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**FILED**

FEB 19 2013

1 Department of Real Estate  
2 320 West 4th Street, Suite 350  
3 Los Angeles, California 90013-1105

DEPARTMENT OF REAL ESTATE  
BY: *[Signature]*

7 BEFORE THE DEPARTMENT OF REAL ESTATE

8 STATE OF CALIFORNIA

9 \* \* \* \*

11 To:	)	No. H-04461 SD
	)	
12 J. KEEGAN CONSULTING, INC., dba	)	
13 DEBT SOLUTIONS GROUP	)	
	)	<u>ORDER TO DESIST</u>
	)	<u>AND REFRAIN</u>
	)	
	)	(B&P Code Section 10086)

16 The Commissioner ("Commissioner") of the California Department of Real Estate  
17 ("Department") caused an investigation to be made of the activities of J. KEEGAN  
18 CONSULTING, INC. ("JKCI") dba DEBT SOLUTIONS GROUP, ("DSG"). Based on that  
19 investigation, the Commissioner has determined that JKCI and DSG have engaged in, or are  
20 engaging in acts, or are attempting to engage in the business of, acting in the capacity of, and/or  
21 assuming to act as real estate brokers in the State of California within the meaning of Business  
22 and Professions Code Sections 10131(d) (negotiating and performing services for borrowers in  
23 connection with loans secured by real property) and 10131.2 (advance fee handling).

24 In addition, based on that investigation, the Commissioner has determined that  
25 JKCI and DSG have engaged in or are engaging in acts or are attempting to engage in practices  
26 constituting violations of the California Business and Professions Code ("Code"). Based on the  
27

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

4 FINDINGS OF FACT

5 1. JKCI and DSG are not now, and have never been, licensed by the Department  
6 in any capacity.

7 2. On August 5, 2009 JKCI filed a Fictitious Business Name Statement with the  
8 San Diego County Recorder/Clerk, registering itself under the fictitious business name for DSG.

9 3. At the times set forth below, JKCI and DSG negotiated to do one or more of  
10 the following acts for another or others, for or in expectation of compensation: engaged in the  
11 business of a loan modification and negotiation service and advance fee brokerage with respect  
12 to loans which were secured by liens on real property for compensation or in expectation of  
13 compensation and for fees collected in advance of the transaction.

14 Michael C. Transaction

15 4. On or about January 25, 2010, Michael C. entered into a Loan Modification  
16 Fee Agreement with DSG in which DSG agreed to negotiate a modification of Michael C's  
17 home mortgage loan in exchange for the payment of an advance fee. Michael C. paid an  
18 advance fee of \$1,000 to Debt Solutions Group on February 1, 2010 and an additional advance  
19 fee of \$1,000 to Debt Solutions Group on March 1, 2010.

20 David U. Transaction

21 5. On or about January 28, 2010, David U. entered into a Loan Modification Fee  
22 Agreement with DSG in which DSG agreed to negotiate a modification of David U's home  
23 mortgage loan in exchange for the payment of an advance fee. David U. paid an advance fee of  
24 \$2,500 to Debt Solutions Group on January 27, 2010.

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1 CONCLUSIONS OF LAW

2 6. Based on the information contained in Paragraphs 1 through 5 above,  
3 J. KEEGAN CONSULTING, INC. and DEBT SOLUTIONS GROUP violated Code Section  
4 10130 by engaging in activities requiring a broker license without first obtaining a broker  
5 license from the Department.

6 DESIST AND REFRAIN ORDER

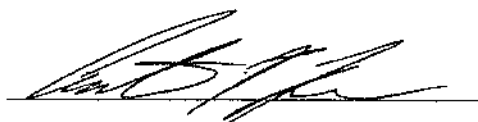
7 Based upon the FINDINGS OF FACT and CONCLUSIONS OF LAW stated  
8 herein, it is hereby ordered that J. KEEGAN CONSULTING, INC. and DEBT SOLUTIONS  
9 GROUP, immediately desist and refrain from: performing any acts within the State of California  
10 for which a real estate broker license is required, unless you are so licensed.

11 IT IS FURTHER ORDERED THAT J. KEEGAN CONSULTING, INC. and  
12 DEBT SOLUTIONS GROUP immediately desist and refrain from:

- 13 1. Charging, demanding, claiming, collecting and/or receiving advance fees, as  
14 that term is defined in Section 10026 of the Code, in any form, and under any  
15 conditions, with respect to the performance of loan modification or any other  
16 form of mortgage loan forbearance services in connection with loans on  
17 residential property containing four or fewer dwelling units.
- 18 2. Charging, demanding, claiming, collecting and/or receiving advance fees, as  
19 that term is defined in Section 10026 of the Code, for any of the other real  
20 estate related services offered to others.

21  
22 DATED: 2/5/13

23  
24 Real Estate Commissioner

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27 By AWET P. KIDANE  
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  
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)."

5 cc: DEBT SOLUTIONS GROUP  
6 J. KEEGAN CONSULTING, INC.

7 4901 Morena Boulevard, Suite 702  
8 San Diego, CA 92117  
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