

1 Department of Real Estate
2 P. O. Box 187000
3 Sacramento, CA 95818-7000
4
5 Telephone: (916) 227-0789
6
7

FILED
APR 20 2001

DEPARTMENT OF REAL ESTATE

By *Lucie A. Zan*

8 BEFORE THE DEPARTMENT OF REAL ESTATE

9 STATE OF CALIFORNIA

10 * * *

11 In the Matter of the Accusation of) No. H-2581 SD
12 DANIEL M. GREER,) OAH No. L-2000120079
13 PICKFORD REALTY, INC.,)
14 STEPHEN CHARLES GAMES,) STIPULATION AND AGREEMENT
15 Respondents.)

16 It is hereby stipulated by and between PICKFORD
17 REALTY, INC. (hereinafter "Respondent PICKFORD"), and STEPHEN
18 CHARLES GAMES (hereinafter "Respondent GAMES") and their
19 attorney of record Peter K. Solecki and Complainant, acting by
20 and through David A. Peters, Counsel for the Department of Real
21 Estate, as follows for purpose of settling and disposing of the
22 Accusation filed on October 5, 2000 in this matter. This
23 Stipulation and Agreement relates to Respondents PICKFORD and
24 GAMES only.

25 1. All issues which were to be contested and all
26 evidence which was to be presented by Complainant and
27 Respondents PICKFORD and GAMES at a formal hearing on the

1 Accusation, which hearing was to be held in accordance with the
2 provisions of the Administrative Procedure Act (APA) (Government
3 Code Section 11500 et seq.), shall instead and in place thereof
4 be submitted solely on the basis of the provisions of this
5 Stipulation and Agreement.

6 2. Respondents PICKFORD and GAMES have received,
7 read and understand the Statement to Respondents, the Discovery
8 Provisions of the APA, and the Accusation filed by the
9 Department of Real Estate in this proceeding.

10 3. On October 19, 2000, Respondents PICKFORD and
11 GAMES filed their Notice of Defense pursuant to Section 11505 of
12 the Government Code for the purpose of requesting a hearing on
13 the allegations in the Accusation. Respondents PICKFORD and
14 GAMES freely and voluntarily withdraw their Notice of Defense.
15 Respondents PICKFORD and GAMES acknowledge that by withdrawing
16 said Notice of Defense they will thereby waive their right to
17 require the Commissioner to prove the allegations in the
18 Accusation at a contested hearing held in accordance with the
19 provisions of the APA and that they will waive other rights
20 afforded to them in connection with the hearing such as the
21 right to present evidence in defense of the allegations in the
22 Accusation and the right to cross-examine witnesses.

23 4. This Stipulation is based on the factual
24 allegations contained in the Accusation. In the interests of
25 expedience and economy, Respondents PICKFORD and GAMES choose
26 not to contest these allegations, but to remain silent and
27 understand that, as a result thereof, these factual allegations,

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I

The conduct of Respondent PICKFORD, as described in the Accusation, constitutes cause for the suspension of revocation of the real estate license and license rights of Respondent PICKFORD under the provisions of Section 10137 of the Business and Professions Code.

II

The conduct of Respondent GAMES, as described in the Accusation, constitutes cause for the suspension or revocation of the real estate license and license rights of Respondent GAMES under the provisions of Section 10177(g) of the Business and Professions Code.

ORDER

A. All licenses and licensing rights of Respondent PICKFORD REALTY, INC. under the Real Estate Law are suspended for a period of ninety (90) days from the effective date of this Order; provided, however, that:

- 1. Fifty (50) days of said suspension shall be stayed for one (1) year upon the following terms and conditions:
 - (a) Respondent shall obey all laws, rules and regulations governing the rights, duties, and responsibilities of a real estate licensee in the State of California; and
 - (b) No final subsequent determination be made, after hearing or upon stipulation, that cause for disciplinary action occurred within one (1) year from the effective date of this Order. Should

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such a determination be made, the Commissioner may, in her discretion, vacate and set aside the stay order and reimpose all or a portion of the stayed suspension. Should no such determination be made, the stay imposed herein shall become permanent.

2. The remaining forty (40) days of said 90-day suspension shall be stayed upon the condition that Respondent PICKFORD petitions pursuant to Section 10175.2 of the Business and Professions Code and pays a monetary penalty pursuant to Section 10175.2 of the Business and Professions Code at a rate of \$250.00 for each day of the suspension for a total monetary penalty of \$10,000.00:

(a) Said payment shall be in the form of a cashier's check or certified check made payable to the Recovery Account of the Real Estate Fund. Said check must be delivered to the Department prior to the effective date of the Order in this matter.

(b) No further cause for disciplinary action against the real estate license of Respondent PICKFORD occurs within one (1) year from the effective date of the decision in this matter.

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1 (c) If Respondent PICKFORD fails to pay the monetary
2 penalty in accordance with the terms and
3 conditions of the Order, the Commissioner may,
4 without a hearing, order the immediate execution
5 of all or any part of the stayed suspension in
6 which event Respondent PICKFORD shall not be
7 entitled to any repayment nor credit, prorated or
8 otherwise, for the money paid to the Department
9 under the terms of this Order.

10 (d) If Respondent PICKFORD pays the monetary penalty
11 and if no further cause for disciplinary action
12 against the real estate license of Respondent
13 PICKFORD occurs within the one (1) year from the
14 effective date of the decision, the stay hereby
15 granted shall become permanent.

16 B. All licenses and licensing rights of Respondent
17 STEPHEN CHARLES GAMES under the Real Estate Law are suspended
18 for a period of ninety (90) days from the effective date of this
19 Order; provided, however, that:

20 1. Fifty (50) days of said suspension shall be
21 stayed for one (1) year upon the following terms and conditions:

22 (a) Respondent shall obey all laws, rules and
23 regulations governing the rights, duties, and
24 responsibilities of a real estate licensee in the
25 State of California; and

26 ///

27 ///

1 (b) No final subsequent determination be made, after
2 hearing or upon stipulation, that cause for
3 disciplinary action occurred within one (1) year
4 from the effective date of this Order. Should
5 such a determination be made, the Commissioner
6 may, in her discretion, vacate and set aside the
7 stay order and reimpose all or a portion of the
8 stayed suspension. Should no such determination
9 be made, the stay imposed herein shall become
10 permanent.

11 2. The remaining forty (40) days of said 90-day
12 suspension shall be stayed upon the condition that Respondent
13 GAMES petitions pursuant to Section 10175.2 of the Business and
14 Professions Code and pays a monetary penalty pursuant to Section
15 10175.2 of the Business and Professions Code at a rate of
16 \$250.00 for each day of the suspension for a total monetary
17 penalty of \$10,000.00:

18 (a) Said payment shall be in the form of a cashier's
19 check or certified check made payable to the
20 Recovery Account of the Real Estate Fund. Said
21 check must be delivered to the Department prior
22 to the effective date of the Order in this
23 matter.

24 (b) No further cause for disciplinary action against
25 the real estate license of Respondent GAMES
26 occurs within one (1) year from the effective
27 date of the Decision in this matter.

1 (c) If Respondent GAMES fails to pay the monetary
2 penalty in accordance with the terms and
3 conditions of the Order, the Commissioner may,
4 without a hearing, order the immediate execution
5 of all or any part of the stayed suspension in
6 which event Respondent GAMES shall not be
7 entitled to any repayment nor credit, prorated or
8 otherwise, for the money paid to the Department
9 under the terms of this Order.

10 (d) If Respondent GAMES pays the monetary penalty and
11 if no further cause for disciplinary action
12 against the real estate license of Respondent
13 GAMES occurs within the one (1) year from the
14 effective date of the decision, the stay hereby
15 granted shall become permanent.

16 2/28/01
17 _____
18 DATED

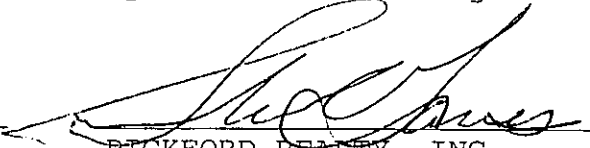
16 *David A. Peters*
17 _____

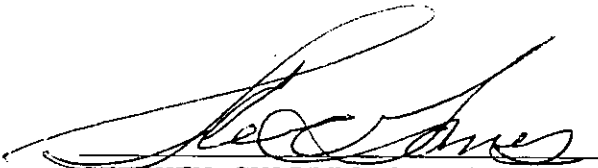
18 DAVID A. PETERS, Counsel
19 DEPARTMENT OF REAL ESTATE

19 * * *

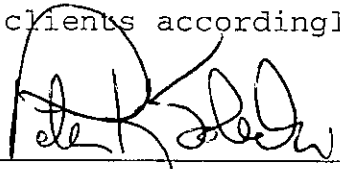
20 I have read the Stipulation and Agreement, have
21 discussed it with my counsel, and its terms are understood by
22 me and are agreeable and acceptable to me. I understand that I
23 am waiving rights given to me by the California Administrative
24 Procedure Act (including but not limited to Sections 11506,
25 11508, 11509, and 11513 of the Government Code), and I
26 willingly, intelligently, and voluntarily waive those rights,
27 including the right of requiring the Commissioner to prove the

1 allegations in the Accusation at a hearing at which I would
2 have the right to cross-examine witnesses against me and to
3 present evidence in defense and mitigation of the charges.

4
5 2-20-01
6 DATED 
7 PICKFORD REALTY, INC.
8 By: Stephen Charles Games
9 Respondent

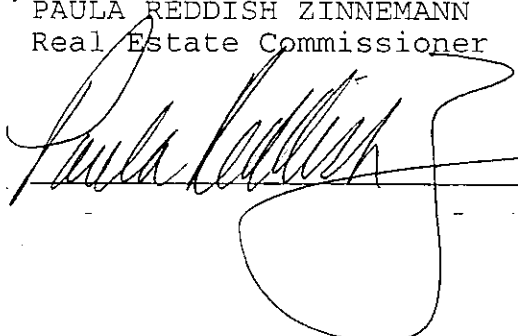
10
11 2-20-01
12 DATED 
13 STEPHEN CHARLES GAMES
14 Respondent

15 I have reviewed the Stipulation and Agreement as to
16 form and content and have advised my clients accordingly.

17
18 February 16, 2001
19 DATED 
20 PETER K. SOLECKI
21 Attorney for Respondents

22 * * *

23 The foregoing Stipulation and Agreement for
24 Settlement is hereby adopted by the Real Estate Commissioner as
25 her Decision and Order and shall become effective at 12 o'clock
26 noon on _____ May 11 _____, 2001.

27
28 IT IS SO ORDERED April 9, 2001.
29
30 PAULA REDDISH ZINNEMANN
31 Real Estate Commissioner


1 Department of Real Estate
2 P. O. Box 187000
3 Sacramento, CA 95818-7000
4 Telephone: (916) 227-0789

FILED
APR 20 2001

DEPARTMENT OF REAL ESTATE
Lucia L. Jan

8 BEFORE THE DEPARTMENT OF REAL ESTATE

9 STATE OF CALIFORNIA

10 * * *

11 In the Matter of the Accusation of)	No. H-2581 SD
)	
12 DANIEL M. GREER,)	OAH No. L-2000120079
13 PICKFORD REALTY, INC.,)	
14 STEPHEN CHARLES GAMES,)	<u>STIPULATION AND AGREEMENT</u>
)	
15 Respondents.)	

16 It is hereby stipulated by and between DANIEL M. GREER
17 (hereinafter "Respondent GREER"), and his attorney of record
18 Robert E. Muir and Complainant, acting by and through David A.
19 Peters, Counsel for the Department of Real Estate, as follows
20 for purpose of settling and disposing of the Accusation filed on
21 October 5, 2000 in this matter. This Stipulation and Agreement
22 relates to Respondent GREER only.

23 1. All issues which were to be contested and all
24 evidence which was to be presented by Complainant and Respondent
25 GREER at a formal hearing on the Accusation, which hearing was
26 to be held in accordance with the provisions of the
27 Administrative Procedure Act (APA) (Government Code Section

1 11500 et seq.), shall instead and in place thereof be submitted
2 solely on the basis of the provisions of this Stipulation and
3 Agreement.

4 2. Respondent GREER has received, read and
5 understands the Statement to Respondents, the Discovery
6 Provisions of the APA, and the Accusation filed by the
7 Department of Real Estate in this proceeding.

8 3. On October 25, 2000, Respondent GREER filed their
9 Notice of Defense pursuant to Section 11505 of the Government
10 Code for the purpose of requesting a hearing on the allegations
11 in the Accusation. Respondent GREER freely and voluntarily
12 withdraws his Notice of Defense. Respondent GREER acknowledges
13 that by withdrawing said Notice of Defense he will thereby waive
14 his right to require the Commissioner to prove the allegations
15 in the Accusation at a contested hearing held in accordance with
16 the provisions of the APA and that he will waive other rights
17 afforded to him in connection with the hearing such as the right
18 to present evidence in defense of the allegations in the
19 Accusation and the right to cross-examine witnesses.

20 4. This Stipulation is based on the factual
21 allegations contained in the Accusation. In the interests of
22 expedience and economy, Respondent GREER chooses not to contest
23 these allegations, but to remain silent and understand that, as
24 a result thereof, these factual allegations, without being
25 admitted or denied, will serve as prima facia basis for the
26 disciplinary action stipulated to herein. The Real Estate

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1 Commissioner shall not be required to provide further evidence
2 to prove said factual allegations.

3 5. It is understood by the parties that the Real
4 Estate Commissioner may adopt the Stipulation and Agreement as
5 her Decision in this matter, thereby imposing the penalty and
6 sanctions on Respondent's real estate license and license rights
7 as set forth in the below "Order". In the event that the
8 Commissioner in her discretion does not adopt the Stipulation
9 and Agreement, it shall be void and of no effect, and Respondent
10 GREER shall retain the right to a hearing and proceeding on the
11 Accusation under all the provisions of the APA and shall not be
12 bound by any admission or waiver made herein.

13 6. The Order or any subsequent Order of the Real
14 Estate Commissioner made pursuant to this Stipulation and
15 Agreement shall not constitute an estoppel, merger or bar to any
16 further administrative or civil proceedings by the Department of
17 Real Estate with respect to any matters which were not
18 specifically alleged to be causes for accusation in this
19 proceeding.

20 DETERMINATION OF ISSUES

21 By reason of the foregoing stipulations, admissions
22 and waivers, and solely for the purpose of settlement of the
23 pending Accusation without a hearing, it is stipulated and
24 agreed that the following determination of issues shall be made:

25 I

26 The conduct of Respondent GREER, as described in the
27 Accusation, constitutes cause for the suspension or revocation

1 of the real estate license and license rights of Respondent
2 GREER under the provisions of Section 10177(d) of the Business
3 and Professions Code in conjunction with Section 10130 of the
4 Business and Professions Code.

5 ORDER

6 A. All licenses and licensing rights of Respondent
7 GREER under the Real Estate Law are suspended for a period of
8 ninety (90) days from the effective date of this Order;
9 provided, however, that:

10 1. Fifty (50) days of said suspension shall be
11 stayed for two (2) years upon the following terms and
12 conditions:

13 (a) Respondent shall obey all laws, rules and
14 regulations governing the rights, duties, and
15 responsibilities of a real estate licensee in the
16 State of California; and

17 (b) No final subsequent determination be made, after
18 hearing or upon stipulation, that cause for
19 disciplinary action occurred within two (2) years
20 from the effective date of this Order. Should
21 such a determination be made, the Commissioner
22 may, in her discretion, vacate and set aside the
23 stay order and reimpose all or a portion of the
24 stayed suspension. Should no such determination
25 be made, the stay imposed herein shall become
26 permanent.

27 ///

1 2. The remaining forty (40) days of said 90-day
2 suspension shall be stayed upon the condition that Respondent
3 PICKFORD petitions pursuant to Section 10175.2 of the Business
4 and Professions Code and pays a monetary penalty pursuant to
5 Section 10175.2 of the Business and Professions Code at a rate
6 of \$250.00 for each day of the suspension for a total monetary
7 penalty of \$10,000.00:

8 (a) Said payment shall be in the form of a cashier's
9 check or certified check made payable to the
10 Recovery Account of the Real Estate Fund. Said
11 check must be delivered to the Department prior
12 to the effective date of the Order in this
13 matter.

14 (b) No further cause for disciplinary action against
15 the real estate license of Respondent GREER
16 occurs within two (2) years from the effective
17 date of the decision in this matter.

18 (c) If Respondent GREER fails to pay the monetary
19 penalty in accordance with the terms and
20 conditions of the Order, the Commissioner may,
21 without a hearing, order the immediate execution
22 of all or any part of the stayed suspension in
23 which event Respondent GREER shall not be
24 entitled to any repayment nor credit, prorated or
25 otherwise, for the money paid to the Department
26 under the terms of this Order.

27 ///

1 (d) If Respondent GREER pays the monetary penalty and
2 if no further cause for disciplinary action
3 against the real estate license of Respondent
4 GREER occurs within the two (2) years from the
5 effective date of the decision, the stay hereby
6 granted shall become permanent.

7
8 2/28/01
9 DATED

David A. Peters
10 DAVID A. PETERS, Counsel
11 DEPARTMENT OF REAL ESTATE

12 * * *

13 I have read the Stipulation and Agreement, have
14 discussed it with my counsel, and its terms are understood by
15 me and are agreeable and acceptable to me. I understand that I
16 am waiving rights given to me by the California Administrative
17 Procedure Act (including but not limited to Sections 11506,
18 11508, 11509, and 11513 of the Government Code), and I
19 willingly, intelligently, and voluntarily waive those rights,
20 including the right of requiring the Commissioner to prove the
21 allegations in the Accusation at a hearing at which I would
22 have the right to cross-examine witnesses against me and to
23 present evidence in defense and mitigation of the charges.

24 2/14/01
25 DATED

Daniel M. Greer
26 DANIEL M. GREER
27 Respondent

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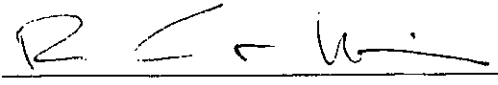
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I have reviewed the Stipulation and Agreement as to form and content and have advised my client accordingly.

2-20-01

DATED



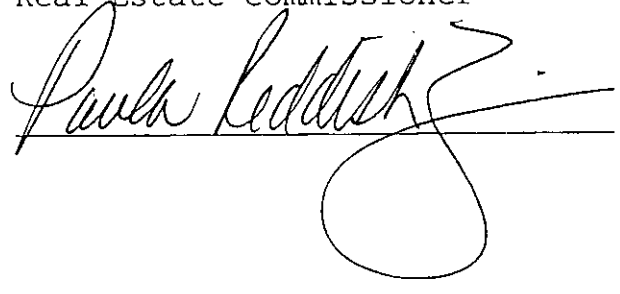
ROBERT E. MUIR
Attorney for Respondent

* * *

The foregoing Stipulation and Agreement for Settlement is hereby adopted by the Real Estate Commissioner as her Decision and Order and shall become effective at 12 o'clock noon on May 11, 2001.

IT IS SO ORDERED April 9, 2001.

PAULA REDDISH ZINNEMANN
Real Estate Commissioner



1 Department of Real Estate
P. O. Box 187000
2 Sacramento, CA 95818-7000
3 Telephone: (916) 227-0789
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FILED
JUN 29 2001

DEPARTMENT OF REAL ESTATE
By *Laurie A. Zani*

8 BEFORE THE DEPARTMENT OF REAL ESTATE
9 STATE OF CALIFORNIA

10 * * *

11 In the Matter of the Accusation of)	No. H-2581 SD
)	
12 DANIEL M. GREER,)	OAH No. L-2000120079
PICKFORD REALTY, INC.,)	
13 STEPHEN CHARLES GAMES,)	<u>ORDER MODIFYING ORDER IN</u>
)	<u>STIPULATION AND AGREEMENT</u>
14 Respondents.)	<u>AS TO DANIEL M. GREER</u>
)	

15
16 The Order in the Stipulation and Agreement between the
17 Department and Respondent DANIEL M. GREER (hereinafter
18 "Respondent GREER") in this matter is hereby modified as
19 follows:

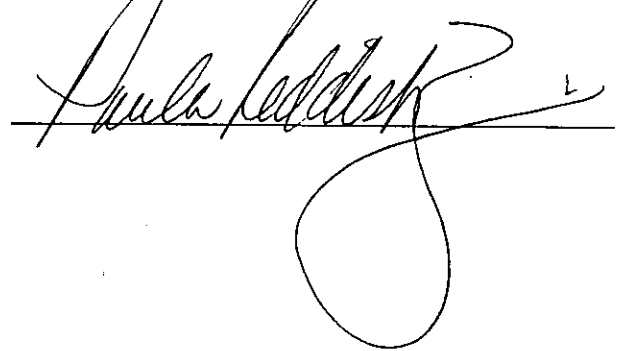
20 The fifty (50) day stayed suspension described in
21 Paragraph A(1) of the Order began on the effective date of the
22 Order, May 11, 2001. The remaining forty (40) day suspension
23 described in Paragraph A(2) of the Order will begin on July 2,
24 2001. If Respondent GREER chooses to pay a \$10,000 monetary
25 penalty in lieu of said suspension, said monetary payment
26 certified check must be delivered to the Department not later
27 ///

1 than July 2, 2001 and otherwise comply with all the requirements
2 of Section A(2)(a) of the Order.

3 The foregoing modification of the Order in this matter
4 shall be effective immediately.

5 IT IS SO ORDERED June 26, 2001.

6 PAULA REDDISH ZINNEMANN
7 Real Estate Commissioner

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FILED

BEFORE THE DEPARTMENT OF REAL ESTATE DEC 27 2000
STATE OF CALIFORNIA

DEPARTMENT OF REAL ESTATE

By Laurie A. Z...

In the Matter of the Accusation of

DANIEL M. GREER,
PICKFORD REALTY, INC.,
STEPHEN CHARLES GAMES,

}

Case No. H-2581 SD

OAH No. L-2000120079

Respondent

NOTICE OF HEARING ON ACCUSATION

To the above named respondent:

You are hereby notified that a hearing will be held before the Department of Real Estate at the
Office of Administrative Hearings, 1350 Front Street, Room 6022,
San Diego, CA 92101

on February 28, 2001, March 1, 2001 & March 2, 2001, at the hour of 9:00 AM,
or as soon thereafter as the matter can be heard, upon the Accusation served upon you. If you object to the place of
hearing, you must notify the presiding administrative law judge of the Office of Administrative Hearings within ten
(10) days after this notice is served on you. Failure to notify the presiding administrative law judge within ten days
will deprive you of a change in the place of the hearing.

You may be present at the hearing. You have the right to be represented by an attorney at your own expense. You
are not entitled to the appointment of an attorney to represent you at public expense. You are entitled to represent
yourself without legal counsel. If you are not present in person nor represented by counsel at the hearing, the
Department may take disciplinary action against you based upon any express admission or other evidence including
affidavits, without any notice to you.

You may present any relevant evidence and will be given full opportunity to cross-examine all witnesses
testifying against you. You are entitled to the issuance of subpoenas to compel the attendance of witnesses and the
production of books, documents or other things by applying to the Department of Real Estate.

The hearing shall be conducted in the English language. If you want to offer the testimony of any witness who
does not proficiently speak the English language, you must provide your own interpreter and pay his or her costs. The
interpreter must be certified in accordance with Sections 11435.30 and 11435.55 of the Government Code.

DEPARTMENT OF REAL ESTATE

Dated: December 27, 2000

By David A. Peters
DAVID A. PETERS Counsel

1 DAVID A. PETERS, Counsel (SBN 99528)
2 Department of Real Estate
3 P. O. Box 187000
4 Sacramento, CA 95818-7000

FILED
OCT - 5 2000

5 Telephone: (916) 227-0789
6 -or- (916) 227-0781 (Direct)

DEPARTMENT OF REAL ESTATE
By *Laurie A. Zinn*

8 BEFORE THE DEPARTMENT OF REAL ESTATE
9 STATE OF CALIFORNIA

10 * * *

11 In the Matter of the Accusation of) No. H-2581 SD
12 DANIEL M. GREER,)
13 PICKFORD REALTY, INC.,) ACCUSATION
14 STEPHEN CHARLES GAMES)
15 Respondents.)

16 The Complainant, J. Chris Graves, a Deputy Real Estate
17 Commissioner of the State of California, for cause of accusation
18 against DANIEL M. GREER (hereinafter "Respondent GREER"),
19 PICKFORD REALTY, INC. dba Prudential California Realty Inc.
20 (hereinafter "Respondent PICKFORD"), and STEPHEN CHARLES GAMES
21 (hereinafter "Respondent GAMES"), is informed and alleges as
22 follows:

23 I

24 The Complainant, J. Chris Graves, a Deputy Real Estate
25 Commissioner of the State of California, makes this accusation in
26 his official capacity.

27 ///

1 II

2 Respondents GREER, PICKFORD, and GAMES, are licensed
3 and/or have license rights under the Real Estate Law (Part 1 of
4 Division 4 of the Business and Professions Code) (hereinafter
5 "Code") as follows:

6 DANIEL M. GREER - as a real estate salesperson.

7 PICKFORD REALTY, INC. - as a real estate broker
8 corporation acting by and through Respondent GAMES as designated
9 broker-officer.

10 STEPHEN CHARLES GAMES - as a real estate broker and as
11 designated broker-officer for Respondent PICKFORD.

12 III

13 Beginning on or about October 4, 1998, and continuing
14 through on or about June 28, 1999, Respondent GREER's real estate
15 salesperson license was expired.

16 IV

17 Beginning on or after October 4, 1998 and continuing
18 through on or before June 28, 1999, at a time when Respondent
19 GREER's real estate salesperson license had expired as described
20 in Paragraph III above, Respondent GREER while in the employ of
21 Respondent PICKFORD, engaged in the business of, acted in the
22 capacity of, advertised, or assumed to act as a real estate
23 broker and/or salesperson, selling or offering to sell, buying or
24 offering to buy, soliciting or obtaining listings of, or
25 negotiating the purchase, sale or exchange of real property for
26 or in expectation of a compensation within the meaning of
27 Sections 10131(a) and 10132 of the Code.

V

The real estate activities conducted by Respondent GREER as described in Paragraph IV above, include, but are not limited to, the following transactions:

DATE	SELLER	PROPERTY
10/08/98	Mike & Carole Lehan	12636 Caminito Radiante San Diego, California
10/13/98	Mary Ellen Robinson	4036 Jackdaw San Diego, California
10/31/98	Greg & Michelle Bennett	12566 Cavallo San Diego, California
12/18/98	Stephen & Shaun Shields	12378 Mona Lisa San Diego, California
12/22/98	Ronald & Nancy Moore	13212 Capstone San Diego, California
12/31/98	Cindy Karen	12648 Caminito Destello San Diego, California
02/03/99	Donna Doan	13405 Marcasel Place San Diego, California
02/06/99	Ed & Cinthia Wong	4689 Da Vinci San Diego, California
02/09/99	Victor & Jo Ann Schorn	13491 Glenclift San Diego, California
02/10/99	Santos & Saroj Arya	4951 Pealman Way San Diego, California
///		
///		

	<u>DATE</u>	<u>SELLER</u>	<u>PROPERTY</u>
1			
2	02/11/99	Vicki Jensen	12525 El Camino #D
3			San Diego, California
4	03/04/99	Michael & Rachel	4867 Ruete De Mer
5		Collins	San Diego, California
6	03/13/99	Karen Toborg	4733 Shadwell
7			San Diego, California
8	03/14/99	Dick & Peggy	13346 Landfair
9		Semerdjien	San Diego, California
10	03/23/99	Payling Wang	12396 Mona Lisa
11			San Diego, California
12	04/14/99	Peter & Manjulita	13275 Denara
13		Woytowitz	San Diego, California
14	04/14/99	Mr. & Mrs. Basuta	13671 Glenclyff
15			San Diego, California
16	04/16/99	Valerie Shapiro	5163 Cheltenham
17			San Diego, California
18	04/19/99	Charles & Ann	14032 Mango
19		Fleming	Del Mar, California
20	04/24/99	Lynn Nguyen &	13098 Harwick
21		Tien Cao	San Diego, California

VI

Beginning on or after October 4, 1998 and continuing through on or before June 28, 1999, in connection with the real estate activities described in Paragraphs IV and V above, Respondent PICKFORD employed or compensated, directly or indirectly Respondent GREER to perform acts requiring a real

1 estate license at a time when Respondent GREER's real estate
2 salesperson license was expired.

3 VII

4 At various times beginning on or about October 4, 1998
5 and continuing through on or before June 28, 1999, Respondent
6 GAMES, as designated broker-officer for Respondent PICKFORD,
7 failed to exercise reasonable supervision and control over the
8 licensed activities of Respondent PICKFORD required by Section
9 10159.2 of the Code in that Respondent GAMES permitted Respondent
10 GREER, a real estate salesperson with an expired real estate
11 license, to conduct the real estate sales activities described in
12 Paragraphs IV and V above. Respondent GAMES failed to exercise
13 reasonable supervision over the activities of Respondent
14 PICKFORD's salespersons by failing to establish adequate
15 policies, rules, procedures and systems to review, oversee,
16 inspect and manage said activities.

17 VIII

18 The acts and/or omissions of Respondents GREER,
19 PICKFORD and GAMES described above are grounds for the suspension
20 or revocation of the licenses and/or license rights of
21 Respondents GREER, PICKFORD and GAMES under the following
22 sections of the Code and of Title 10, California Code of
23 Regulations (hereinafter "Regulations").

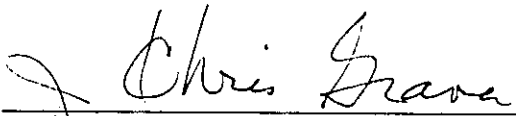
24 (1) As to Paragraphs IV and V, under Section 10177(d)
25 of the Code in conjunction with Section 10130 of the Code as to
26 Respondent GREER;

27 ///

1 (2) As to Paragraph VI, under Section 10137 of the
2 Code as to Respondent PICKFORD;

3 (3) As to Paragraph VII, under Section 10177(h) of the
4 Code and Section 10177(d) of the Code in conjunction with Section
5 2725 of the Regulations as to Respondent GAMES. In the
6 alternative, the acts and/or omissions of Respondent GAMES
7 described in Paragraph VII are grounds for the suspension or
8 revocation of Respondent GAMES' license and/or license rights
9 under Section 10177(g) of the Code.

10 WHEREFORE, Complainant prays that a hearing be
11 conducted on the allegations of this Accusation and that upon
12 proof thereof a decision be rendered imposing disciplinary action
13 against all licenses and license rights of Respondents, under the
14 Real Estate Law (Part 1 of Division 4 of the Business and
15 Professions Code) and for such other and further relief as may be
16 proper under other provisions of law.

17
18 
19 J. CHRIS GRAVES
Deputy Real Estate Commissioner

20 Dated at San Diego, California,
21 this 27th day of September, 2000.