STATE OF ILLINOIS

DEPARTMENT OF FINANCIAL AND PROFESSIONAL REGULATION

DIVISION OF BANKING

IN THE MATTER OF:	)	
	)	No. 2026-MLO-01
LUIS AILLON	)	
License No. 031.0007228; NMLS ID 225862	)	
	)	

ORDER REVOKING
MORTGAGE LOAN ORIGINATOR LICENSE

The DEPARTMENT OF FINANCIAL AND PROFESSIONAL REGULATION, DIVISION OF BANKING ("Department"), having investigated the activities of **LUIS AILLON ("AILLON")**, and making findings under the Residential Mortgage License Act of 1987 ("Act") [205 ILCS 635], and the rules promulgated thereunder ("Rules") [38 Ill. Adm. Code 1050], hereby issues this **ORDER REVOKING MORTGAGE LOAN ORIGINATOR LICENSE.**

STATUTORY PROVISIONS

1. Section 7-11 of the Act authorizes the Director of the Department's Division of Banking ("Director") to revoke and/or fine, or otherwise discipline, the license of a mortgage loan originator ("MLO") if the Director finds that the MLO has violated the Act or any other applicable law or regulation.

2. Section 7-13 of the Act provides that it is a violation of the Act for a mortgage loan originator to: Subsection (1) Directly or indirectly employ any scheme, device, or artifice to defraud or mislead borrowers or lenders or to defraud any person; Subsection (2) Engage in any unfair or deceptive practice toward any person; Subsection (3) Obtain property by fraud or misrepresentation; Subsection (7) Fail to make disclosures as required by the Act and any other applicable State or federal law, including regulations thereunder; Subsection (8) Fail to comply with the Act or rules or regulations under the Act, or fail to comply with any other state or federal law, including the rules and regulations thereunder, applicable to any business authorized or conducted under the Act; Subsection (15) Engage in conduct that constitutes dishonest dealings; and Subsection (21) Structure activities or contracts to evade provisions of the Act.

FACTUAL FINDINGS

3. AILLON is an Illinois MLO holding License No. 031.0007228, which was in an active status for the time period covered by this Order and is, and has been, subject to the Department's regulatory authority under the Act at all relevant times.

4. AILLON is the sole owner of and is sponsored by X-Pert Mortgage of Illinois, Inc. ("X-PERT"), a residential mortgage licensee holding Illinois Residential Mortgage License No. MB.6760597 since March 31, 2011.

5. The Department became aware of an investigation by the U.S. Department of Housing and Urban Development ("HUD") into fraud schemes involving X-PERT and AILLON and conducted its own investigation commencing in August 2023.

6. Roxana Aranibar ("Aranibar") is an individual who had previously been disciplined by the Department in May 2014 (2014-MLO-CD-3) for unlicensed loan origination and loan modification through her company MRC Consultant Corporation ("MRC"). Aranibar at that time colluded with a licensed entity and an MLO to have Aranibar and MRC prepare loan applications and send them to her licensed collaborators, who signed off on the completed applications as if they had themselves originated the loans in order to fund and close the loans.

7. Aranibar, since the 2014 order, has started a new company, RCS Marketing Corp. ("RCS"), which purportedly handles marketing and tax preparation.

8. AILLON, through his company X-PERT, hired Aranibar through her company RCS in January 2019 as a sales assistant to market, follow up with customers, and gather documentation. Most importantly, RCS was used to bring in complete loan files to X-Pert that Aranibar originated as an unlicensed MLO. X-PERT paid Aranibar though RCS, as an independent contractor for this work.

9. AILLON, through his company X-PERT, permitted borrowers to meet with Aranibar at a location that was not a licensed full service office or branch of X-PERT.

10. AILLON, through his company X-PERT, enabled and encouraged Aranibar, an unlicensed MLO, to meet borrowers, take loan applications, and collect sensitive financial documentation from these borrowers. Aranibar also collected borrowers' payments, which were made directly to her. Aranibar would then hand over the complete file to AILLON, or his company, X-PERT.

11. Through the HUD investigation, one (1) borrower was interviewed for whom Aranibar originated loans, and the HUD investigator found the following:

    a. The borrower never heard of X-PERT or AILLON.
    b. The borrower never went to an office of X-PERT.
    c. The borrower only worked with Aranibar.
    d. The file contained "Letters of Explanation" which the consumer denied signing.

12. Through the Department's investigation, three more borrowers were interviewed for whom Aranibar originated loans, and the Department's investigator found the following:

    a. Borrowers never heard of X-PERT or Luis Aillon

b. Some borrowers went to a branch office of X-PERT, but only met with and worked with Aranibar.
c. One borrower went to both an X-PERT branch office and Aranibar's unlicensed office. Both times, the borrower only worked with Aranibar.

13. AILLON, through his company X-PERT, accepted the files from Aranibar knowing the information had not been collected, verified or prepared by himself or any of X-PERT's licensed MLOs. AILLON affixed his name and MLO credentials to the loan application to ensure that the loan would be funded.

14. AILLON, through his company X-PERT, allowed Aranibar, through RCS, to process loans for X-PERT without being properly registered as an Exempt Entity Processor ("EEP"), which X-PERT knew and allowed.

15. AILLON, through his company X-PERT, was compensated for each loan transaction without actually originating the loan.

LEGAL CONCLUSIONS

16. AILLON, through his company X-Pert Mortgage of Illinois, Inc., schemed with an unlicensed MLO, acted unsafely, unsoundly, and unlawfully by accepting loan files from an unqualified individual, accepted files which had been processed by an unlicensed individual who did not have a license exemption, and knew or should have known the accepted files contained fraudulent documents or other potential defects and closed the loan files with his MLO license in violation of Sections 7-13(1), (2), (3), (7), (8), (15) & (21) of the Act.

NOW IT IS HEREBY ORDERED THAT,

The Department **REVOKES** LUIS AILLON's Mortgage Loan Originator License No. 031.0007228 pursuant to Section 7-11 of the Act.

ORDERED THIS 2ND DAY OF MARCH 2026

ILLINOIS DEPARTMENT OF FINANCIAL AND PROFESSIONAL REGULATION
DIVISION OF BANKING

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SUSANA SORIANO
ACTING DIRECTOR

You are hereby notified that this Order is an administrative decision. Pursuant to Section 4-12 of the Illinois Residential Mortgage License Act [205 ILCS 635/4-12] and the rules promulgated thereunder on Hearings Before the Division of Banking and Division of Financial Institutions [38 Ill. Adm. Code 100.5 *et seq.*], an affected party may file a petition for a hearing on an administrative decision by the Director. The petition for a hearing must be filed within 10 days after service of this Order by mail to the Department at 555 W. Monroe St., Suite 500, Chicago, IL 60661, Attn: Angela Alexandrakis with an electronic copy by email to Angela.Alexandrakis@illinois.gov and fpr.doblegal@illinois.gov. The petition for hearing must be in writing and set forth the petitioner's license number, docket number of the administrative decision that resulted in discipline, and date of the administrative decision, pursuant to 38 Ill. Adm. Code 100.30(c). An MLO that requests a hearing shall pay a $250 nonrefundable fee to the Department in accordance with 38 Ill. Adm. Code 1050.210(f) or through the Nationwide Multistate Licensing System. After receipt of a properly completed and timely petition for hearing, a case will be docketed and notice sent to the petitioner setting forth the date, time, and place of the hearing. Absent a petition for a hearing, this Order shall constitute a final administrative decision subject to the Administrative Review Law [735 ILCS 5/3-101 *et seq.*].