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5/20  
**FILED**  
JAN 25 2012  
DEPARTMENT OF REAL ESTATE

By C.2

7  
8 BEFORE THE DEPARTMENT OF REAL ESTATE

9 STATE OF CALIFORNIA

10 \* \* \*

11 In the Matter of the Accusation of ) NO. H-37805 LA  
12 )  
13 CHRISTOPHER NEIL RICHARDSON, ) A C C U S A T I O N  
14 )  
15 Respondent. )

16 The Complainant, Maria Suarez, a Deputy Real Estate  
17 Commissioner of the State of California, for cause of Accusation  
18 against CHRISTOPHER NEIL RICHARDSON ("Respondent"), is informed  
19 and alleges as follows:

20 I

21 The Complainant, Maria Suarez, a Deputy Real Estate  
22 Commissioner of the State of California, makes this Accusation  
23 in her official capacity.

24 II

25 Respondent is presently licensed and/or has license  
26 rights under the Real Estate Law (Part 1 of Division 4 of the  
27 California Business and Professions Code, "Code").  
28

1 III

2 From May 7, 2007, through the present, Respondent  
3 has been licensed by the Department of Real Estate  
4 ("Department") as a real estate salesperson, Department License  
5 No. 01806519.

6 IV

7 At no time mentioned herein has Real Estate  
8 Foreclosure Help, Inc. ever been licensed by the Department in  
9 any capacity. Real Estate Foreclosure Help, Inc. is a  
10 California corporation. Respondent is the Chief Executive  
11 Officer, Chief Financial Officer, and agent for service of  
12 process for Real Estate Foreclosure Help, Inc. On December 8,  
13 2010, a certificate of dissolution of Real Estate Foreclosure  
14 Help, Inc. was filed with the California Secretary of State.

15 V

16 At all times herein mentioned, for compensation or in  
17 expectation of compensation, Respondent engaged in the business  
18 of, acted in the capacity of, advertised or assumed to act as a  
19 real estate broker in the State of California, by soliciting  
20 borrowers, offering to negotiate loans, collect payments or  
21 perform services for borrowers in connection with loans secured  
22 directly or collaterally by liens on real property within the  
23 meaning of Code Section 10131(d).

24 VI

25 For an unknown period of time beginning no later than  
26 February 19, 2009, through June, 2009, Respondent, while using  
27 the unlicensed fictitious business name Real Estate Foreclosure  
28

1 Help, Inc., engaged in the business of soliciting borrowers or  
2 offering to perform services for borrowers including forensic  
3 loan audits, modification or negotiation in connection with  
4 loans secured by real property. In an effort to circumvent  
5 existing laws concerning the charging or collecting of advance  
6 fees by real estate brokers, Respondent and Real Estate  
7 Foreclosure Help, Inc. provided the borrowers noted below with  
8 an advance fee agreement entitled "Mortgage Loan Document Audit  
9 Agreement" for loan modification and negotiation services that  
10 said borrowers expected to receive from Respondent and Real  
11 Estate Foreclosure Help, Inc. Respondent and Real Estate  
12 Foreclosure Help, Inc. claimed, demanded, charged, received,  
13 collected or contracted for the collection of advance fees,  
14 within the meaning of Code Section 10026, for the following  
15 borrowers, among others:  
16

17         a. On or about February 19, 2009, Respondent and Real  
18 Estate Foreclosure Help, Inc. charged borrower Gloria Mateo an  
19 advance fee of \$995 pursuant to an advance fee agreement for  
20 loan modification and negotiation services in connection with a  
21 loan secured by real property.

22         b. On or about March 20, 2009, Respondent and Real  
23 Estate Foreclosure Help, Inc. charged borrower Harold Washington  
24 an advance fee of \$2,995 pursuant to an advance fee agreement  
25 for loan modification and negotiation services in connection  
26 with a loan secured by real property. Respondent and Real  
27 Estate Foreclosure Help, Inc. failed to perform the loan  
28 modification and negotiation services that had been promised to

1 Harold Washington. Respondent and Real Estate Foreclosure Help,  
2 Inc. failed to refund the advance fee paid by Harold Washington.

3 c. On or about March 24, 2009, Respondent and Real  
4 Estate Foreclosure Help, Inc. charged borrowers Edna and Cesar  
5 Guillen an advance fee of \$2,995 pursuant to an advance fee  
6 agreement for loan modification and negotiation services in  
7 connection with a loan secured by real property.

8 d. On or about June 15, 2009, Respondent and Real  
9 Estate Foreclosure Help, Inc. charged borrower, Ana Menjivar an  
10 advance fee of \$2,500 pursuant to an advance fee agreement for  
11 loan modification and negotiation services in connection with a  
12 loan secured by real property. Respondent and Real Estate  
13 Foreclosure Help, Inc. failed to perform the loan modification  
14 and negotiation services that had been promised to Ana Menjivar.  
15 Respondent and Real Estate Foreclosure Help, Inc. failed to  
16 refund the advance fee paid by Ana Menjivar.

17 e. On or about June 17, 2009, Diane Wolfrey paid an  
18 advance fee of \$1,500 to Real Estate Foreclosure Help, Inc.  
19 pursuant to an advance fee agreement for loan modification and  
20 negotiation services in connection with a loan secured by real  
21 property. Respondent and Real Estate Foreclosure Help, Inc.  
22 failed to perform the loan modification and negotiation services  
23 that had been promised to Diane Wolfrey. Respondent and Real  
24 Estate Foreclosure Help, Inc. failed to refund the advance fee  
25 paid by Diane Wolfrey.  
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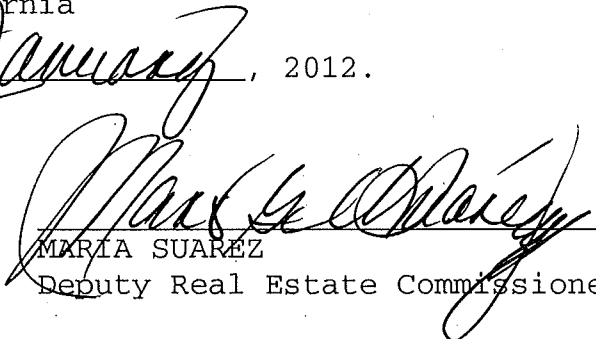
VII

The facts alleged above are in violation of Code Section 10130 and are grounds for the suspension or revocation of Respondent CHRISTOPHER NEIL RICHARDSON's real estate salesperson license under Code Sections 10177(d) and/or 10177(g).

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 licenses and license rights of Respondent CHRISTOPHER NEIL RICHARDSON under the Real Estate Law, that Complainant be awarded its costs of investigation and prosecution of this case, and for such other and further relief as may be proper under the provisions of law.

Dated at Los Angeles, California

this 24th day of January, 2012.

  
MARIA SUAREZ  
Deputy Real Estate Commissioner

cc: Christopher Neil Richardson  
Mazlat, Inc.  
Maria Suarez  
Sacto