

FILED

SEP 25 2017

BUREAU OF REAL ESTATE

By *Sybil Danner*

BEFORE THE BUREAU OF REAL ESTATE
DEPARTMENT OF CONSUMER AFFAIRS
STATE OF CALIFORNIA

In the Matter of the Accusation against

CALBRE No. H-04922 SD

QUEST REALTY & PROPERTY MANAGEMENT
SERVICES, INC.,

MARY JANE ALLEN, individually and as
former designated officer of Quest Realty & Property
Management Services, Inc.,

JEFFREY ALLEN, and

CASSAUNDR A PATTERSON,

Respondents.

DECISION

This Decision is being issued in accordance with the provisions of Section 11520 of the Government Code, on evidence of compliance with Section 11505 of the Government Code and pursuant to the Orders of Default filed on September 6, 2017. The findings of fact set forth herein are based on one or more of the following: (1) Respondents' express admissions; (2) affidavits; and/or, (3) other evidence.

Pursuant to Government Code section 11521, the Bureau of Real Estate ("Bureau") may order reconsideration of this Decision on petition of any party. The Bureau's power to order reconsideration of this Decision shall expire 30 days after mailing of this Decision, or on the effective date of this Decision, whichever occurs first. The right to reinstatement of a revoked real estate license or to the reduction of a penalty is controlled by Section 11522 of the

Government Code. A copy of Sections 11521 and 11522 and a copy of the Commissioner's Criteria of Rehabilitation are attached hereto for the information of respondent.

FINDINGS OF FACT

1.

On July 20, 2017, Veronica Kilpatrick made the Accusation in her official capacity as a Supervising Special Investigator of the State of California. The Accusation, Statement to Respondent, and Notice of Defense were mailed to Respondents' last known addresses of record by regular mail and by certified mail, return receipt requested, on July 28, 2017, August 17, 2017, August 21, 2017, and August 22, 2017.

2.

On September 6, 2017, no Notice of Defense having been filed herein within the time prescribed by Section 11506 of the Government Code, Respondents' defaults were entered herein.

3.

All references to the "Code" are to the California Business and Professions Code and all references to "Regulations" are to Title 10, Chapter 6, California Code of Regulations.

4.

Respondents are presently licensed and/or have license rights under the Real Estate Law (Part 1 of Division 4 of the California Business and Professions Code).

5.

From August 11, 2009 through the present, Respondent QUEST REALTY & PROPERTY MANAGEMENT SERVICES, INC. ("QUEST") has had license rights with the Bureau as a real estate corporation, License ID 01869486. QUEST's license expired on August 10, 2017. QUEST has renewal rights pursuant to Code Section 10201. The Bureau retains jurisdiction pursuant to Code Section 10103.

6.

From July 11, 2014 through the present, Respondent MARY JANE ALLEN ("MARY ALLEN"), aka Mary Jane Filter, Mary Jane Shaffer, Jani Allen, and Jani Tubis has been licensed by the Bureau as a real estate broker, License ID 01276845. Respondent MARY ALLEN was previously licensed as a salesperson from March 11, 2000 through July 10, 2014.

7.

From August 7, 2014 through August 10, 2017, Respondent QUEST was licensed as a real estate corporation, acting by and through Respondent MARY ALLEN as its designated broker-officer. As the broker-officer designated by QUEST pursuant to Section 10211 of the Code, MARY ALLEN was responsible for the supervision and control of the activities conducted on behalf of QUEST, by its officers and employees, as necessary to secure full compliance with Real Estate Law as set forth in Code Section 10159.2 and Regulation 2725.

8.

From December 26, 2007 through the present, Respondent JEFFREY ALLEN (“JEFF ALLEN”) has been licensed by the Bureau as a real estate salesperson, License ID 01794547. From July 19, 2010 through March 1, 2017, JEFF ALLEN was licensed under the employment of QUEST. JEFF ALLEN’s real estate salesperson license is currently restricted and in non-working status, “NBA.” JEFF ALLEN may not perform acts for which a real estate license is required while he is not under the employment of a licensed broker. JEFF ALLEN was issued a restricted salesperson license by the Bureau in Case No. H-03736 SD.

9.

From March 10, 2016 through the present, Respondent CASSAUNDR A PATTERSON (“PATTERSON”) aka Cassandra Patterson, Cassandra L. Allen, and Cassandra Lynn Henderson, has been licensed by the Bureau as a real estate salesperson, License ID 01997087. From March 10, 2016 through February 21, 2017, PATTERSON was licensed under the employment of QUEST.

10.

Attached as Exhibit “A” is a true and correct copy of the Accusation filed on July 28, 2017, which is incorporated herein as part of this Decision.

DETERMINATION OF ISSUES

1.

The conduct, acts, and/or omissions of Respondents, as described in Exhibit “A,” Paragraphs 11 through 14, constitute cause for the suspension or revocation of the real estate licenses and license rights of Respondents QUEST, MARY ALLEN AND JEFF ALLEN under the provisions of Code Sections 10165, 10177(d) and 10176(i) for violation of Code sections 10162(c)(2), 10145, and Regulations 2710(c), 2715, and 2831 through 2832.1.

2.

The conduct, acts, and/or omissions of Respondent MARY ALLEN, as described in Exhibit "A," Paragraphs 11 through 14 and 16, constitute cause for the suspension or revocation of the real estate license and license rights of Respondent MARY ALLEN pursuant to the provisions of Code Section 10177(h).

3.

The conduct, acts, and/or omissions of Respondents QUEST and MARY ALLEN, as described in Exhibit "A," Paragraphs 17 through 19, constitute cause for the suspension or revocation of the real estate license and license rights of Respondent QUEST under the provisions of Code Section 10177(d) for violation of Code section 10148.

4.

The conduct, acts, and/or omissions of Respondent MARY ALLEN, as described in Exhibit "A," Paragraphs 17 through 21, constitute cause for the suspension or revocation of the real estate license and license rights of Respondent MARY ALLEN pursuant to the provisions of Code Section 10177(h).

5.

The conduct, acts, and/or omissions of Respondents PATTERSON, QUEST, and MARY ALLEN, as described in Exhibit "A," Paragraphs 22 through 26, constitute cause for the suspension or revocation of the real estate license and license rights of Respondent PATTERSON pursuant to the provisions of Code Sections 10177(a) and 498 and Regulations 2710(c) and 2715.5.

6.

The conduct, acts, and/or omissions of Respondent MARY ALLEN, as described in Exhibit "A," Paragraphs 22 through 26, constitute cause for the suspension or revocation of the real estate license and license rights of Respondent MARY ALLEN pursuant to the provisions of Code Sections 499 and 10177(d).

7.

The standard of proof applied was clear and convincing proof to a reasonable certainty.

8.

The Bureau incurred investigation costs of \$11,375.30 related to this matter.

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ORDER

The license and license rights of Respondents QUEST REALTY & PROPERTY MANAGEMENT SERVICES, INC., MARY JANE ALLEN, JEFFREY ALLEN, and CASSAUNDR A PATTERSON under the provisions of Part I of Division 4 of the Business and Professions Code are revoked.

This Decision shall become effective at 12 o'clock noon on OCT 16 2017.

DATED: September 15, 2017.

WAYNE S. BELL
REAL ESTATE COMMISSIONER

By: Daniel J. Sandri
DANIEL J. SANDRI
Chief Deputy Commissioner

1 Bureau of Real Estate
2 320 West Fourth St, Ste 350
3 Los Angeles, CA, 90013

4 (213) 576-6914

FILED

SEP 06 2017

BUREAU OF REAL ESTATE

By *Sybil Danna*

7 BEFORE THE BUREAU OF REAL ESTATE

8 DEPARTMENT OF CONSUMER AFFAIRS

9 STATE OF CALIFORNIA

11 * * *

12 In the Matter of the Accusation against) CalBRE NO. *H-04922 SD*
13)
14 QUEST REALTY & PROPERTY)
15 MANAGEMENT SERVICES INC,) DEFAULT ORDER
16 Respondent.)

17 Respondent QUEST REALTY & PROPERTY MANAGEMENT
18 SERVICES INC, having failed to file a Notice of Defense within the time required by
19 Section 11506 of the Government Code, is now in default. It is, therefore, ordered that a
20 default be entered on the record in this matter.

21 IT IS SO ORDERED *September 5, 2017*

22 WAYNE S BELL
23 REAL ESTATE COMMISSIONER

24
25 By: *Dolores Ramos*
26 DOLORES RAMOS
27 Regional Manager

1 Bureau of Real Estate
2 320 West Fourth St, Ste 350
3 Los Angeles, CA, 90013

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BUREAU OF REAL ESTATE

By *Sigurd Narves*

7 BEFORE THE BUREAU OF REAL ESTATE

8 DEPARTMENT OF CONSUMER AFFAIRS

9 STATE OF CALIFORNIA

10 * * *

11
12 In the Matter of the Accusation against) CalBRE NO. *H-04922 SD*
13 MARY JANE ALLEN,) DEFAULT ORDER
14 Respondent.)
15

16
17 Respondent MARY JANE ALLEN, having failed to file a Notice of Defense
18 within the time required by Section 11506 of the Government Code, is now in default. It is,
19 therefore, ordered that a default be entered on the record in this matter.

20 IT IS SO ORDERED *September 5, 2017*

21 WAYNE S BELL
22 REAL ESTATE COMMISSIONER

23 By: *Dolores Ramos*
24 DOLORES RAMOS
25 Regional Manager
26
27

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BUREAU OF REAL ESTATE

By *Shyrdanna*

7 BEFORE THE BUREAU OF REAL ESTATE
8 DEPARTMENT OF CONSUMER AFFAIRS
9 STATE OF CALIFORNIA
10

11 * * *

12 In the Matter of the Accusation against)	CalBRE NO. <i>H-04922 SD</i>
)	
13 JEFFREY ALLEN,)	<u>DEFAULT ORDER</u>
)	
14 Respondent.)	
)	

16 Respondent JEFFREY ALLEN, having failed to file a Notice of Defense
17 within the time required by Section 11506 of the Government Code, is now in default. It is,
18 therefore, ordered that a default be entered on the record in this matter.

19 IT IS SO ORDERED *September 5, 2017*

20 WAYNE S BELL
21 REAL ESTATE COMMISSIONER

22
23 By: *Dolores Ramos*
24 DOLORES RAMOS
25 Regional Manager
26
27

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BUREAU OF REAL ESTATE

By *Hyrid Ranner*

7 BEFORE THE BUREAU OF REAL ESTATE

8 DEPARTMENT OF CONSUMER AFFAIRS

9 STATE OF CALIFORNIA

10 * * *

11
12 In the Matter of the Accusation against) CalBRE NO. ***H-04922 SD***
13 CASSAUNDR A PATTERSON,) DEFAULT ORDER
14 Respondent.)
15)

16 Respondent CASSAUNDR A PATTERSON, having failed to file a Notice of
17 Defense within the time required by Section 11506 of the Government Code, is now in
18 default. It is, therefore, ordered that a default be entered on the record in this matter.

19 IT IS SO ORDERED *September 5, 2017*

20 WAYNE S BELL
21 REAL ESTATE COMMISSIONER

22
23 By: *Dolores Ramos*
24 DOLORES RAMOS
25 Regional Manager
26
27