

STATE OF CALIFORNIA  
BUSINESS, TRANSPORTATION AND HOUSING AGENCY  
DEPARTMENT OF CORPORATIONS

TO: Behzad Aghili  
Marziyeh Vaez Tehrani a/k/a Marziyeh Aghili, a/k/a Marziyeh Shirin Tehrani  
1122 Deanne Drive  
Menlo Park, CA 94025

Behzad Aghili, Marziyeh Aghili and Sandhu S. Kalwant doing business as:

AAA Financial Services  
American Fair Credit  
NeoFinancial.com  
Neo Financial Services of Sunnyvale  
333 Maude Avenue #105  
Sunnyvale, CA 94086

910 Shell Avenue  
Concord, CA 94520

1129 B Street  
Hayward, CA 94541

AAA Financial Services, Inc.  
Neo Financial Management Group  
Neo Financial Services, Inc.  
Neo Management Group, Inc  
26291 Production Avenue  
Suites 6 and 205  
Hayward, CA 94545

Tom Coates, Director  
Consumer Credit of Des Moines  
doing business as:  
CCC of Des Moines, IA  
Consumer Credit of Iowa (CC of Iowa)  
Consumers Credit Counseling of Des Moines  
Neo Credit Management of Des Moines, Iowa  
(NCM of Des Moines, IA)  
6129 W.W. 63<sup>rd</sup> Street  
P.O. Box 21220  
Des Moines, Iowa 50321

**DESIST AND REFRAIN ORDER**

The California Corporations Commissioner finds that:

1. Individuals Behzad Aghili, Marziyeh Vaez Tehrani a/k/a Marziyeh Aghili, a/k/a Marziyeh Shirin Tehrani and Sandhu S. Kalwant (hereinafter "Individuals") conducted business under several fictitious business names or as California corporations including, but not limited to, AAA Financial Services, American Fair Credit, NeoFinancial.com, Neo Financial Services of Sunnyvale, AAA Financial Services, Inc., Neo Financial Management Group, Neo Financial Services, Inc. and Neo Management Group, Inc. (hereinafter "Entities").

1           2.       Individual Tom Coates, at all relevant times, was the Director of Consumer  
2 Credit of Des Moines, which also did business as CCC of Des Moines, IA, Consumer Credit  
3 of Iowa (CC of Iowa), Consumers Credit Counseling of Des Moines and Neo Credit  
4 Management of Des Moines, Iowa (NCM of Des Moines, IA) (hereinafter "Entities").

5           3.       The above-named Individuals and Entities, working in concert or participation  
6 among themselves or with others, engaged in the following activities in violation of the  
7 Check Sellers, Bill Payers and Proraters Law pursuant to the California Financial Code  
8 section 12000 et seq.

9           4.       The above named Individuals and Entities offer their services to California  
10 consumers in newspaper advertisements, at their offices in California and via the Internet at  
11 a Web site located at NeoFinancial.com. These services included their "Debt & Interest  
12 Restructuring Program," "Debt Restructuring Program," debt management programs,  
13 repayment plans and/or financial advisory services. These programs and services involve  
14 negotiations of repayment plans with creditors of consumers whereby the Individuals and  
15 Entities or others, acting in concert or participation with them, will receive money from the  
16 consumer for the purpose of negotiating with and/or paying a consumer's creditors.  
17 Individuals or Entities included testimonials and the following representations to consumers:

18                   We combine people's unsecured debts into one low affordable  
19                   monthly payment, reduce or eliminate the interest rate, shorten the  
20                   term and by doing so save you thousands of dollars.

21           5.       In exchange for these services California consumers were charged  
22 and required to pay to Individuals or Entities an initial non-refundable retainer or set up fee  
23 of not less than \$300 and a monthly fee of approximately \$25 to \$50. Consumers also pay  
24 additional fees for any electronic funds transferred through the Automated Clearing House  
25 (ACH), whereby Individuals and Entities initiated withdrawals from a consumer's bank  
26 account(s) for payment to a consumer's creditors.

27       ///  
28       ///

1           6.       A description by the Individuals and Entities of the services of the "Debt &  
2 Interest Restructuring Program" includes working with the consumer and creditors of the  
3 consumer to arrange a payment schedule, wherein payments are distributed monthly by the  
4 Individuals and Entities on behalf of the consumer to the creditors of the consumer. Alleged  
5 benefits associated with the "Debt & Interest Restructuring Program" include reduced or  
6 eliminated debts, fees and interest rates or other "interest concessions." Individuals or  
7 Entities offer consumers a free consultation via their toll-free numbers (800) 525-7223 or  
8 (888) 325-2227, and promise consumers that they "will reap the many benefits of our  
9 program." Individuals or Entities stated that "[w]e have been providing financial services for  
10 over ten years" and their program has "thousands of active clients."

11           7.       The Department of Corporations has jurisdiction over and regulates proraters  
12 under the Check Sellers, Bill Payers and Proraters Law set forth in California Financial Code  
13 section 12000 et seq. California Financial Code section 12200, states:

14                   No person shall engage in the business, for compensation, of  
15 selling checks, drafts, money orders, or other commercial  
16 paper serving the same purpose, or of receiving money as  
17 agent of an obligor for the purpose of paying bills, invoices, or  
18 accounts of such obligor, or acting as a prorater, nor shall any  
19 person, without direct compensation and not as an authorized  
20 agent for a utility company, accept money for the purpose of  
21 forwarding it to others in payment of utility bills, without first  
22 obtaining a license from the commissioner.

23           8.       The California Corporations Commissioner has not licensed in this State to  
24 act as a check seller, bill payer or prorater any of the following Individuals or Entities:  
25 Behzad Aghili, Marziyeh Vaez Tehrani a/k/a Marziyeh Aghili, a/k/a Marziyeh Shirin Tehrani,  
26 Sandhu S. Kalwant, Tom Coates, AAA Financial Services, American Fair Credit,  
27 NeoFinancial.com, Neo Financial Services of Sunnyvale, AAA Financial Services, Inc., Neo  
28 Financial Management Group, Neo Financial Services, Inc., Neo Management Group, Inc.,  
Consumer Credit of Des Moines, CCC of Des Moines, IA, Consumer Credit of Iowa (CC of  
Iowa) Consumers Credit Counseling of Des Moines and Neo Credit Management of Des  
Moines, Iowa (NCM of Des Moines, IA.)

1           9.     Based upon the foregoing findings, the California Corporations Commissioner  
2 is of the opinion that Behzad Aghili, Marziyeh Vaez Tehrani a/k/a Marziyeh Aghili, a/k/a  
3 Marziyeh Shirin Tehrani, Sandhu S. Kalwant, Tom Coates, AAA Financial Services,  
4 American Fair Credit, NeoFinancial.com, Neo Financial Services of Sunnyvale, AAA  
5 Financial Services, Inc., Neo Financial Management Group, Neo Financial Services, Inc.,  
6 Neo Management Group, Inc., Consumer Credit of Des Moines, CCC of Des Moines, IA,  
7 Consumer Credit of Iowa (CC of Iowa), Consumers Credit Counseling of Des Moines and  
8 Neo Credit Management of Des Moines, Iowa (NCM of Des Moines, IA), in concert and/or in  
9 participation with others, have been engaging in the business of check selling, bill paying  
10 and prorating as defined in the Check Sellers, Bill Payers and Proraters Law without a  
11 license from the California Corporations Commissioner.

12           Pursuant to Financial Code section 12103, the California Corporations  
13 Commissioner hereby orders Behzad Aghili, Marziyeh Vaez.Tehrani a/k/a Marziyeh Aghili,  
14 a/k/a Marziyeh Shirin Tehrani, Sandhu S. Kalwant, Tom Coates, AAA Financial Services,  
15 American Fair Credit, NeoFinancial.com, Neo Financial Services of Sunnyvale, as well as  
16 AAA Financial Services, Inc., Neo Financial Management Group, Neo Financial Services,  
17 Inc., Neo Management Group, Inc., Consumer Credit of Des Moines, CCC of Des Moines,  
18 IA, Consumer Credit of Iowa (CC of Iowa), Consumers Credit Counseling of Des Moines  
19 and Neo Credit Management of Des Moines, Iowa (NCM of Des Moines, IA), individually,  
20 in concert and/or participation with others, to desist and refrain from engaging in the  
21 business as a check seller, bill payer or prorater unless and until they are licensed or  
22 exempt. This Order is necessary, in the public interest, and for the protection of  
23 consumers.

24 Dated: April 16, 2003 at Los Angeles, California

25                                   DEMETRIOS A. BOUTRIS  
26                                   California Corporations Commissioner

27                                   By \_\_\_\_\_

28                                   ALAN S. WEINGER, Supervising Counsel  
                                      Enforcement and Legal Services Division