

1 DEPARTMENT OF REAL ESTATE
2 P. O. Box 187000
3 Sacramento, CA 95818-7000
4 Telephone: (916) 227-0789
5
6
7

FILED
OCT 10 1997

DEPARTMENT OF REAL ESTATE
By Shelly Coy

8 BEFORE THE DEPARTMENT OF REAL ESTATE
9 STATE OF CALIFORNIA

10 * * *

11 In the Matter of the Accusation of) No. H-7481 SF
12 LEV PIROGOVSKY,) STIPULATION AND AGREEMENT
13 Respondent.)
14 _____)

15 It is hereby stipulated by and between LEV PIROGOVSKY
16 (Respondent), and the Complainant, acting by and through Deidre
17 L. Johnson, Counsel for the Department of Real Estate, as
18 follows for the purpose of settling and disposing the Amended
19 Accusation filed on August 7, 1997, in this matter:

20 1. All issues which were to be contested and all
21 evidence which was to be presented by Complainant and Respondent
22 at a formal hearing on the Amended Accusation, which hearing was
23 to be held in accordance with the provisions of the Administrative
24 Procedures Act (APA), shall instead and in place thereof be
25 submitted solely on the basis of the provisions of this
26 Stipulation and Agreement.
27

1 2. Respondent has received, read and understands
2 the Statement to Respondent, and the Discovery Provisions
3 of the APA filed by the Department of Real Estate in this
4 proceeding.

5 3. On July 21, 1997, Respondent filed his Notice of
6 Defense pursuant to Section 11505 of the Government Code for the
7 purpose of requesting a hearing on the allegations in the Amended
8 Accusation. Respondent hereby freely and voluntarily withdraws
9 said Notice of Defense. Respondent acknowledges that he
10 understands that by withdrawing said Notice of Defense he will
11 thereby waive his right to require the Commissioner to prove the
12 allegations in the Amended Accusation at a contested hearing held
13 in accordance with the provisions of the APA, and that he will
14 waive other rights afforded to him in connection with the hearing
15 such as the right to present evidence in defense of the
16 allegations in the Amended Accusation and the right to cross-
17 examine witnesses.

18 4. Respondent, pursuant to the limitations set forth
19 below, hereby admits that the factual allegations in the Amended
20 Accusation filed in this proceeding are true and correct and the
21 Real Estate Commissioner shall not be required to provide further
22 evidence of such allegations. A true copy of the Amended
23 Accusation is attached hereto as Annex A and incorporated herein
24 by reference.

25 5. No additional documentary, testimonial, or other
26 evidence, except that which is necessary to establish
27 Complainant's jurisdiction, shall be required to be presented by



1 Complainant at any hearing in this proceeding in order to prove
2 the Amended Accusation as above stipulated.

3 6. Respondent has received, read and understands the
4 "Notice Concerning Costs of Subsequent Audits." Respondent
5 understands that by agreeing to this Stipulation and Agreement,
6 the findings set forth below in the Determination of Issues become
7 final, and that the Commissioner may charge Respondent for the
8 costs of any audit conducted pursuant to Section 10148 of the
9 Business and Professions Code. The maximum costs of said audit
10 will not exceed \$4,686.00.

11 7. It is understood by the parties that the Real Estate
12 Commissioner may adopt the Stipulation and Agreement as his
13 decision in this matter thereby imposing the penalty and sanctions
14 on Respondent's real estate license and license rights as set
15 forth in the below "Order." In the event that the Commissioner in
16 his discretion does not adopt the Stipulation and Agreement, it
17 shall be void and of no effect, and Respondent shall retain the
18 right to a hearing and proceeding on the Amended Accusation under
19 all the provisions of the APA and shall not be bound by any
20 admission or waiver made herein.

21 8. The Order or any subsequent Order of the Real Estate
22 Commissioner made pursuant to this Stipulation and Agreement shall
23 not constitute an estoppel, merger or bar to any further
24 administrative or civil proceedings by the Department of Real
25 Estate with respect to any matters which were not specifically
26 alleged to be causes for accusation in this proceeding.

27



1 DETERMINATION OF ISSUES

2 By reason of the foregoing stipulations, admissions and
3 waivers and for the purpose of settlement of the pending
4 Accusation as to Respondent without a hearing, it is stipulated
5 and agreed that the following determination of issues shall be
6 made:

7 I

8 The acts and/or omissions of Respondent LEV PIROGOVSKY
9 as stipulated above violate Section 10145 of the California
10 Business and Professions Code (hereafter the Code), and Sections
11 2832, 2832.1, 2831, 2831.1, 2831.2, and 2834 of Title 10,
12 California Code of Regulations, and constitute grounds for
13 disciplinary action against the real estate license(s) and license
14 rights of Respondent under the provisions of Sections 10177(d) of
15 the Code.

16 ORDER

17 A. All real estate license(s) and license rights of
18 Respondent LEV PIROGOVSKY are hereby revoked.

19 B. A restricted real estate broker license shall be
20 issued to Respondent pursuant to Section 10156.6 of the Code if he
21 makes application therefor and pays to the Department the
22 appropriate fee for said license within ninety (90) days of the
23 effective date of the decision.

24 C. The restricted license issued to Respondent shall be
25 subject to all of the provisions of Section 10156.7 of the
26 Business and Professions Code and to the following limitations
27 imposed under authority of Section 10156.6 of said Code:



1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27

- (1) Said restricted license shall be suspended for a period of thirty (30) days from the effective date of the Decision.

- (2) If Respondent petitions the Department in writing pursuant to Section 10175.2 of the Code, said suspension shall be stayed in whole or in part upon the following conditions:
 - (a) Respondent shall pay a monetary penalty pursuant to Section 10175.2 of the Code at the rate of \$100.00 for each day of suspension for a total maximum monetary penalty of \$3,000.00.
 - (b) 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 Decision in this matter.
 - (c) No further cause for disciplinary action against the real estate license of Respondent occurs within two (2) years from the effective date of the Decision.
 - (d) If Respondent fails to pay the monetary penalty in accordance with the terms and conditions of the Decision, the Commissioner may, without a hearing, order the immediate execution of all or any part of the stayed suspension, in which event, Respondent shall not be entitled to any repayment nor credit,

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27

prorated or otherwise, for money paid to the Department under the terms of the Decision.

(e) If Respondent pays the monetary penalty and if no further cause for disciplinary action against the real estate license of Respondent occurs within two (2) years from the effective date of the Decision, the stay hereby granted in this subparagraph "2" shall become permanent. If the Real Estate Commissioner determines that further cause for disciplinary action against Respondent's license has occurred within two (2) years from the effective date of the Decision, the stay of suspension hereby granted to that Respondent, or such portion of the stay as the Real Estate Commissioner shall deem appropriate, shall be vacated.

(f) If Respondent (1) pays the monetary penalty as provided for herein, and (2) pays, within 45 days from receipt of the invoice referred to in paragraph "8" below, the Commissioner's reasonable cost for an audit, and (3) if no further cause for disciplinary action against the real estate license of Respondent occurs within two (2) years from the effective date of this Order, the stay granted pursuant to this paragraph shall become permanent.

(3) The restricted license may be suspended prior to hearing by order of the Real Estate Commissioner in

1 the event of Respondent's conviction or plea of nolo
2 contendere to a crime which bears a substantial
3 relationship to Respondent's fitness or capacity as a
4 real estate licensee.

- 5 (4) The restricted license may be suspended prior to
6 hearing by Order of the Real estate Commissioner on
7 evidence satisfactory to the Commissioner
8 that Respondent has violated provisions of
9 the California Real Estate Law, the Subdivided Lands
10 Law, Regulations of the Real Estate Commissioner or
11 conditions attaching to the restricted license.
- 12 (5) Respondent shall not be eligible to apply for the
13 issuance of an unrestricted real estate license, nor
14 the removal of any of the conditions of the restricted
15 license, until two (2) years has elapsed from the date
16 of issuance of the restricted license.
- 17 (6) Respondent shall, within nine (9) months from the
18 effective date of this decision, present evidence
19 satisfactory to the Real Estate Commissioner that he
20 has, since the most recent issuance of an original or
21 renewal real estate license, taken and successfully
22 completed the continuing education requirements of
23 Article 2.5 of Chapter 3 of the Real Estate Law for
24 renewal of a real estate license. If Respondent fails
25 to satisfy this condition, the Commissioner may order
26 the suspension of the restricted license until the
27 Respondent presents such evidence. The Commissioner



1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27

shall afford Respondent the opportunity for hearing pursuant to the Administrative Procedure Act to present such evidence.


(7) Respondent shall, within six (6) months from the effective date of this Decision, take and pass the Professional Responsibility Examination administered by the Department including the payment of the appropriate examination fee. If Respondent fails to satisfy this condition, the Commissioner may order suspension of the restricted license until Respondent passes the examination.

(8) Pursuant to Section 10148 of the Business and Professions Code, Respondent shall pay the Commissioner's reasonable cost for a subsequent audit. In calculating the amount of the Commissioner's reasonable cost, the Commissioner may use the estimated average hourly salary for all Department Audit Section personnel performing audits of real estate brokers, and shall include an allocation for travel time to and from the auditor's place of work. Respondent shall pay such cost within forty-five (45) days of receiving an invoice from the Commissioner detailing the activities performed during the audit and the amount of time spent performing those activities. The total cost shall not exceed \$4,686. The Commissioner may suspend the license issued to Respondent pending a hearing held in accordance with

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27

Section 11500, et seq., of the Government Code, if payment is not timely made as provided for therein, or as provided for in a subsequent agreement between Respondent and the Commissioner. The suspension shall remain in effect until payment is made in full or until Respondent enters into an agreement satisfactory to the Commissioner to provide for payment, or until a decision providing otherwise is adopted following a hearing held pursuant to this condition.

DATED: September 5, 1997


DEIDRE L. JOHNSON
Counsel for the Complainant

* * *

I have read the Stipulation and Agreement, understand that I have the right to consult with an attorney or have discussed it with my counsel, and its terms are understood by me and are agreeable and acceptable to me. I understand that I am waiving rights given to me by the California Administrative Procedure Act, and I willingly, intelligently and voluntarily waive those rights, including the right of requiring the Commissioner to prove the allegations in the Accusation at a hearing at which I would have the right to cross-examine witnesses against me and to present evidence in defense and mitigation of the charges.

DATED: 9/2/97


LEV PIROGOVSKY
Respondent

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27

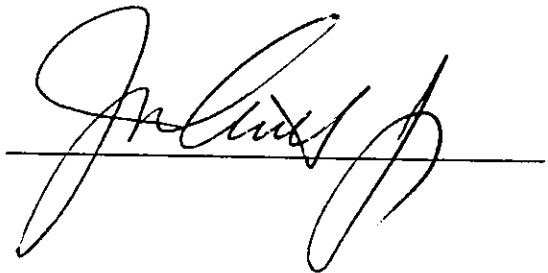
* * *

DECISION

The foregoing Stipulation and Agreement is hereby
adopted as my Decision and shall become effective at 12 o'clock
noon on October 30, 1997.

IT IS SO ORDERED 9/30, 1997.

JIM ANTT, JR.
Real Estate Commissioner



FILED
AUG 12 1997

BEFORE THE DEPARTMENT OF REAL ESTATE
STATE OF CALIFORNIA

DEPARTMENT OF REAL ESTATE

By Shelley Ely

In the Matter of the Accusation of

LEV PIROGOVSKY,

Case No. H-7481 SF

OAH No. N-1997070512

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, World Savings Tower,

1970 Broadway, Second Floor, Oakland, California 94612

on Friday, September 5, 1997, 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: August 7, 1997

By Deidre L. Johnson
DEIDRE L. JOHNSON Counsel

1 DEIDRE L. JOHNSON, Counsel
2 Department of Real Estate
3 P. O. Box 187000
4 Sacramento, California 95818-7000

5 Telephone: (916) 227-0425

FILED
AUG - 7 1997
DEPARTMENT OF REAL ESTATE

By Kathleen Contreras

7 BEFORE THE DEPARTMENT OF REAL ESTATE

8 STATE OF CALIFORNIA

9 * * *

10 In the Matter of the Accusation of)
11 LEV PIROGOVSKY,) NO. H-7481 SF
12) AMENDED ACCUSATION
13 Respondent.)

14 The Complainant, Les R. Bettencourt, a Deputy Real
15 Estate Commissioner of the State of California, for cause of
16 Amended Accusation against LEV PIROGOVSKY, is informed and alleges
17 as follows:

18 I

19 Respondent LEV PIROGOVSKY (hereafter Respondent) is
20 presently licensed and/or has license rights under the Real Estate
21 Law, Part 1 of Division 4 of the California Business, and
22 Professions Code (hereafter the Code).

23 II

24 The Complainant, Les R. Bettencourt, a Deputy Real
25 Estate Commissioner of the State of California, makes this Amended
26 Accusation against Respondent in his official capacity and not
27 otherwise.

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27

III

At times herein mentioned, Respondent was licensed by the Department of Real Estate (hereafter the Department) as a real estate broker, and, effective November 27, 1995, Respondent was and is licensed as a restricted real estate broker, individually and doing business as MONEYLINE MORTGAGE CO. and DELTA & CO. REALTY.

IV

Within the three years last past, Respondent engaged in the above businesses and acted in the capacity of a real estate broker in California within the meaning of Sections 10131(b), 10131(d) and/or 10131(e) of the Code, wherein Respondent leased or rented, offered to lease or rent, solicited prospective tenants, and/or collected rents on, and managed certain real properties in California; and wherein borrowers and lenders were solicited for loans secured directly or collaterally by liens on real property, and wherein such loans were arranged, negotiated, consummated and serviced by Respondent on behalf of others, for or in expectation of compensation.

V

Beginning in about February of 1997, the Department conducted an audit of Respondent's above businesses. During the course of the property management and loan activities described above, Respondent received and disbursed funds in trust on behalf of others, and deposited the funds into the following bank accounts at California Federal Bank in San Francisco, California:

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27

	TRUST ACCOUNT #1	TRUST ACCOUNT #2
Account No.	036-0505993-5	036-0506054-9
Account Name	Moneyline Mortgage Co. Trust Account	Lazar Veysman Delta & Co. Realty Trust Account
Signatory	Bella Veysman	Lazar Veysman

VI

In connection with the collection and disbursement of the above trust funds, Respondent failed to deposit and maintain the funds allocated to Trust Account #1 in the trust bank account, or in a neutral escrow depository, or to deliver them into the hands of the owners of the funds, in such a manner that as of December 31, 1996, there was a trust fund shortage in the approximate sum of \$164.

VII

In connection with the collection and disbursement of the trust funds, Respondent:

(a) Failed to deposit and maintain the funds allocated to Trust Account #1 and Trust Account #2 in a trust bank account in the name of Respondent as the trustee, or in a neutral escrow depository, or to deliver them into the hands of the owners of the funds;

(b) Failed to obtain the prior written consent of the principals for the reduction of the aggregate balance of trust funds in the bank account to an amount less than the existing aggregate trust fund liability to the owners of said funds;

1 (c) Failed to maintain a complete control record of all
2 trust funds received and disbursed for each account containing all
3 information required by Section 2831 of Title 10, California Code
4 of Regulations (hereafter the Regulations);

5 (d) Failed to maintain a complete separate record
6 for each beneficiary or transaction for each account
7 containing all information required by Section 2831.1 of the
8 Regulations;

9 (e) Failed to reconcile and maintain a record of
10 reconciliation of the above separate records with the control
11 record of all trust funds received for each account at least once
12 a month as required by Section 2831.2 of the Regulations;

13 (f) Authorized or permitted withdrawals to be made from
14 each of the above trust accounts by the signatories alleged in
15 Paragraph V above, without Respondent's specific written
16 authorization as required by Section 2834 of the Regulations.

17 VIII

18 The acts and/or omissions of Respondent PIROGOVSKY as
19 alleged above constitute grounds for disciplinary action under the
20 following provisions:

21 (a) As to Paragraphs V and VII(a), under Section 10145
22 of the Code and Section 2832 of the Regulations, in conjunction
23 with Section 10177(d) of the Code;

24 (b) As to Paragraph VI, under Section 10145(a) of the
25 Code in conjunction with Section 10177(d) of the Code;

26 (c) As to Paragraph VII(b), under Section 2832.1 of the
27 Regulations, in conjunction with Section 10177(d) of the Code;



1 (d) As to Paragraph VII(c), under Section 2831 of the
2 Regulations, in conjunction with Section 10177(d) of the Code;

3 (e) As to Paragraph VII(d), under Section 2831.1 of the
4 Regulations, in conjunction with Section 10177(d) of the Code;

5 (f) As to Paragraph VII(e), under Section 2831.2 of the
6 Regulations, in conjunction with Section 10177(d) of the Code;


7 (g) As to Paragraph VII(f), under Section 2834 of the
8 Regulations, in conjunction with Section 10177(d) of the Code.

9 IX

10 PRIOR DISCIPLINARY ACTION

11 Effective November 27, 1995, in Case No. H-7247 SF, the
12 Real Estate Commissioner revoked the real estate broker license of
13 Respondent and granted the right to a restricted broker license
14 for violation of Sections 10137 and 10240 of the Code in
15 conjunction with Section 10177(d) of the Code.

16 WHEREFORE, Complainant prays that a hearing be conducted
17 on the allegations of this Amended Accusation and that upon proof
18 thereof a decision be rendered imposing disciplinary action
19 against all licenses and license rights of Respondent, under the
20 Real Estate Law (Part 1 of Division 4 of the Business and
21 Professions Code) and for such other and further relief as may be
22 proper under other provisions of law.

23 
24 Les R. Bettencourt
25 Deputy Real Estate Commissioner

26 Dated at San Francisco, California,
27 this 5th day of August, 1997.



1 DEIDRE L. JOHNSON, Counsel
2 Department of Real Estate
3 P. O. Box 187000
4 Sacramento, California 95818-7000

5 Telephone: (916) 227-0425

FILED
JUL 16 1997
DEPARTMENT OF REAL ESTATE

By *Kathleen Contreras*

8 BEFORE THE
9 DEPARTMENT OF REAL ESTATE
10 STATE OF CALIFORNIA

11 * * *

12 In the Matter of the Accusation of)
13) NO. H-7481 SF
14 LEV PIROGOVSKY,) ACCUSATION
15 Respondent.)

16 The Complainant, Les R. Bettencourt, a Deputy Real
17 Estate Commissioner of the State of California, for cause of
18 Accusation against LEV PIROGOVSKY, is informed and alleges as
19 follows:

20 I

21 Respondent LEV PIROGOVSKY (hereafter Respondent) is
22 presently licensed and/or has license rights under the Real Estate
23 Law, Part 1 of Division 4 of the California Business and
24 Professions Code (hereafter the Code).

25 II

26 The Complainant, Les R. Bettencourt, a Deputy Real
27 Estate Commissioner of the State of California, makes this

1 Accusation against Respondent in his official capacity and not
2 otherwise.

3 III

4 At all times herein mentioned, Respondent was and is
5 licensed by the Department of Real Estate (hereafter the
6 Department) as a real estate broker, individually and doing
7 business as MONEYLINE MORTGAGE CO. and DELTA & CO. REALTY.

8 IV

9 Within the three years last past, Respondent engaged in
10 the above businesses and acted in the capacity of a real estate
11 broker in California within the meaning of Sections 10131(b),
12 10131(d) and/or 10131(e) of the Code, wherein Respondent leased or
13 rented, offered to lease or rent, solicited prospective tenants,
14 and/or collected rents on, and managed certain real properties in
15 California; and wherein borrowers and lenders were solicited for
16 loans secured directly or collaterally by liens on real property,
17 and wherein such loans were arranged, negotiated, consummated and
18 serviced by Respondent on behalf of others, for or in expectation
19 of compensation.

20 V

21 Beginning in about February of 1997, the Department
22 conducted an audit of Respondent's above businesses. During the
23 course of the property management and loan activities described
24 above, Respondent received and disbursed funds in trust on behalf
25 of others, and deposited the funds into the following bank
26 accounts at California Federal Bank in San Francisco, California:

27 ///

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27

	TRUST ACCOUNT #1	TRUST ACCOUNT #2
Account No.	036-0505993-5	036-0506054-9
Account Name	Moneyline Mortgage Co. Trust Account	Lazar Veysman Delta & Co. Realty Trust Account
Signatory	Bella Veysman	Lazar Veysman

VI

In connection with the collection and disbursement of the above trust funds, Respondent failed to deposit and maintain the funds allocated to Trust Account #1 in the trust bank account, or in a neutral escrow depository, or to deliver them into the hands of the owners of the funds, in such a manner that as of December 31, 1996, there was a trust fund shortage in the approximate sum of \$164.

VII

In connection with the collection and disbursement of the trust funds, Respondent:

(a) Failed to deposit and maintain the funds allocated to Trust Account #1 and Trust Account #2 in a trust bank account in the name of Respondent as the trustee, or in a neutral escrow depository, or to deliver them into the hands of the owners of the funds;

(b) Failed to obtain the prior written consent of the principals for the reduction of the aggregate balance of trust



1 funds in the bank account to an amount less than the existing
2 aggregate trust fund liability to the owners of said funds;

3 (c) Failed to maintain a complete control record of all
4 trust funds received and disbursed for each account containing all
5 information required by Section 2831 of Title 10, California Code
6 of Regulations (hereafter the Regulations);

7 (d) Failed to maintain a complete separate record for
8 each beneficiary or transaction for each account containing all
9 information required by Section 2831.1 of the Regulations;

10 (e) Failed to reconcile and maintain a record of
11 reconciliation of the above separate records with the control
12 record of all trust funds received for each account at least once
13 a month as required by Section 2831.2 of the Regulations;

14 (f) Authorized or permitted withdrawals to be made from
15 each of the above trust accounts by the signatories alleged in
16 Paragraph V above, without Respondent's specific written
17 authorization as required by Section 2834 of the Regulations.

18 VIII

19 The acts and/or omissions of Respondent PIROGOVSKY as
20 alleged above constitute grounds for disciplinary action under the
21 following provisions:

22 (a) As to Paragraphs V and VII(a), under Section 10145
23 of the Code and Section 2832 of the Regulations, in conjunction
24 with Section 10177(d) of the Code;

25 (b) As to Paragraph VI, under Section 10145(a) of the
26 Code in conjunction with Section 10177(d) of the Code;

27 ///



1 (c) As to Paragraph VII(b), under Section 2832.1 of the
2 Regulations, in conjunction with Section 10177(d) of the Code;


3 (d) As to Paragraph VII(c), under Section 2831 of the
4 Regulations, in conjunction with Section 10177(d) of the Code;

5 (e) As to Paragraph VII(d), under Section 2831.1 of the
6 Regulations, in conjunction with Section 10177(d) of the Code;

7 (f) As to Paragraph VII(e), under Section 2831.2 of the
8 Regulations, in conjunction with Section 10177(d) of the Code;

9 (g) As to Paragraph VII(f), under Section 2834 of the
10 Regulations, in conjunction with Section 10177(d) of the Code.

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

19 
20 LES R. BETTENCOURT
21 Deputy Real Estate Commissioner

22 Dated at San Francisco, California,
23 this 15th day of July, 1997.

24
25
26
27

