused to return any of Ihsan Z.'s attempts to communicate regarding themodification.

5. SHDM and REDJAI did not submit the advance fee agreement referred to in Paragraph 5 above, to the Commissioner ten days before using it.

CONCLUSIONS OF LAW

6. Based on the findings of fact contained in paragraphs 1 through 5, SHDM, acting by itself, or by and/or through agents, associates, representatives, and/or co-conspirators, including, but not limited to REDJAI, and using the name "Safe Harbor Debt Management" or other names or fictitious names unknown at this time, solicited borrowers and performed services for those borrowers and/or those borrowers' lenders in connection with loans secured directly or collaterally by one or more liens on real property, and charged, demanded or collected advance fees for the services to be provided, which acts require a real estate broker license under Sections 10131(d) and 10131.2 of the Code, during a period of time when SHDM was not licensed by the Department as a real estate broker, in violation of Section 10130 of the Code.

7. Based on the findings of fact contained in paragraphs 1 through 5, the agreement between Ihsan Z. and SHDM constitutes an advance fee agreement within the meaning of Code Section 10026. The failure by REDJAI to submit the advance fee agreement to the Commissioner two days before using it constitutes a violation of Code Section 10085 and Regulation 2970.

DESIST AND REFRAIN ORDER:

SAFE HARBOR DEBT MANAGEMENT, INC.

Based upon the Findings of Fact and Conclusions of Law stated herein, it is hereby ordered that SAFE HARBOR DEBT MANAGEMENT, INC. whether doing business under your own nameor any other name(s) or fictitious name(s), ARE HEREBYORDRED to immediately desist and refrain from performing any acts within the State of California for which a real estate broker license is required, unless you are so licensed. In particular you are ORDERED TO DESIST AND REFRAIN from:

1. 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; and
2. 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.

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DESIST AND REFRAIN ORDER:

RAMIN REDJAI

Based upon the Findings of Fact and Conclusions of Law stated herein, it is hereby ordered that RAMIN REDJAI, whether doing business under your own name or any other name(s) or fictitious name(s), IS HEREBYORDERED to:

1. immediately desist and refrain from 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 loan modification, loan refinance, principal reduction, foreclosure abatement or short sale services, or any other form of mortgage loan forbearance services in connection with loans on residential property containing four or fewer dwelling units (Code Section 10085.6);
2. Immediately desist and refrain from charging, demanding, claiming, collecting and/or receiving advance fees, as that term is defined in Section 10026 of the Code, for any of the other real estate related services offered to others, unless and until RAMIN REDJAI demonstrates and provide evidence satisfactory to the Commissioner that RAMIN REDJAI:
   a. has an advance fee agreement which has been submitted to the Commissioner in compliance with Code Section 10085 and Section 2970 of the Regulations;
   b. has placed all previously collected advance fees into a trust account for that purpose in compliance with the provisions of Code Section 10146;
   c. has complied with the provisions of Code Section 10145 and Sections 2831, 2831.1 and 2831.2 of the Regulations with respect to any trust account into which advance fees are deposited; and

d. has provided an accounting to trust fund owner-beneficiaries from whom advance fees have previously been collected in compliance with Code Section 10146 and Section 2972 of the Regulations.

DATED: 4-25 2011

JEFF DAVI
Real Estate Commissioner

By _____

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: SAFE HARBOR DEBT MANAGEMENT, INC.
2973 Harbor Blvd., Suite 570
Costa Mesa, CA 92626

RAMIN REDJAI
101 Luminous
Irvine, CA 92603