

1 findings of that investigation, set forth below, 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. JKCI and DSG are not now, and have never been, licensed by the Department
6 in any capacity.

7 2. On August 5, 2009 JKCI filed a Fictitious Business Name Statement with the
8 San Diego County Recorder/Clerk, registering itself under the fictitious business name for DSG.

9 3. At the times set forth below, JKCI and DSG negotiated to do one or more of
10 the following acts for another or others, for or in expectation of compensation: engaged in the
11 business of a loan modification and negotiation service and advance fee brokerage with respect
12 to loans which were secured by liens on real property for compensation or in expectation of
13 compensation and for fees collected in advance of the transaction.

14 Michael C. Transaction

15 4. On or about January 25, 2010, Michael C. entered into a Loan Modification
16 Fee Agreement with DSG in which DSG agreed to negotiate a modification of Michael C's
17 home mortgage loan in exchange for the payment of an advance fee. Michael C. paid an
18 advance fee of \$1,000 to Debt Solutions Group on February 1, 2010 and an additional advance
19 fee of \$1,000 to Debt Solutions Group on March 1, 2010.

20 David U. Transaction

21 5. On or about January 28, 2010, David U. entered into a Loan Modification Fee
22 Agreement with DSG in which DSG agreed to negotiate a modification of David U's home
23 mortgage loan in exchange for the payment of an advance fee. David U. paid an advance fee of
24 \$2,500 to Debt Solutions Group on January 27, 2010.

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1 **Notice:** Business and Professions Code Section 10139 provides that “Any person acting as a
2 real estate broker or real estate salesperson without a license or who advertises using words
3 indicating that he or she is a real estate broker without being so licensed shall be guilty of a
4 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).”

5 cc: DEBT SOLUTIONS GROUP
6 J. KEEGAN CONSULTING, INC.

7 4901 Morena Boulevard, Suite 702
8 San Diego, CA 92117
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