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ź	MARY E. WORK, Counsel
	Department of Real Estate
	320 W. 4th Street, Suite 350 3. Los Angeles, CA 90013-1105
	Telephone: (213) 576-6982 (213) 576-6916 (Diment) DEPARTMENT OF REAL ESTATE
	(213) 576-6916 (Direct)
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:	BEFORE THE DEPARTMENT OF REAL ESTATE
10	STATE OF CALIFORNIA
11	* * *
12	
13	MONEY PLUS FINANCIAL, Inc.,) NO. H-28770 LA dba 1" Family Realty and)
14	
15	Respondents.
16	It is hereby stipulated by and between CATALINA SERRANO
. 17	(hereinafter referred to as "Respondent") and the Complainant,
18	acting by and through Mary E. Work, Counsel for the Department of
19	Real Estate, as follows for the purpose of settling and disposing
20	of the Accusation filed on September 22, 2000 in this matter.
21	1. All issues which were to be contested and all
22 23	evidence which was to be presented by Complainant and Respondent
23	at a formal hearing on the Accusation, which hearing was to be
25	held in accordance with the provisions of the Administrative
26	Procedure Act (APA), shall instead and in place thereof be
- 27	submitted solely on the basis of the provisions of this
æ	Stipulation and Agreement.
COURT PAPER STATE OF CALIFORNIA STD. 113 (REV. 3-93)	
OSP 98 10924	1
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Respondent has received, read and understands the 2. Statement to Respondent, the Discovery Provisions of the APA and the Accusation filed by the Department of Real Estate in this proceeding.

On October 16, 2000, Respondent filed a Notice of 3. 6 Defense pursuant to Section 11506 of the Government Code for the 7 purpose of requesting a hearing on the allegations in the 8 Accusation. Respondent hereby freely and voluntarily withdraws 9 said Notice of Defense. Respondent acknowledges that she 10 understands that by withdrawing said Notice of Defense she will 11 thereby waive her right to require the Commissioner to prove the 12 allegations in the Accusation at a contested hearing held in 13 accordance with the provisions of the APA and that she will waive 14 other rights afforded to her in connection with the hearing such-15 as the right to present evidence in defense of the allegations in 16 the Accusation and the right to cross-examine witnesses. 17

This Stipulation and Agreement (hereinafter 4. "Stipulation") is based on the factual allegations contained in 19 the Accusation filed in this proceeding. In the interest of 20 expedience and economy, Respondent chooses not to contest these factual allegations, but to remain silent and understands that, as a result thereof, these factual statements, without being admitted or denied, will serve as a prima facie basis for the disciplinary action stipulated to herein. This Stipulation and Respondent's decision not to contest the Accusation are hereby expressly limited to this proceeding and made for the sole purpose of reaching an agreed disposition of this proceeding.

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Respondent's decision not to contest the factual allegations is made solely for the purpose of effectuating this Stipulation and is intended by Respondent to be non-binding upon any actions against Respondent by third parties. The Real Estate Commissioner shall not be required to provide further evidence to prove such allegations.

This Stipulation and any Order made pursuant to the 5. 7 Stipulation shall have no collateral estoppel or res judicata 8 effect in any proceedings in which Respondent and the Department. 9 (or the Department's representative) are not parties. 10. The Stipulation is made by Respondent and received by the 11: Commissioner and the Department, with the express understanding 12 and agreement that it is for the purpose of settling these 13 proceedings only, and that this Stipulation is not intended as, 14 and shall not be deemed, used, or accepted as an acknowledgment 15 or admission of fact in any other judicial, administrative, or 16 other proceeding to which the Department is not a party. 17

It is understood by the parties that the Real б. 18 Estate Commissioner may adopt the Stipulation and Agreement as 19 her Decision in this matter, thereby imposing the penalty and 20 sanctions on Respondent's real estate license and license rights 21 as set forth in the below "Order". In the event that the 22 Commissioner in her discretion does not adopt the Stipulation and 23 Agreement, it shall be void and of no effect, and Respondent 24 shall retain the right to a hearing and proceeding on the 25 Accusation under all the provisions of the APA and shall not be 26 bound by any admission or waiver made herein. 27

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7. The Order or any subsequent Order of the Real

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

DETERMINATION OF ISSUES

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

The conduct, acts and/or omissions of Respondent, CATALINA SERRANO, as set forth in the Accusation violate Business and Professions Code (hereinafter "Code") Section <u>10130</u> of the Code and constitute cause to suspend or revoke the real estate license and license rights of Respondent CATALINA SERRANO, under the provisions of Section 10177(d) of the Code.

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ORDER

19	WHEREFORE, THE FOLLOWING ORDER is made:
20	All licenses and licensing rights of Respondent
21	CATALINA SERRANO, under the Real Estate Law, are revoked;
22	provided, however, a restricted real estate license shall be
23	issued to Respondent pursuant to Section 10156.5 of the Code if
24	Respondent makes application therefor and pays to the Department
25	of Real Estate the appropriate fee for the restricted license
26	within 90 days from the effective date of this Decision. The
27	restricted license issued to Respondent shall be subject to all
	of the provisions of Section 10156.7 of the Code and to the

COURT PAPER STATE OF CALIFORNIA STD. 113 (REV. 3-95) OSP 98 10924 following limitations, conditions and restrictions imposed under authority of Section 10156.6 of the Code:

The restricted license issued to Respondent shall
 be suspended for forty (40) days from the effective date of
 issuance of a restricted license; provided, however, that if
 Respondent petitions, said forty (40) day suspension (or a
 portion thereof) shall be stayed for two (2) years upon condition
 that:

9 a. Respondent pays a monetary penalty pursuant to
10 Section 10175.2 of the Business and Professions Code at the rate
11 of \$50.00 for each day of the suspension, for a total monetary
12 penalty of \$2,000.00.

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 received by the
Department prior to the effective date of the Decision in this
matter.

18 c. No further cause for disciplinary action against
 19 the real estate license of Respondent occurs within two (2) years
 20 from the effective date of the Decision in this matter.

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 the Respondent shall not be entitled to any repayment nor
credit, prorated or otherwise, for any money paid to the
Department under the terms of this Decision.

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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 shall become permanent.

6 2. The restricted license issued to Respondent may be
7 suspended prior to hearing by Order of the Real Estate
8 Commissioner in the event of Respondent's conviction or plea of
9 nolo contendere to a crime which is substantially related to
10 Respondent's fitness or capacity as a real estate licensee.

11 3. The restricted license issued to Respondent may be 12 suspended prior to hearing by Order of the Real Estate 13 Commissioner on evidence satisfactory to the Commissioner that 14 Respondent has violated provisions of the California Real Estate 15 Law, the Subdivided Lands Law, Regulations of the Commissioner or 16 conditions attaching to the restricted license.

17 <u>4. Respondent shall not be eligible to apply for the</u>
18 issuance of an unrestricted real estate license nor for the
19 removal of any of the conditions, limitations or restrictions of
20 a restricted license until (2) years have elapsed from the
21 effective date of this Decision.

22 <u>5. Respondent shall submit with any application for</u>
23 license under an employing broker, or any application for
24 transfer to a new employing broker, a statement signed by the
25 prospective employing real estate broker on a form approved by
26 the Department of Real Estate which shall certify:

(a) That the employing broker has read the Decision of the Commissioner which granted the right to a restricted

COURT PAPER STATE OF CALIFORNIA STD. 113 (REV. 3-95) OSP 98 10924

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license; and

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(b) That the employing broker will exercise close supervision over the performance by the restricted licensee relating to activities for which a real estate license is required.

Respondent's original real estate salesperson 5. 6 license was issued subject to the provisions of Section 10153.4 7 of the Business and Professions Code, and the restricted real 8 estate license issued to Respondent shall be similarly limited, 9 to wit: Respondent shall, by December 7, 2001, submit evidence 10 satisfactory to the Commissioner of successful completion, at an 11 accredited institution, of two of the courses listed in Section 12 10153.2, other than real estate principals, advanced legal 13 aspects of real estate, advanced real estate finance, or advanced 14 real estate appraisal. If Respondent fails to present 15 satisfactory evidence of successful completion of said courses, 16 the restricted license shall be automatically suspended effective 17 December 7, 2001. Said suspension shall not be lifted until 18 Respondent has submitted the required evidence of course 19 completion and the Commissioner had given written notice to the 20 Respondent of lifting the suspension. 21

DATED: 12-29-00

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I have read the Stipulation and Agreement, 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

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MARY E. WORK, Counsel for the Department of Real Estate

COURT PAPER STATE OF CALIFORNIA STD. 113 (REV. 3-95) OSP 98 10924

California Administrative Procedure Act (including but not 1 limited to Sections 11506, 11508, 11509 and 11513 of the 2 Government Code), and I willingly, intelligently and voluntarily 3 waive those rights, including the right of requiring the 4 Commissioner to prove the allegations in the Accusation at a 5 hearing at which I would have the right to cross-examine 6 witnesses against me and to present evidence in defense and 7 mitigation of the charges. 8

Respondent can signify acceptance and approval of the 9 terms and conditions of this Stipulation and Agreement by faxing 10 a copy of the signature page, as actually signed by Respondent, 11 to the Department at the following telephone/fax number: (213) 12 576-6917. Respondent agrees, acknowledges and understands that by 13 electronically sending to the Department a fax copy of his or her 14 actual signature as it appears on the Stipulation and Agreement, 15 that receipt of the faxed copy by the Department shall be as 16 binding on Respondent as if the Department had received the 17 original signed Stipulation and Agreement. 18

DATED: 12/26/02

CATALIN RANO, Respondent

26 27 STD. 113 (REV. 3-95)

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The foregoing Stipulation and Agreement is hereby adopted as my Decision as to Respondent CATALINA SERRANO and shall become effective at 12 o'clock noon on February 26, 2001 IT IS SO ORDERED a Huu PAULA REDDISH ZINNEMAN Real/Estate Commissioner (UU ÚČ COURT PAPER STD. 113 (REV. 3-95) OSP 98 10924

SMAC	MARY E. WORK, Counsel
1	SBN 175887
2	Department of Real Estate 320 W. 4 th Street, Suite 350 DEC 13 2000
3	Los Angeles, CA 90013-1105 DEPARTMENT OF REAL ESTATE
4	Telephone: (213) 576-6982 (213) 576-6916 (Direct) By
5	
6	
7	
8	BEFORE THE DEPARTMENT OF REAL ESTATE
9	STATE OF CALIFORNIA
10	* * *
11	In the Matter of the Accusation of)
12) NO. H-28770 LA MONEY PLUS FINANCIAL, Inc.,)
13	dba 1 st Family Realty;) STIPULATION AND AGREEMENT and CATALINA SERRANO,)
14	an individual,
15	Respondents.
16	It is hereby stipulated by and between MONEY PLUS
17	
18	FINANCIAL, Inc., dba 1 st Family Realty (hereinafter referred to as
19	"Respondent") and the Complainant, acting by and through Mary E.
20	Work, Counsel for the Department of Real Estate, as follows for
21	the purpose of settling and disposing of the Accusation filed on
22	September 22, 2000 in this matter:
23	1. All issues which were to be contested and all
24	evidence which was to be presented by Complainant and Respondent
25	at a formal hearing on the Accusation, which hearing was to be
	held in accordance with the provisions of the Administrative
26	Procedure Act (APA), shall instead and in place thereof be
27	submitted solely on the basis of the provisions of this
COURT PAPER STATE OF CALIFORNIA	Stipulation and Agreement.
STD. 113 (REV. 3-95) OSP 98 10924	1

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

6 3. On October 2, 2000, Respondent filed a Notice of 7 Defense pursuant to Section 11506 of the Government Code for the 8 purpose of requesting a hearing on the allegations in the 9 Respondent hereby freely and voluntarily withdraws Accusation. 10 said Notice of Defense. Respondent acknowledges that it 11 understands that by withdrawing said Notice of Defense it will 12 thereby waive its right to require the Commissioner to prove the 13 allegations in the Accusation at a contested hearing held in 14 accordance with the provisions of the APA and that it will waive 15 other rights afforded to it in connection with the hearing such 16 as the right to present evidence in defense of the allegations in 17 the Accusation and the right to cross-examine witnesses.

4. This Stipulation and Agreement (hereinafter "Stipulation") is based on the factual allegations contained in the Accusation filed in this proceeding. In the interest of expedience and economy, Respondent chooses not to contest these factual allegations, but to remain silent and understands that, as a result thereof, these factual statements, without being admitted or denied, will serve as a prima facie basis for the disciplinary action stipulated to herein. This Stipulation and Respondent's decision not to contest the Accusation are hereby

COURT PAPER STATE OF CALIFORNIA STD. 113 (REV. 3-95) OSP 98 10924

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expressly limited to this proceeding and made for the sole purpose of reaching an agreed disposition of this proceeding. Respondent's decision not to contest the factual allegations is made solely for the purpose of effectuating this Stipulation and is intended by Respondent to be non-binding upon any actions against Respondent by third parties. The Real Estate Commissioner shall not be required to provide further evidence to prove such allegations.

This Stipulation and any Order made pursuant to the 5. 9 Stipulation shall have no collateral estoppel or res judicata effect in any proceedings in which Respondent and the Department 11 (or the Department's representative) are not parties. The Stipulation is made by Respondent and received by the Commissioner and the Department, with the express understanding and agreement that it is for the purpose of settling these 15 proceedings only, and that this Stipulation is not intended as, and shall not be deemed, used, or accepted as an acknowledgment or admission of fact in any other judicial, administrative, or other proceeding to which the Department is not a party.

6. It is understood by the parties that the Real Estate Commissioner may adopt the Stipulation and Agreement as her Decision in this matter, thereby imposing the penalty and sanctions on Respondent's real estate license and license rights as set forth in the below "Order". In the event that the Commissioner in her discretion does not adopt the Stipulation and Agreement, it shall be void and of no effect, and Respondent shall retain the right to a hearing and proceeding on the Accusation under all the provisions of the APA and shall not be

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bound by any admission or waiver made herein.

The Order or any subsequent Order of the Real 7. Estate Commissioner made pursuant to this Stipulation and 3 Agreement shall not constitute an estoppel, merger or bar to any further administrative or civil proceedings by the Department of 5 Real Estate with respect to any matters which were not 6 specifically alleged to be causes for accusation in this 7 proceeding.

DETERMINATION OF ISSUES

By reason of the foregoing stipulations, admissions and 10 waivers and solely for the purpose of settlement of the pending 11 Accusation without a hearing, it is stipulated and agreed that 12 the following determination of issues shall be made: 13

The conduct, acts and/or omissions of Respondent, MONEY 14 PLUS FINANCIAL, Inc., dba 1st Family Realty, as set forth in the 15 Accusation, constitute cause to suspend or revoke the real estate 16 license and license rights of Respondent MONEY PLUS FINANCIAL, 17 Inc., dba 1st Family Realty, under the provisions of the Business 18 and Professions Code (hereinafter "Code") Section 10137. 19

<u>ORDER</u>

WHEREFORE, THE FOLLOWING ORDER is made:

All licenses and licensing rights of Respondent MONEY PLUS FINANCIAL, Inc., dba 1" Family Realty, under the Real Estate Law, are suspended for a period of thirty (30) days from the effective date of the Decision; provided, 'however, that period of suspension shall be stayed for one (1) year upon the following terms and conditions:

> Respondent shall obey all laws, rules and 1.

> > 4

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regulations governing the rights, duties and responsibilities of a real estate licensee in the State of California.

Respondent pays a monetary penalty pursuant to 2. 3 Section 10175.2 of the Business and Professions Code at the rate 4 of \$50.00 for each day of the suspension for a total monetary 5 penalty of \$1,500. 6

Said payment shall be in the form of a cashier's 3. 7 check or certified check made payable to the Recovery Account of 8 the Real Estate Fund. Said check must be received by the 9 Department prior to the effective date of the Decision in this 10 matter. 11

No further cause for disciplinary action against 4. 12 the real estate license of Respondent occurs within one (1) year 13 from the effective date of the Decision in this matter. 14

If respondent fails to pay the monetary penalty in 5. 15 accordance with the terms and conditions of the Decision, the 16 Commissioner may, without a hearing, order the immediate 17 execution of all or part of the stayed suspension in which event 18 Respondent shall not be entitled to any repayment nor credit, 19 prorated or otherwise, for money paid to the Department under 20 terms of this Decision. 21

6. If Respondent pays the monetary penalty and if no further cause for disciplinary action against the real estate 23 license of Respondent occurs within one (1) year from the effective date of the Decision, the stay hereby granted shall become permanent.

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11-3-00 DATED:

MARY E. WORK Counsel for the Department of Real Estate

I have read the Stipulation and Agreement, and its 2 terms are understood by me and are agreeable and acceptable to 3 I understand that I am waiving rights given to me by the 4 me. 5 California Administrative Procedure Act (including but not 6 limited to Sections 11506, 11508, 11509 and 11513 of the 7 Government Code), and I willingly, intelligently and voluntarily waive those rights, including the right of requiring the 8 9 Commissioner to prove the allegations in the Accusation at a 10 hearing at which I would have the right to cross-examine 11 witnesses against me and to present evidence in defense and 12 mitigation of the charges.

13 Respondent can signify acceptance and approval of the 14 terms and conditions of this Stipulation and Agreement by faxing 15 a copy of the signature page, as actually signed by Respondent, 16 to the Department at the following telephone/fax number: (213) 17 576-6917. Respondent agrees, acknowledges and understands that by 18 electronically sending to the Department a fax copy of his or her 19 actual signature as it appears on the Stipulation and Agreement, 20 that receipt of the faxed copy by the Department shall be as 21 binding on Respondent as if the Department had received the 22 original signed Stipulation and Agreement.

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DATED: $11 \cdot 1 \cdot OO$

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MONEY PLUS FINANCIAL, Inc., dba 1st Family Realty, Respondent

The foregoing Stipulation and Agreement is hereby

adopted as my Decision as to Respondent MONEY PLUS FINANCIAL, .Inc., dba 1st Family Realty and shall become effective at 12 o'clock noon on January 2, 2001) <u>EREM DER 7, 2000</u> IT IS SO ORDERED PAULA REDDISH ZINNEMANN Real Estate Lommissioner COURT PAPER STATE OF CALIFORNIA STD. 113 (REV. 3-95) OSP 98 10924

BEFORE THE DEPARTMENT OF REAL ESTATE

STATE OF CALIFORNIA

In the Matter of the Accusation of)

SAULO

MONEY PLUS FINANCIAL, INC. dba 1" Family Realty; and <u>CATALINA SERRANO</u>, an individual, Case No. <u>H-28770 LA</u>

OAH No. L-2000110183



Respondents.

NOTICE OF HEARING ON ACCUSATION By

To the above-named Respondent(s):

You are hereby notified that a hearing will be held before the Department of Real Estate at the Office of Administrative Hearings, 320 West Fourth Street, Suite 630, Los Angeles, CA 90013-1105 on <u>FRIDAY, JANUARY 12, 2001</u>, at the hour of <u>1:30 P.M.</u>, 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 subpenas 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

By WORK, MARY E. Counsel

Dated: November 16, 2000

cc: Catalina Serrano VSacto. OAH AK

RE 501 (Rev. 8/97)

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- 401 ° 1	MARY E. WORK, Counsel
	SBN 175887 Department of Real Estate
	320 West 4 th Street, Suite 350
4	Telephone: (213) 576-6982 DEPARTMENT OF REAL ESTATE (213) 576-6916 (Direct) DEPARTMENT OF REAL ESTATE
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9	BEFORE THE DEPARTMENT OF REAL ESTATE
10	STATE OF CALIFORNIA
11	In the Matter of the Accusation of) No. H-28770 LA
. 12	MONEY PLUS FINANCIAL, Inc.,) <u>ACCUSATION</u>
13	dba 1st Family Realty;) and CATALINA SERRANO,)
14	an individual,) Respondents.)
15)
16	The Complainant, Daniel M. Hatt, a Deputy Real Estate
17	Commissioner of the State of California, for cause of Accusation
18	against MONEY PLUS FINANCIAL, INC., doing business as 1" Family
19	Realty; and CATALINA SERRANO, is informed and alleges as
20	follows:
21	· I
22	The Complainant, Daniel M. Hatt, a Deputy Real Estate
23	Commissioner of the State of California, makes this Accusation
24	in his official capacity.
25	II
26	At all times material herein, MONEY PLUS FINANCIAL,
27	INC., doing business as 1^{**} Family Realty (hereinafter "MONEY
(€)	PLUS") was and still is licensed by the State of California
COURT PAPER STATE OF CALIFORNIA STD. 113 (REV. 3-95) OSP 98 10924	-1- · ·

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1 Department of Real Estate (hereinafter "Department") as a corporate real estate broker. MONEY PLUS is currently licensed 2 3 by and through Laura Cisneros as the officer and broker 4 responsible pursuant to the provisions of Section 10159.2(a) of 5 the Business and Professions Code for supervising and 6 controlling the activities performed by CATALINA SERRANO (hereinafter "SERRANO") requiring a real estate license by its 7 8 officers and employees, as necessary to secure full compliance 9 with the Real Estate Law (Section 10000 et seq. of the Business 10 and Professions Code, hereinafter "Code"). However, at the time 11 of the violations alleged below, DIANA LEE JANSEN (hereinafter "JANSEN") was the designated officer and broker responsible. 12 JANSEN surrendered her real estate broker's license to the 13 14 Department effective June 7, 2000 pursuant to H-28560-LA. 15 III 16 All further references to Respondent MONEY PLUS, 17 unless otherwise specified, include the parties identified in Paragraph II above and also include the officers, directors, 18 employees and real estate licensees employed or associated with 19

20 said parties, who at all times herein mentioned were engaged in 21 the furtherance of the business or operations of said parties 22 and who were acting within the course and scope of their 23 employment.

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IV

25 SERRANO is presently licensed by the Department as a
 26 real estate salesperson subject to the conditions of Section

27 EOURT PAPER STATE OF CALIFORNIA STO. 113 (REV. 3-95) DSP 98 10924

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1	10153.4 of the Code. Respondent SERRANO was originally licensed
2	by the Department as a real estate salesperson on June 7, 2000.
3	
4	FIRST CAUSE OF ACCUSATION
5	(Violation of Code Section 10137)
6	V
7	On or about April 24, 2000, Respondent SERRANO, while
8	employed by acting on behalf of Respondent MONEY PLUS, entered
9	into a real estate purchase contract as agent for Antonio
10	Cazares and Juan Jose Cazares, buyers, in a transaction
11	involving property located at 10264 Ocampo Street, Riverside,
. 12	California. Respondent SERRANO received a commission check,
13	dated June 16, 2000, from Respondent MONEY PLUS in the amount of
14	\$1,961.28 for negotiating the purchase of said property.
15	Respondent SERRANO did not have a valid real estate license at
16	the time.
17	VI
18	The conduct, acts and/or omissions of Respondent MONEY
19	PLUS in employing and/or compensating Respondent SERRANO during
20	a period of time when Respondent SERRANO did not have a valid
21	real estate license are grounds for the suspension or revocation
22	of all licenses and license rights of Respondent MONEY PLUS
23	under the provisions of Code Section 10137.
24	
25	SECOND CAUSE OF ACCUSATION
26	(Violation of Code Sections 10130 and 10177(d))
27	
COURT PAPER STATE OF CALIFORNIA STD. II3 (REV. 3-95) OSP 98 10924	-3-

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1	VII
2	Complainant incorporates by reference the Preamble and
3	the allegations of Paragraphs I through V, inclusive.
4	VIII
5	Respondent SERRANO performed acts requiring a real
6	estate license as described in Code Section 10131(a) during the
7	period of time that Respondent SERRANO did not have a valid real
8	estate license.
9	VIIII .
10	The conduct, acts and/or omissions of Respondent
. 11	SERRANO, as described in Faragraph IV, violate Code Section
. 12	10130 and are grounds for the suspension or revocation of all
13	licenses and license rights of Respondent SERRANO under the
14	provisions of Code Section 10177(d).
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COURT PAPER STATE OF CALIFORNIA STD. 113 (REV. 3-93) OSP 98 10924	-4-

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WHERDFORE, Complainant prays that a hearing be 1 2 conducted on the allegations of this Accusation and that upon 3 proof thereof, a decision be rendered imposing disciplinary 4 action against all licenses and/or license rights of Respondent 5 MONEY PLUS FINANCIAL, INC. and Respondent CATALINA SERRANO under 6 the Real Estate Law (Part 1 of Division 4 of the Business and 7 Professions Code) and for such other and further relief as may 8 be proper under other applicable provisions of law. 9 Dated at Los Angeles, California 10 this 22nd day of September ,2000. 11 12 Deputy Réal Estate Commissioner 13 14 15 16 17 18 19 20 21 22 23 24 Money Plus Financial, Inc. cc: 25 Catalina Serrano Daniel M. Hatt 26 V Sacto AK 27 (REV. 3-95) -5-OSP 98 10924