

1 and 10131.1 (engage in the business of buying, selling or exchanging promissory notes or the
2 performance of services in connection with promissory notes secured directly or collaterally by
3 liens on real property).

4 In addition, based on that investigation, the Commissioner has determined that
5 Respondents have engaged in or are engaging in acts or are attempting to engage practices
6 constituting violations of the California Business and Professions Code ("Code"). Based on the
7 findings of that investigation, set forth below, the Commissioner hereby issues the following
8 Findings of Fact, Conclusions of Law, and Desist and Refrain Order under the authority of
9 Section 10086 of the Code.

10 All further references to FAMILY GROUP FINANCIAL include FAMILY
11 GROUP FINANCIAL 92677, FAMILY GROUP, INC., SAUGHA LLC, and MICHAEL NMN
12 BRANDT, as well as the officers, agents and employees of FAMILY GROUP FINANCIAL.
13 Respondents engaged in the activities set forth below while doing business as FAMILY GROUP
14 FINANCIAL, FAMILY GROUP FINANCIAL 92677, FAMILY GROUP, INC., SAUGHA
15 LLC, and any other fictitious business names not known at this time.

16 FINDINGS OF FACT

17 1. At no time mentioned herein have FAMILY GROUP FINANCIAL, FAMILY
18 GROUP FINANCIAL 92677, FAMILY GROUP, INC., SAUGHA LLC, and MICHAEL NMN
19 BRANDT ever been licensed by the Department in any capacity.

20 2. Within the three year period from the filing of this Order to Desist and Refrain,
21 Respondents, while doing business as FAMILY GROUP FINANCIAL engaged in activities
22 requiring a real estate broker license while operating out of several locations in Orange County,
23 California.

24 3. On or about February 17, 2010, Respondents, while doing business as
25 FAMILY GROUP FINANCIAL, FAMILY GROUP FINANCIAL 92677, FAMILY GROUP,
26 INC., and SAUGHA LLC, solicited and offered to assist borrower Marvin F., Jr. ("Marvin F.")
27 with refinance services and services in connection with the sale or purchase of promissory notes

