

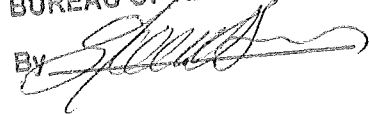
1 CHERYL D. KEILY SBN# 94008
2 Bureau of Real Estate
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4 Los Angeles, California 90013-1105

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FILED

JAN 25 2016

BUREAU OF REAL ESTATE

By 

9 BEFORE THE BUREAU OF REAL ESTATE
10 STATE OF CALIFORNIA

11 * * *

12 In the Matter of the Accusation of) No. H-04768 SD
13 HOLLY A. WU,) A C C U S A T I O N
14)
15 Respondent.)
16 _____)

17
18 The Complainant, Veronica Kilpatrick, a Supervising Special Investigator of the
19 State of California, for cause of Accusation against HOLLY A. WU ("Respondent") is
20 informed and alleges as follows:

21 1.

22 The Complainant, Veronica Kilpatrick, a Supervising Special Investigator of the
23 State of California, makes this Accusation in her official capacity.

24 2.

25 Respondent is presently licensed and/or has license rights under the Real Estate
26 Law (Part 1 of Division 4 of the Business and Professions Code, hereinafter "Code") as a real
27 estate salesperson.

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1 and/or which otherwise created the false impression that the recipients were preapproved for
2 reduction of their mortgage loan payments. Specifically, SHLC mailed out "Payment
3 Reduction Notifications," stating that specific recipients were, "prequalified for an Economic
4 Advantage Payment and/or Principal Reduction Program," designed to bring house payments
5 current for less than the amounts owed and/or reductions in the principal balance. The mailers
6 also contained large print headings, including "FORM 012-S Payment Reduction Notification
7 Economic Stimulus 2013," that gave the misleading impression the solicitation was affiliated
8 with or from a government agency, when it was not.

9 8.

10 In or around October, 2013, consumer Felician W. ("Consumer") received a
11 Payment Reduction Notification from SHLC. Consumer called the number on the mailing and
12 was advised that SHLC could assist her with her mortgage loan. On or about October 28, 2013,
13 Consumer entered into an agreement with SHLC, to provide loan modification and related
14 foreclosure avoidance services in exchange for the payment of an advance fee in the amount of
15 \$685 per month. Respondent counseled Consumer in a "buy time" strategy, and directed her to
16 sign and return various forms to her. Consumer made advance fee payments totaling \$2,055
17 over a period of three months. Despite the foregoing, no services were provided to Consumer,
18 and she thereafter stopped making payments to SHLC.

19 9.

20 The activities described in Paragraphs 7 and 8, above, require a real estate broker
21 license under Sections 10131(d) and 10131.2 of the Code.

22 10.

23 Respondent performed and/or participated in loan modification, solicitation, and
24 negotiation activities which require a real estate broker license under the provisions of Code
25 Sections 10131(d) and 10131.2 when Respondent was not licensed by the Bureau as a real
26 estate broker nor employed as a real estate salesperson by the broker on whose behalf the
27 activities were performed in violation of Sections 10130 and 10137 of the Code.

11.

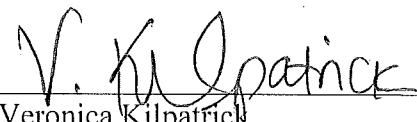
The conduct, acts and/or omissions of Respondent, as set forth, above, violate Code Section 10130, and are cause for the suspension or revocation of the licenses and license rights of Respondent pursuant to Code Sections 10177(d), 10177(g) and/or 10177(j).

Code Section 10106 provides, in pertinent part, that in any order issued in resolution of a disciplinary proceeding before the Bureau of Real Estate, the Commissioner may request the administrative law judge to direct a licensee found to have committed a violation of this part to pay a sum not to exceed the reasonable costs of investigation and enforcement of the case.

WHEREFORE, Complainant prays that a hearing be conducted on the allegations of this Accusation and that upon proof thereof, a decision be rendered imposing disciplinary action against all the licenses and license rights of Respondent HOLLY A. WU under the Real Estate Law, for the cost of investigation and enforcement as permitted by Code Section 10106, and for such other and further relief as may be proper under other applicable provisions of law.

Dated at Los Angeles, California

this 29 day of December, 2015.


Veronica Kilpatrick
Supervising Special Investigator

cc: Holly A. Wu
TriCastle Realty Inc.
Veronica Kilpatrick
Sacto.

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cc: HOLLY A. WU
TriCastle Realty Inc.
Veronica Kilpatri