

**SUMMARY OF ENFORCEMENT ACTIONS (ADMINISTRATIVE AND CIVIL)  
BY THE CALIFORNIA DEPARTMENT OF BUSINESS OVERSIGHT  
November 2017**

| <b>SUBJECT</b>  | <b>ACTION</b>   | <b>VIOLATIONS &amp;<br/>CHARGING SECTIONS</b>   |
|---|---|---|
| PHH Mortgage Corporation<br><br>Mount Laurel, New Jersey      | Settlement Agreement and Consent Order<br><br>November 1, 2017  | Unlawful Residential Mortgage Lending Activity<br><br>(Financial Code Sections 50302, 50314 and 50326)  |
| Howard Mark Gerber<br><br>Concord, California                 | Statement of Issues in Support of Notice of Intention to Issue Order Denying Mortgage Loan Originator License Application<br><br>November 1, 2017 | Mortgage Loan Originator License<br><br>(Financial Code Sections 22712, 50513, 22109.1 and 50141)   |
| Mortgage Lenders of America, LLC<br><br>Overland Park, Kansas | Consent Order<br><br>November 1, 2017   | Residential Mortgage Lending Activity<br><br>(Financial Code Sections 50002(a), 50202, title 10 § 1950.314.1, 50204(e) and (o) 50321, 50504, 50513 and 50326) |

| SUBJECT  | ACTION   | VIOLATIONS & CHARGING SECTIONS  |
|--|--|---|
| Daniel Esquivel<br>Oxnard, California  | Desist and Refrain Order<br>November 2, 2017                                   | Unlawful Residential Mortgage Lending Activity<br><br>(Financial Code Section 50002(d))                 |
| Ilease Works, LLC<br>Darwin, Minnesota   | Consent Order<br>November 2, 2017  | Unlawful Finance Lenders Law Activity<br><br>(Financial Code Sections 22171, 22712, 22713(c) and 22718) |
| Greater Orange County Escrow Corporation<br>Tustin, California   | Settlement Agreement<br><br>Order to Discontinue Violation<br>November 3, 2017 | Unlawful Escrow Law Activity<br><br>(Financial Code Sections 17602, 17608, 17210 and 17210(a))          |
| Jeremy John Asbra<br>Advanced Financial Concepts, Inc.<br>AFC Holdings, LLC<br>Beacon Associates, Inc.<br><br>Corona, California | Desist and Refrain Order<br>November 3, 2017                                   | Unlawful Offer and Sale of Securities<br><br>(Corporations Code Sections 25110 and 25401)               |

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|--|---|--|
| Carol Ann Pederson<br>Long Beach, California   | Desist and Refrain Order<br>November 3, 2017  | Unlawful Offer and Sale of Securities and Broker-Dealer Activity<br><br>(Corporations Code Sections 25210 and 25401) |
| Jonathan Joseph Solek<br>Temecula, California  | Accusation in Support of Order Revoking Mortgage Loan Originator License of Jonathan Joseph Solek<br>November 6, 2017 | Mortgage Loan Originator License<br><br>(Financial Code Section 50513)   |
| Simple Cash Loans, Inc. dba Montana Capital Title Loans<br><br>North Hollywood, California | Accusation/Statement of Issues<br>November 6, 2017  | Unlawful Finance Lenders Law Activity<br><br>(Financial Code Sections 22714 and 22109)                               |
| Main International Group Corporation<br>Santa Ana, California                              | Desist and Refrain Order<br><br>Consent Order<br>November 7, 2017   | Unlawful Finance Lenders Law Activity<br><br>(Financial Code Sections 22159 and 22712)                               |

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|---|---|--|
| <p>La Kaffa International Co., Ltd. dba<br/>Chatime USA, LLC</p> <p>Zhubei City, Hsinchu County, Taiwan</p> | <p>Consent Order to:</p> <p>(1) Desist and Refrain from Violations of the Franchise Investment Law;</p> <p>(2) Pay Administrative Penalties;</p> <p>(3) File Notices of Violation; and</p> <p>(4) Ancillary Relief</p> <p>November 7, 2017</p>  | <p>Unlawful Franchise Investment Law Activity</p> <p>(Corporations Code Sections 31303, 31304, 31402, 31406 and 31408)</p> |
| <p>Kevin Patrick O'Connell<br/>Town &amp; Country Lendare, LLC</p> <p>Newport Beach, California</p>         | <p>Settlement Agreement</p> <p>Order Denying the Finance Lender License Application of Town &amp; Country Lendare, LLC</p> <p>Order Suspending Kevin Patrick O'Connell from any Position of Employment, Management, or Control of any Finance Lender, Broker, or Mortgage Loan Originator</p> <p>November 7, 2017</p> | <p>Unlawful Finance Lenders Law Activity</p> <p>(Financial Code Sections 22109 and 22169(a)(2))</p>                        |

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|---|---|---|
| FOR Franchising LLC dba<br>Window Genie<br>Richard Nonelle<br><br>Cincinnati, Ohio  | Consent Order<br><br>November 14, 2017        | Unlawful Franchise Investment<br>Law Activity<br><br>(Corporations Code Sections<br>31406, 31408 and 31156) |
| iFreedom Direct Corporation<br><br>Salt Lake City, Utah   | Settlement Agreement<br><br>November 14, 2017 | Unlawful Residential Mortgage<br>Lending Activity<br><br>(Financial Code Section<br>50204(o))               |
| Juan R. Villanueva<br>Rosario Nunez<br><br>Downey, California   | Accusation<br><br>November 14, 2017           | Unlawful Escrow Law<br>Activity<br><br>(Financial Code Sections<br>17414(a)(1) and 17423)                   |
| Wisper Ventures Leasing, LLC<br>Wisper Ventures, LLC<br>William MacNamara<br>Scott Peters<br>Thomas Fencl<br>Chris McLaughlin<br><br>Prescott, Arizona<br>Scottsdale, Arizona | Settlement Agreement<br><br>November 17, 2017 | Unlawful Finance Lenders Law<br>Activity<br><br>(Financial Code Section<br>22100)                           |

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|---|--|--|
| Vitek Real Estate Industries Group, Inc.<br><br>Rancho Cordova, California      | Settlement Agreement<br><br>November 20, 2017  | Unlawful Residential Mortgage Lending Activity<br><br>(Financial Code Sections 50204(i), 50321 and 50701)  |
| Express Cash Network, Inc.<br><br>La Verne, California<br>Riverside, California | Desist and Refrain Order;<br>Order Voiding Transactions; and<br>Order Levying Administrative Penalties for Citations Issued<br><br>November 20, 2017 | Unlawful Deferred Deposit Transaction Law Activity<br><br>(Financial Code Sections 23050, 23060 and 23058) |
| Bear Flag Escrow, Inc. formerly<br>Mmrem Escrow, Inc.<br><br>Coppell, Texas     | Accusation to Revoke Escrow Agent's License<br><br>November 20, 2017   | Unlawful Escrow Law Activity<br><br>(Financial Code Section 17207(e)(1))                                   |
| Skyline Financial Corp.<br><br>Calabasas, California                            | Amendment to Consent Order<br><br>November 21, 2017  | Unlawful Residential Mortgage Lending Activity<br><br>(Financial Code Sections 50321 and 50203(a)(1))      |

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|--|---|---|
| <p>Nancy Tran</p> <p>Garden Grove, California</p>  | <p>Order Denying Petition for Reinstatement</p> <p>November 21, 2017</p>  | <p>Unlawful Escrow Law Activity</p> <p>(Government Code Section 11522)</p>  |
| <p>Bret Michael Ackerman</p> <p>Anato Advisory Services, LLC</p> <p>Santa Monica, California</p> | <p>Accusation in Support of Notice of Intention to Issue Order Barring Bret Michael Ackerman from any Position of Employment, Management or Control of any Investment Adviser, Broker-Dealer or Commodity Adviser</p> <p>Statement of Issues in Support of Notice of Intention to Issue Order Denying the Investment Adviser Application of Anato Advisory Services, LLC</p> <p>November 22, 2017</p> | <p>Unlawful Investment Adviser Activities</p> <p>(Corporations Code Sections 25230, 25232.1 and 25232(d) and (e))</p> |

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|---|---|--|
| Untouchable Films, LLC<br>Timothy Raymond-Presnel Chonacas<br><br>Beverly Hills, California<br>West Hollywood, California | Desist and Refrain Order<br><br>November 27, 2017 | Unlawful Offer and Sale of<br>Securities<br><br>(Corporations Code Section<br>25401) |