

1 Based on that investigation, the Commissioner hereby issues the following
2 Findings of Fact, Conclusions of Law, and Desist and Refrain Order under the authority of
3 Section 10086 of the Code.

4 FINDINGS OF FACT

5 1. ALL CITIES USA, INC. ("ALL CITIES") is not presently and has never
6 been licensed by the Department in any capacity. ALL CITIES is a Nevada corporation
7 registered with the California Secretary of State to do business in California. ROBERT
8 LAFLIN is the CEO and agent for service of process for ALL CITIES, which maintains
9 corporate offices located at 31878 Del Obispo St., Suite 459, San Juan Capistrano, CA 92675.
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11 2. ROBERT LAFLIN is not presently and has never been licensed by the
12 Department in any capacity. ROBERT LAFLIN is the owner and CEO of ALL CITIES. In
13 addition, ROBERT LAFLIN is the registered owner of the fictitious business name All Cities
14 USA. According to the fictitious business name statement registered with the Orange County
15 Recorders office. All Cities also maintains offices located at 27742 Paseo Esteban, San Juan
16 Capistrano, CA 92675.
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18 3. SARAH LAFLIN, aka Sara Lea, aka Sarah Ann Talley, is not presently
19 licensed by the Department. SARAH LAFLIN, formerly known as Sarah Ann Talley, was
20 licensed by the Department as a real estate salesperson from September 26, 2000 through
21 October 1, 2002, at which time her salesperson license was revoked. SARAH LAFLIN has not
22 been licensed by the Department in any capacity since October 1, 2002.
23

24 4. The parties and entities listed above have also engaged in real estate activities
25 under numerous other business names including, but not limited to, the following unlicensed
26 business names:

27 (a) www.allcitiesusa.com

1 (b) All Cities USA

2 (c) newhope4homes.com

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4 5. All further references to "Respondents" include the individuals and entities
5 listed in Paragraphs 1 through 4 above, and also include the officers, directors, employees, and
6 agents employed by or associated with said individuals and entities, who at all times were
7 engaged in the furtherance of the businesses or operations of the individuals and entities, and
8 who were acting within the course and scope of their authority and employment.
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10 6. Beginning on or around January 1, 2009, and continuing through the present
11 time, Respondents, operating as ALL CITIES USA, have engaged in the business of providing
12 loan modification, short sale and foreclosure avoidance services to homeowners nationwide.

13 7. Respondents advertised in media, through flyers and on the internet,
14 including through a website at www.allcitiesusa.com, soliciting borrowers in distress, offering
15 foreclosure avoidance, short sale and loan modification services in exchange for a fee.
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17 8. On November 29, 2010, Respondents, through the ALL CITIES USA
18 internet website <http://allcitiesusa.com> solicited borrowers facing foreclosure and offered to
19 negotiate on their behalf with lenders to obtain a loan modification and/or otherwise help them
20 save their homes for a "flat fee."

21 (a) In its promotional materials, ALL CITIES USA stated that:

22 *"There are only two types of companies that can legally assist you in your*
23 *loan modification, one is an attorney based company and the other is a Real*
24 *Estate lending company that is registered with an approved by the*
25 *Department of Real estate to process loan modifications."*
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27 (b) Neither ALL CITIES USA nor SARA LAFLIN were at that time, or have

1 become since that time, attorneys or licensed by the California Department of
2 Real Estate. Nonetheless, ALL CITIES USA stated that, "...our attorneys at
3 All Cities USA have the knowledge and experience that may help you reduce
4 your mortgage payment, reduce your interest rate, reduce your loan principal,
5 and save your home...We provide an affordable, caring and qualified service
6 for a one-time flat fee."

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8 9. Beginning on or before March 24, 2011, Respondents advertised on You
9 Tube through infomercial videos. Those videos depicted Respondent SARAH LAFLIN
10 representing distressed homeowners in California, negotiating with lenders on their behalf in
11 attempts to obtain a loan modification and prevent foreclosure. Examples of California
12 residents represented by ALL CITIES and Respondent SARAH LAFLIN included Bob K.
13 and Peter S.

14 CONCLUSIONS OF LAW

15 The conduct, acts and/or omissions of ALL CITIES USA, SARAH LAFLIN,
16 and ROBERT LAFLIN., in advertising, soliciting, and negotiating on behalf of borrowers for
17 or in expectation of compensation, and collecting fees in connection therewith when they were
18 not licensed by the Department, was in violation of Code Section 10130.
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DESIST AND REFRAIN ORDER

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2 Based on the Findings of Fact and Conclusions of Law stated herein, it is
3 hereby ordered that ALL CITIES USA, SARAH LAFLIN, and ROBERT LAFLIN, whether
4 doing business under their own names, or any other names, or any fictitious names, ARE
5 HEREBY ORDERED to immediately desist and refrain from performing any acts within the
6 State of California for which a real estate broker license is required. In particular, each of
7 them is ORDERED TO DESIST AND REFRAIN from:

8 (i) soliciting borrowers and/or performing services for borrowers or lenders in
9 connection with loans secured directly or collaterally by one or more liens on real property,
10
11 and

12 (ii) charging, demanding, claiming, collecting and/or receiving a fee for any of
13 the services offered by them to others, unless and until you obtain a real estate broker license
14 issued by the Department, and until you demonstrate and provide evidence satisfactory to the
15 Commissioner that you are in full compliance with all of the requirements of the Code and
16 Commissioner's Regulations relating to charging, collecting, and accounting for fees.
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18 DATED: 2/5/13

19
20 Real Estate Commissioner

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23 By **AWET P. KIDANE**
24 Chief Deputy Commissioner

25 **Notice:** Business and Professions Code Section 10139 provides that "Any person acting as a
26 real estate broker or real estate salesperson without a license or who advertises using words
27 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
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
(\$60,000)."

1 cc: ALL CITIES USA, INC.
2 c/o Corporate Strategy Planners, Inc.
3 Registered Agent
4 1702 A St., Ste C.
5 Sparks, NV 89431-7063

6 All Cities USA, Inc.
7 c/o Robert Laffin, CEO
8 31878 Del Obispo St.
9 San Juan Capistrano, CA 92675

10 Robert Laffin,
11 dba All Cities USA
12 27742 Paseo Estaban
13 San Juan Capistrano, CA 92675-2792

14 Robert Laffin
15 74265 Fairway Dr.
16 Palm Desert, CA 92260

17 Sara Laffin
18 27742 Paseo Esteban
19 San Juan Capistrano

20 Sara Laffin
21 Aka Sarah Lea
22 74265 Fairway Dr.
23 Palm Desert, CA 92260

24 Sarah Laffin
25 Value Real Estate Corporation
26 14 Hughes, Ste. B-102
27 Irvine, CA 92618