Department of Real Estate 320 West 4th Street, Suite 350 Los Angeles, California 90013 Telephone: (213) 576-6982



OCT 0 8 2025 DEPT. OF REAL ESTATE

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BEFORE THE DEPARTMENT OF REAL ESTATE STATE OF CALIFORNIA

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To:)	No. H-43175 LA
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	SELLER'S ADVANTAGE, INC.; and)	
)	ORDER TO DESIST
	ADELE LORAINE RAWLS TUCKER,)	AND REFRAIN
	individually and as designated officer of)	
	Seller's Advantage, Inc.;)	(B&P Code section 10086)
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The Commissioner ("Commissioner") of the California Department of Real Estate ("Department") caused an investigation to be made of the activities of SELLER'S ADVANTAGE, INC. ("SAI") and ADELE LORAINE RAWLS TUCKER ("TUCKER"), individually and as designated officer of Seller's Advantage, Inc. Based on that investigation, the Commissioner has determined that SAI and TUCKER have violated California Business and Professions Code sections 10140.6 (disclosure of licensed status (i.e., name and license number) in advertising), 10159.2 (broker supervision), 10159.5 (use of unregistered fictitious business name), 10177(c) ("[k]nowingly authorized, directed, connived at, or aided in the publication, advertisement, distribution, or circulation of a material false statement or representation concerning their designation or certification of special education, credential,

trade organization membership, or business, or concerning a business opportunity or a land or subdivision, as defined in Chapter 1 (commencing with Section 11000) of Part 2, offered for sale"), 10177(d) (willful disregard of Real Estate Law and Regulations), 10177(g) (negligence/incompetence), and 10177(h) (broker supervision) and Title 10, Chapter 6, California Code of Regulations sections 2725 (broker supervision), 2731 (use of unregistered fictitious business name), and 2773 (failure to use license number on solicitation materials. Based on the findings of that investigation, as set forth below, the Commissioner hereby issues the following Findings of Fact, Conclusions of Law, and Desist and Refrain Order pursuant to California Business and Professions Code section 10086.

FINDINGS OF FACT

License History

1. SAI¹ is presently licensed and/or has license rights under the Real Estate Law, Part 1 of Division 4 of the California Business and Professions Code as a real estate corporation (license no. 01961658). SAI was originally licensed with a broker license on or about July 31, 2014, and has been so licensed through the present. SAI's designated officer has been TUCKER from on or about March 23, 2021 through the present. SAI's prior designated officer was Stephen Patrick Couig ("Couig") (license no. 01905020) from on or about July 31, 2014 to March 22, 2021. At no time has SAI had a fictitious business name registered with the Department of Real Estate.

¹ From at least April 16, 2025 through the present, Damon Grant Lines ("Lines") (salesperson license number 01935354) has been SAI's chief executive offer and director; Paul Johnson has been SAI's chief financial officer and secretary; and Stephen Patrick Couig, David Frosh, and Doug Hopkins have been SAI's directors. Lines' responsible broker has been Tucker Real Estate, Inc. (license number 01915212) from on or about December 4, 2020 through the present. Tucker Real Estate, Inc.'s sole designated officer has been TUCKER.

 Estate Law, Part 1 of Division 4 of the California Business and Professions Code as a real estate broker (license no. 01314465). TUCKER was originally licensed with a broker license on or about December 30, 2010, and has been so licensed through the present. Previously, TUCKER was licensed with a conditional salesperson license from on or about July 7, 2001 to October 31, 2001 and a salesperson license from on or about November 1, 2001 to December 29, 2010. At no time has TUCKER had a fictitious business name registered with the Department of Real Estate. In addition to being the designated officer of SAI, TUCKER has been the designated officer of Tucker Real Estate, Inc. (license number 01915212) from on or about June 28, 2012 through the present.

Solicitations

- 3. From at least July 25, 2022 through the present, SAI and TUCKER solicited homeowners to sell their real property to SAI. These solicitations include, but are not limited to, websites, social media accounts, and commercials. In each and every website, social media account, and commercial described herein, SAI claims, "We Buy Houses For Cash, As-Is & Now," or other wording to the effect that SAI will be the buyer of the real property. However, SAI does not buy the real property itself.
- 4. When an owner contacts SAI, SAI's employee gathers information about the real property then sets up an appointment for one of SAI's "acquisition representatives" or "acquisition managers" who is not licensed with the Department of Real Estate to meet with the owner and assess the real property. The acquisition representative or manager evaluates the real property and presents an offer from Renovate Properties, LLC. If the owner accepts the offer, then SAI opens escrow, and searches for a buyer. Soon thereafter, Renovate Properties, LLC assigns its rights to the new buyer. SAI remains a part of the transaction by advising the owner on the real estate process, including, but not limited to, how

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5. Each and every website, social media account, and commercials described herein use the unregistered fictitious business name, "Seller's Advantage," to solicit owners to sell real property.

- 6. On SAI's website, www.sellersadvantage.com, SAI claims, "We Buy Houses For Cash, As-Is & Now." It states it will collect information about the real property, inspect the real property, and provide an offer, then handle the paperwork and arrange a cash transaction if the owner accepts the offer. It also names approximately eight (8) "client experience" manager/coordinators, approximately seven (7) "acquisition team" manager/coordinators, and a disposition team consisting of approximately six (6) "disposition managers," "transaction manager," "transaction coordinators," and "transaction assistant." None of these individuals are licensed with SAI as their responsible broker. This website discloses SAI's real estate license number, but it is displayed in a font smaller than the next smallest font size on the webpage.
- 7. On SAI's Facebook page, www.facebook.com/sellersadvantage, SAI and TUCKER fail to disclose SAI's and/or TUCKER's real estate license number(s).
- 8. On SAI's Instagram page, www.instagram.com/sellersadvantage, SAI and TUCKER fail to disclose SAI's real estate license number.
- 9. On SAI's LinkedIn page, www.linkedin.com/company/sellers-advantage, SAI and TUCKER fail to disclose SAI's real estate license number.
- 10. On SAI's YouTube page/channel,

 www.youtube.com/channel/UCSePfVaxHnRNaR-cBfOdQAQ, SAI and TUCKER fail to disclose SAI's real estate license number.
- 11. On the website, www.ispot.tv/ad/tvso/sellers-advantage-let-us-help-you, SAI and TUCKER advertise in a commercial featuring Doug Hopkins, one of SAI's directors who has at no time been licensed with the Department of Real Estate, soliciting homeowners

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Los Alamitos Property

in the commercial.

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but fails to include SAI's real estate license number.

On or about July 7, 2022, J. Peterson ("Seller") contacted SAI to sell 13. her house in Los Alamitos, CA ("Los Alamitos Property") in reliance on SAI's solicitation claiming SAI would present an all-cash offer with SAI being the buyer for her house in an "asin" condition.

to let SAI buy their homes with no agent fees and no repairs and "help [them] with [their]

selling situation whatever it is . . ." However, SAI does not buy the real property. In addition,

SAI's real estate license number is displayed in a font smaller than the next smallest font size

without "NO AGENCY FEES" and directs people to view its website, sellersadvantage.com,

In television commercials, SAI advertises it will purchase homes

On July 25, 2022, Nicholas "Nick" Madrid ("Madrid"), who was 14. employed by SAI but also represented Renovated Properties, LLC, met Seller at the Los Alamitos Property, inspected the Los Alamitos Property, and presented a Real Estate Purchase and Sale Agreement for the purchase of the Los Alamitos Property to Seller. Madrid went along with Seller's understanding that SAI was the buyer, and failed to explain that the buyer, Renovate Properties, LLC was a distinct and separate entity from SAI. As a result, that same day, Seller agreed and accepted the Real Estate Purchase and Sale Agreement with the belief that the buyer was SAI as stated in SAI's solicitations.

> 15. On or about July 27, 2022, Renovate Properties, LLC assigned its rights

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as the buyer to OC/LA Properties, LLC. OC/LA Properties, LLC's sole member is Michele Leigh DeVivo ("DeVivo") (salesperson license number 01376760). On or about August 3, 2022, OC/LA Properties, LLC disclosed to Seller that DeVivo, a real estate licensee, was the sole managing member OC/LA Properties, LLC.

- 16. SAI's unlicensed representatives and/or "transaction coordinators," including, but not limited to, Meggan Nielson and Melissa Eaves, advised Seller throughout the transaction.
- 17. At no time did SAI disclose to Seller that it was licensed as a real estate broker.

CONCLUSIONS OF LAW

Based on the information contained in Paragraphs 1 through 17, above,
SELLER's ADVANTAGE, INC. and ADELE LORAINE RAWLS TUCKER employed and
directed individuals who are not licensed with the Department of Real Estate in any capacity to
engage in real estate activities that require a broker license in violation of California Business
and Professions Code sections 10130 and 10131(a) ("[se]lls or offers to sell, buys or offers to
buy, solicits prospective sellers or buyers of, solicits or obtains listings of, or negotiates the
purchase, sale, or exchange of real property or a business opportunity") and violated California
Business and Professions Code sections 10140.6 (disclosure of licensed status (i.e., name and
license number) in advertising), 10159.2 (broker supervision), 10159.5 (use of unregistered
fictitious business name), 10177(c) ("[k]nowingly authorized, directed, connived at, or aided in
the publication, advertisement, distribution, or circulation of a material false statement or
representation concerning their designation or certification of special education, credential,
trade organization membership, or business, or concerning a business opportunity or a land or
subdivision, as defined in Chapter 1 (commencing with Section 11000) of Part 2, offered for
sale"), 10177(d) (willful disregard of Real Estate Law and Regulations), 10177(g)

(negligence/incompetence), and 10177(h) (broker supervision) and Title 10, Chapter 6, 1 California Code of Regulations sections 2725 (broker supervision), 2731 (use of unregistered 2 fictitious business name), and 2773 (failure to use license number on solicitation materials). 3 4 DESIST AND REFRAIN ORDER 5 IT IS HEREBY ORDERED THAT SELLER'S ADVANTAGE, INC. and 6 7 ADELE LORAINE RAWLS TUCKER, individually and as designated officer of Seller's Advantage, Inc., whether doing business under their own names or any other names or 8 fictitious names, immediately desist and refrain from employing unlicensed entities and 9 individuals from doing any acts within the State of California for which a real estate broker 10 license is required. 11 DATED: 9 24 2025 12 13 **CHIKA SUNOUIST** REAL ESTATE COMMISSIONER 14 15 16 17 **Notice:** California 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 18 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 19 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 20 (\$60,000)." 21 Seller's Advantage, Inc. 22 P.O. Box 21253 23 Riverside, CA 92516 24 Adele Loraine Rawls Tucker Providence Realty 25 3714 Sunnyside Dr. Riverside, CA 92506

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