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	FILED
3	JUN - 8 2011
4	DEPARTMENT OF REAL ESTATE
5	BY: Allo defat
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7	
8	BEFORE THE DEPARTMENT OF REAL ESTATE
9	STATE OF CALIFORNIA
10	* * *
11	In the Matter of the Accusation of) No. H-35827 LA
12	CHARLES MIKE DUNKELMAN,
13	Respondent.
14)
15	ORDER SUSPENDING REAL ESTATE LICENSE
16 17	To: CHARLES MIKE DUNKELMAN 101 North Citrus, #1C Covina, CA 91723
18	On February 24, 2010, the Real Estate Commissioner
19	issued a Decision effective April 1, 2010 pursuant to a
20	Stipulation and Agreement signed by CHARLES MIKE DUNKELMAN
21	("Respondent") in the Department of Real Estate Case No. H-35827
22	LA. The Decision suspends Respondent's real estate broker
23	license for sixty (60) days with a possible stay, and orders
24	Respondent must meet certain terms and conditions to avoid
25	further suspension. These terms and conditions include, but are
26	not limited to:
27	
	- 1 -

Respondent DUNKELMAN shall, within nine (9) v. months from the effective date of this Decision, present evidence satisfactory to the Commissioner that Respondent has, since the most recent issuance of an original or renewal real estate broker license, taken and successfully completed the continuing education requirements of Article 2.5 of Chapter 3 of the Real Estate Law for renewal of a real estate broker license. If Respondent DUNKELMAN fails to satisfy this condition, the Commissioner may order the suspension of the broker license of Respondent DUNKELMAN until Respondent DUNKELMAN presents such evidence. The Commissioner shall afford Respondent DUNKELMAN the opportunity for a hearing pursuant to the [Administrative Procedure Act] to present such evidence."

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As of January 1, 2011, Respondent has failed to
provide evidence that he took and successfully completed the
continuing education requirements.

¹³ NOW, THEREFORE, IT IS ORDERED under authority of
 ¹⁴ California Business and Professions Code Section 10156.7 that
 ¹⁵ Respondent's real estate broker license and the exercise of any
 ¹⁶ privileges thereunder are hereby suspended until Respondent
 ¹⁷ enters into an agreement satisfactory to the Commissioner to
 ¹⁸ provide such proof or a decision providing otherwise is adopted
 ¹⁹ following a hearing.

IT IS FURTHER ORDERED that all license certificates
and identification cards issued by the Department of Real Estate
which are in the possession of Respondent be immediately
surrendered by personal delivery or by mailing in the enclosed
self-addressed envelope to:

DEPARTMENT OF REAL ESTATE Attention: Flag Section P.O. Box 187000 Sacramento, CA 95818-7000

- 2 -

HEARING RIGHTS: You have the right to a hearing to contest the Commissioner's determination that you are in violation of the Order issued in this matter. If you desire a hearing, you must submit a written request. The request may be in any form, as long as it is in writing and indicates that you want a hearing. Unless a written request for a hearing, signed by or on behalf of you, is delivered or mailed to the Department of Real Estate at 320 West 4th Street, Suite 350, Los Angeles, CA 90013-1105, within 20 days after the date that this Order was mailed to or served on you, the Department of Real Estate will not be obligated or required to provide you with a hearing. This Order shall be effective immediately. Dated: , 2011. Real Estate Commissioner 3 -

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3	DEPARTMENT OF AFALESTATE
4	BY:
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8	BEFORE THE DEPARTMENT OF REAL ESTATE
9	STATE OF CALIFORNIA
10	* * *
11	In the Matter of the Accusation of) No. H-35827 LA
12	MDHT CORPORATION, doing business) L-2009050186
13	as American Loan Help Center, Gold) Key Funding and Gold Key)
14	Properties; and CHARLES MIKE) DUNKELMAN, individually, and doing)
15	business as Gold Key Funding and Gold Key Properties, and as
16	Designated officer for MDHT Corporation,
17	Respondent(s).
18	ORDER ACCEPTING VOLUNTARY SURRENDER OF REAL ESTATE LICENSE
19	On July 15, 2009, a First Amended Accusation was filed
20 21	in this matter against Respondent MDHT CORPORATION.
21	On January 14, 2010, Respondent petitioned the
22	Commissioner to voluntarily surrender its real estate corporation
23	license(s) pursuant to Section 10100.2 of the Business and
25	Professions Code.
26	IT IS HEREBY ORDERED that Respondent MDHT CORPORATION'S
27	petition for voluntary surrender of its real estate corporation
	- 1 -

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1	license(s) is accepted as of the effective date of this Order as
2	set forth below, based upon the understanding and agreement
3	expressed in Respondent's Declaration dated January 14, 2010
4	(attached as Exhibit "A" hereto). Respondent's license
5	certificate(s), pocket card(s) and any branch office license
6	certificate(s) shall be sent to the below listed address so that
7	they reach the Department on or before the effective date of this
8	Order:
9	DEPARTMENT OF REAL ESTATE
10	Attn: Licensing Flag Section P. O. Box 187000
11	Sacramento, CA 95818-7000
12	This Order shall become effective at 12 o'clock noon
13	on MAY 1 7 2010, 2010.
14	
15	DATED: $4/21$, 2010
16	, JEFF DAVI
17	Real Estate Commissioner
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19	(A. Stan
20	DV. Barbara (Birthy
21	BY: Barbara J. Bigby Chief Deputy Commissioner
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2	-	Exhibit "A"
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8	BEFORE THE DEPARTMENT OF	REAL ESTATE
9	STATE OF CALIFO	RNIA
10		
11		
12	In the Matter of the Accusation of)	No. H-35827 LA L-2009050186
13	MDHT CORPORATION, doing busi-) ness as American Loan Help)	
14	Center, Gold Key Funding and) Gold Key Properties; and)	
15	CHARLES MIKE DUNKELMAN, indi-) vidually, and doing business)	
16	as Gold Key Funding and Gold) Key Properties, and as desig-)	
17	nated officer for MDHT)	
1,8	Corporation,) Respondents.)	
1.9	In the Matter of the Desist and)	No. H-35885 LA L-2009050161
20	Refrain Order to:	
21	MDHT CORPORATION, doing busi-) ness as American Loan Help)	
22	Center, Gold Key Funding and) Gold Key Properties; and)	
23	CHARLES MIKE DUNKELMAN, indi-) vidually, and doing business)	
24		•
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26		-
27		, ··

DECLARATION

My name is Charles Mike Dunkelman. MDHT CORPORATION is licensed as a real estate corporation and/or has license rights with respect to said license. I am currently an officer of MDHT CORPORATION, and am authorized and empowered to sign this declaration on behalf of MDHT CORPORATION. MDHT CORPORATION is represented in this matter by Frank Buda, Esq.

In lieu of proceeding in this matter in accordance with the provisions of the Administrative Procedure Act (Sections 11400 et seq., of the Government Code) MDHT CORPORATION wishes to voluntarily surrender its real estate license issued by the Department of Real Estate ("Department"), pursuant to the provisions of Business and Professions Code Section 10100.2.

I understand that MDHT CORPORATION, by so voluntarily surrendering its license, can only have it reinstated in accordance with the provisions of Section 11522 of the Government Code. I also understand that by so voluntarily surrendering its license, MDHT CORPORATION agrees to the following:

1. The filing of this Declaration shall be deemed as the petition of MDHT CORPORATION for voluntary surrender.

2. It shall also be deemed to be an understanding and agreement by MDHT CORPORATION that it waives all rights it has to require the Commissioner to prove the allegations contained in the Accusation and Desist and Refrain Order filed in this matter at a hearing held in accordance with the provisions of the Administrative Procedure Act (Government Code Sections 11400 et

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seq.), and that MDHT CORPORATION also waives other rights afforded to it in connection with the hearing such as the right to discovery, the right to present evidence in defense of the allegations in the Accusation and the Desist and Refrain Order and the right to cross-examine witnesses.

I further agree that upon acceptance by the 3. 6 Commissioner, as evidenced by an appropriate order, all 7 affidavits and all relevant evidence obtained by the Department 8 in this matter prior to the Commissioner's acceptance, and all 9 allegations contained in the Accusation filed by the Department 10 in Case No. H-35827 LA and in the Desist and Refrain Order issued 11 by the Department, Case No. H-35885 LA, may be considered by the 12 Department to be true and correct for the purpose of deciding 13 whether to grant relicensure or reinstatement of MDHT 14 CORPORATION's license pursuant to Government Code Section 11522. 15

4. I am acting freely and voluntarily on behalf of
MDHT CORPORATION to surrender its license and all license rights
attached thereto.

I declare under penalty of perjury under the laws of the State of California that the above is true and correct.

Date and Place

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Charles Mike Dunkelman

- 3.-

, 1	Department of Real Estate 320 West 4th Street, Suite 350
2	Los Angeles, CA 90013-1105
3	Telephone: (213) 576-6982
4	MAR - 3 2010
5	DEPARTMENT OF REAL ESTATE BY:
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9	BEFORE THE DEPARTMENT OF REAL ESTATE
10	STATE OF CALIFORNIA
11	* * *
12	
13	In the Matter of the Accusation of) No. H-35827 LA) L-2009050186
14	MDHT CORPORATION, doing busi-) ness as American Loan Help) STIPULATION AND
15	Center, Gold Key Funding and) AGREEMENT RE:
16	Gold Key Properties; and) ACCUSATION AND ORDER CHARLES MIKE DUNKELMAN, indi-) VACATING DESIST AND
17	vidually, and doing business) REFRAIN ORDER
18	as Gold Key Funding and Gold) Key Properties, and as desig-)
19	nated officer for MDHT) Corporation,)
	Respondents.
20	In the Matter of the Desist and) No. H-35885 LA
21	Refrain Order to:) L-2009050161
22	MDHT CORPORATION, doing busi-)
23	ness as American Loan Help) Center, Gold Key Funding and)
24	Gold Key Properties; and)
25	<u>CHARLES MIKE DUNKELMAN, indi-</u>) vidually, and doing business)
.26	as Gold Key Funding and Gold)
27	Key Properties, and as desig-) nated officer for MDHT)
	Corporation.)

It is hereby stipulated by and between CHARLES MIKE DUNKELMAN ("DUNKELMAN"), individually and as designated officer for MDHT, and his attorney, Frank Buda, Esq., and the Complainant, acting by and through Cheryl Keily, Counsel for the Department of Real Estate ("Department"), as follows for the purpose of settling and disposing of the First Amended Accusation (the "Accusation") filed on July 15, 2009.

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1. All issues which were to be contested and all 10 evidence which was to be presented by Complainant and DUNKELMAN 11 at a formal hearing on the Accusation, which hearing was to be 12 held in accordance with the provisions of the Administrative 13 14 Procedure Act ("APA"), shall instead and in place thereof be 15 submitted solely on the basis of the provisions of this 16 Stipulation and Agreement. 17

2. DUNKELMAN has been served with, read and 18 understands the Statement to Respondent, the Discovery Provisions of the APA and the Accusation filed by the Department 20 21 of Real Estate in this proceeding.

22 3. On May 16, 2009, DUNKELMAN filed a Notice of 23 Defense pursuant to section 11505 of the Government Code for the 24 purpose of requesting a hearing on the allegations in the 25 Accusation. DUNKELMAN hereby freely and voluntarily withdraws 26 said Notice of Defense. DUNKELMAN acknowledges that he 27 understands that by withdrawing said Notice of Defense he will

thereby waive his right to require the Commissioner to prove the allegations in the Accusation at a contested hearing held in accordance with the provisions of the APA, and that DUNKELMAN will waive other rights afforded to him in connection with the hearing, such as the right to present evidence in defense of the allegations in the Accusation and the right to cross-examine witnesses.

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9 4. This Stipulation and Agreement is based on the 10 factual allegations contained in Paragraphs 1 through 6, 14(a), 11 14(e), 14(f), 14(j) and 22 of the Accusation filed in this 12 In the interest of expedience and economy DUNKELMAN proceeding. 13 chooses not to contest these factual allegations, but to remain 14 silent and understands that, as a result thereof, these factual 15 16 statements, without being admitted or denied, will serve as a 17 prima facie basis for the disciplinary action stipulated to 18 herein.

5. This Stipulation and Agreement and DUNKELMAN's 20 decision not to contest the Accusation are hereby expressly 21 limited to this proceeding and made for the sole purpose of 22 23 reaching an agreed disposition of this proceeding. DUNKELMAN's 24 decision not to contest the factual allegations is made solely 25 for the purpose of effectuating this Stipulation and Agreement 26 and is intended by DUNKELMAN to be non-binding upon him in any 27 actions against him by third parties. The Real Estate

Commissioner shall not be required to provide further evidence to prove such allegations.

6. It is understood by the parties that the Real Estate Commissioner may adopt the Stipulation and Agreement as his decision in this matter as set forth in the below "Order". In the event that the Commissioner in his discretion does not adopt the Stipulation and Agreement, it shall be void and of no effect, and DUNKELMAN shall retain the right to a hearing and proceeding on the Accusation under all the provisions of the APA and shall not be bound by any admission or waiver made herein.

7. 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 17 with respect to any matters which were not alleged to be causes 18 for accusation or denial in this proceeding. 19

DETERMINATION OF ISSUES

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

The conduct, acts and/or omissions of DUNKELMAN, set forth in the Accusation, constitute cause under Business and

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. 1	Professions Code (the "Code") Sections 10145, 10146, 10159.5
2	10163 and 10236.4 as well as Sections 2731, 2752, 2832(a),
3	2950(d) and 2951 of Chapter 6, Title 10, California Code of
. 4.	Regulations for suspension or revocation of DUNKELMAN's license
5	and license rights under the Real Estate Law.
7	ORDER
8	WHEREFORE, THE FOLLOWING ORDER is hereby made:
9	I. All licenses and licensing rights of DUNKELMAN
10	under the Real Estate law shall be suspended for a period of
11	sixty (60) days from the effective date of this Decision.
12 13	A. Provided, however, that if DUNKELMAN requests,
13	thirty (30) days of said suspension, or a portion thereof,
15	shall be stayed upon condition that:
16	1. Pursuant to Section 10175.2 of the Code at the
17	rate of \$50 for each day of the suspension for a total monetary
18	penalty of \$1,500 in total.
19	2. Said payment shall be in the form of a cashier's
20 21	check or certified check made payable to the Recovery Account
22	of the Real Estate Fund. Said check must be received by the
23	Department prior to the effective date of the Decision in this
24 [.]	matter.
25	3. No further cause for disciplinary action against
26	the real estate license of DUNKELMAN occurs within two (2)
27	years from the effective date of the Decision in this matter.
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4. If DUNKELMAN 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 DUNKELMAN shall not be entitled to any repayment nor credit, prorated or otherwise, for money paid to the Department under the terms of this Decision.

5. If DUNKELMAN pays the monetary penalty and if no 10 further cause for disciplinary action against the real estate license of DUNKELMAN occurs within two (2) years from the effective date of the Decision, the stay hereby granted shall become permanent. 14

B. The remaining thirty (30) days of the sixty (60) 15 day suspension shall be stayed for two (2) years upon the 16 following terms and conditions: 17

DUNKELMAN shall obey all laws, rules and 1. regulations governing the rights, duties and responsibilities of real estate licensees in the State of California.

2. That no final subsequent determination be made, after hearing or upon stipulation, that cause for disciplinary action occurred within two (2) years of the effective date of this Decision. Should such a determination be made, the Commissioner may, in his discretion, vacate and set aside the stay order and reimpose all or a portion of the stayed

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suspension. Should no such determination be made, the stay imposed herein shall become permanent.

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II. Pursuant to Section 10148 of the Code, DUNKELMAN 3 4 shall pay (a) the Commissioner's reasonable cost for the audit 5 (Audit No. LA 080215) which lead to the instant disciplinary 6 proceeding against MDHT CORPORATION, and (b) the Commissioner's 7 reasonable cost of a subsequent audit to determine if MDHT 8 CORPORATION is in compliance with the Real Estate Law. The 9 cost of the audit which lead to the instant disciplinary action 10 against MDHT CORPORATION is \$7,882.30. In calculating the 11 12 amount of the Commissioner's real cost, the Commissioner may 13 use the estimated average hourly salary for all persons 14 performing audits of real estate brokers, and shall include an 15 allocation for travel time to and from the auditor's place of 16 work. Said cost for the prior and subsequent audits shall not 17 18 exceed \$15,764.60.

DUNKELMAN shall pay such cost within 60 days of receiving an invoice from the Commissioner detailing the activities performed during the audit and the amount of time spent performing the audit.

The Commissioner may suspend the license of DUNKELMAN pending a hearing held in accordance with Section 11500, et seq., of the Government Code if payment is not timely made as provided for herein, or as provided for in a subsequent

agreement between DUNKELMAN and the Commissioner of Real · 1 Estate. The suspension shall remain in effect until payment is 2 3 made in full or until DUNKELMAN enters into an agreement 4 satisfactory to the Commissioner of Real Estate to provide for 5 payment, or until a decision providing otherwise is adopted 6 following a hearing held pursuant to this condition. 7 III. Prior to the effective date of this Decision 8 Respondent DUNKELMAN shall provide evidence that the shortage 9 10 determined in Audit No. LA 080215 of Respondent MDHT 11 CORPORATION in the amount of \$9,347.25 has been cured. If 12 Respondent DUNKELMAN fails to provide such evidence the 13 Commissioner may order suspension of Respondent DUNKELMAN's 14 license until Respondent DUNKELMAN presents such evidence. 15 All licenses and licensing rights of Respondent 16 IV. DUNKELMAN are indefinitely suspended unless or until Respondent 17 18 provides proof satisfactory to the Commissioner, of having 19 taken and successfully completed the continuing 20 education course on trust fund accounting and handling 21 specified in paragraph (3) of subdivision (a) of Section 22 10170.5 of the Code. Proof of satisfaction of this requirement 23 includes evidence that respondent has successfully completed 24 25 the trust fund account and handling continuing education course 26 within 120 days prior to the effective date of the Decision in 27 this matter.

V. Respondent DUNKELMAN shall, within nine (9)

months from the effective date of this Decision, present evidence satisfactory to the Commissioner that Respondent DUNKELMAN has, since the most recent issuance of an original or renewal real estate broker license, taken and successfully completed the continuing education requirements of Article 2.5 of Chapter 3 of the Real Estate Law for renewal of a real estate broker license. If Respondent DUNKELMAN fails to satisfy this condition, the Commissioner may order the suspension of the broker license of Respondent DUNKELMAN until Respondent DUNKELMAN presents such evidence. The Commissioner shall afford Respondent DUNKELMAN the opportunity for a hearing pursuant to the APA to present such evidence.

DATED: Top. 8,2010

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CHERYL KEILY, Counsel DEPARTMENT OF REAL ESTATE

I have read the Stipulation and Agreement, and 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 (including but not limited to Sections 11506, 11508, 11509 and 11513 of the Government Code), and I willingly, intelligently and voluntarily waive those rights,

including the right of requiring the Commissioner to prove the findings 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.

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DATED:

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Respondent CHARLES MIKE DUNKELMAN can signify 6 acceptance and approval of the terms and conditions of this 7 Stipulation and Agreement by faxing a copy of its signature 8 page, as actually signed by Respondent, to the Department at 9 10 the following telephone/fax number (213) 576-6917. Respondent 11 CHARLES MIKE DUNKELMAN agrees, acknowledges, and understands 12 that by electronically sending to the Department a fax copy of 13 the actual signature as it appears on the Stipulation and 14 Agreement, that receipt of the faxed copy by the Department 15 shall be as binding on him as if the Department had received 16 17 the original signed Stipulation and Agreement.

CHARLES MIKE DUNKELMAN

- 11	
1	ORDER PURSUANT TO STIPULATION AND AGREEMENT
2	The foregoing Stipulation and Agreement is hereby
3	adopted by me as my Decision in this matter as to CHARLES MIKE
4	DUNKELMAN, and shall become effective on APR -1 2010
5	IS IT SO ORDERED, 2010.
6	
7	
8	JEFF DAVI Real Estate Commissioner
9	AIRE
10	<u> </u>
12	ORDER VACATING DESIST AND REFRAIN ORDER
13	THE FOLLOWING ORDER is hereby made:
14	On April 15, 2009, the Real Estate Commissioner
15	issued to MDHT CORPORATION, doing business as American Loan
16	
17	Help Center, Gold Key Funding and Gold Key Properties, and
18	CHARLES MIKE DUNKELMAN, individually and as designated officer
19	for MDHT Corporation an Order to Desist and Refrain from
20	performing any and all acts for which a real estate broker
21	license is required until such time as they comply with all
22	provisions of the Real Estate Law as discussed in the Order to
23	Desist and Refrain.
24	Good cause has been shown why the said Desist and
25 26	Refrain Order should be vacated.
20	NOW, THEREFORE, IT IS ORDERED that the Order to
	Desist and Refrain issued to MDHT CORPORATION, doing business
•	Desist and Kellain Issued to mini contonation, as b

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as American Loan Help Center, Gold Key Funding and Gold Key . 1 Properties, and CHARLES MIKE DUNKELMAN, individually and as designated officer for MDHT Corporation, on April 15, 2009, is hereby vacated. This Order shall be effective immediately. FEB 2 4 2010 _____, 2010 DATED: , **8** JEFF DAVI Real Estate Commissioner $\mathbf{12}$

1 2 Exhibit "A" 3 4 5 6 7 BEFORE THE DEPARTMENT OF REAL ESTATE 8 - F 9 STATE OF CALIFORNIA 10 11 H-35827 LA NO. In the Matter of the Accusation of) 12 L-2009050186 MDHT CORPORATION, doing busi-13 ness as American Loan Help Center, Gold Key Funding and 14 Gold Key Properties; and CHARLES MIKE DUNKELMAN, indi-15 vidually, and doing business 16 as Gold Key Funding and Gold Key Properties, and as desig-17 nated officer for MDHT Corporation, 18 Respondents. 19 H-35885 LA In the Matter of the Desist and No. L-2009050161 Refrain Order to: 20 MDHT CORPORATION, doing busi-21 ness as American Loan Help Center, Gold Key Funding and 22 Gold Key Properties; and CHARLES MIKE DUNKELMAN, indi-23 vidually, and doing business as Gold Key Funding and Gold 24 Key Properties, and as desig-25 nated officer for MDHT Corporation. 26 27 1

DECLARATION

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2 My name is Charles Mike Dunkelman. MDHT CORPORATION is 3 licensed as a real estate corporation and/or has license rights 4 with respect to said license. I am currently an officer of MDHT 5 CORPORATION, and am authorized and empowered to sign this 6 declaration on behalf of MDHT CORPORATION. MDHT CORPORATION is 7 represented in this matter by Frank Buda, Esq. 8 In lieu of proceeding in this matter in accordance with 9 the provisions of the Administrative Procedure Act (Sections 10 11400 et seq., of the Government Code) MDHT CORPORATION wishes to 11 voluntarily surrender its real estate license issued by the 12 Department of Real Estate ("Department"), pursuant to the 13 provisions of Business and Professions Code Section 10100.2. 14 I understand that MDHT CORPORATION, by so voluntarily 15 surrendering its license, can only have it reinstated in 16 accordance with the provisions of Section 11522 of the Government 17 I also understand that by so voluntarily surrendering its Code.

license, MDHT CORPORATION agrees to the following:

1. The filing of this Declaration shall be deemed as the petition of MDHT CORPORATION for voluntary surrender.

2. It shall also be deemed to be an understanding and agreement by MDHT CORPORATION that it waives all rights it has to require the Commissioner to prove the allegations contained in the Accusation and Desist and Refrain Order filed in this matter at a hearing held in accordance with the provisions of the Administrative Procedure Act (Government Code Sections 11400 et

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seq.), and that MDHT CORPORATION also waives other rights afforded to it in connection with the hearing such as the right to discovery, the right to present evidence in defense of the allegations in the Accusation and the Desist and Refrain Order and the right to cross-examine witnesses.

I further agree that upon acceptance by the 3. 6 Commissioner, as evidenced by an appropriate order, all 7 affidavits and all relevant evidence obtained by the Department 8 in this matter prior to the Commissioner's acceptance, and all 9 allegations contained in the Accusation filed by the Department 10 in Case No. H-35827 LA and in the Desist and Refrain Order issued 11 by the Department, Case No. H-35885 LA, may be considered by the 12 Department to be true and correct for the purpose of deciding 13 whether to grant relicensure or reinstatement of MDHT 14 CORPORATION's license pursuant to Government Code Section 11522. 15

4. I am acting freely and voluntarily on behalf of
MDHT CORPORATION to surrender its license and all license rights
attached thereto.

I declare under penalty of perjury under the laws of the State of California that the above is true and correct.

21 09- com 22 Date and Place

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Charles Mike Dunkelman

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<i>`\</i>	1 2 3 4 5 6 7 8	CHERYL D. KEILY, SNB# 94008 Department of Real Estate 320 West Fourth Street, Ste. 350 Los Angeles, California 90013 Telephone: (213) 576-6982 (Direct) (213) 576-5770	FILED JUL 1 5 2009 DEPARTMENT OF REAL ESTATE BY: MADD
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	10	DEPARTMENT OF RE STATE OF CAL	
	11	STATE OF CAL.	
	12	In the Matter of the Accusation	No. H-35827 LA
	13	MDHT CORPORATION, doing busi-	
	14	ness as American Loan Help Center, Gold Key Funding and	FIRST AMENDED
	15	Gold Key Properties; and CHARLES MIKE DUNKELMAN, indi-	ACCUSATION
	16	vidually, and doing business as Gold Key Funding and Gold)
	17 18	Key Properties, and as desig- nated officer for MDHT Corporation,	
	19	Respondents.	
	20		
	21	This First Amended Accusat	tion amends the Accusation
	22	filed on April 3, 2009.	
	23	The Complainant, Robin Tr	ujillo, a Deputy Real Estate
	24	Commissioner of the State of Califo	rnia, for cause of Accusation
	25	against MDHT CORPORATION, doing bus:	iness as American Loan Help
	26 27	Center, Gold Key Funding and Gold Ke	ey Properties, and CHARLES
		- 1 -	

MIKE DUNKELMAN ("DUNKELMAN"), individually, and doing business as 1 Gold Key Funding and Gold Key Properties, and as designated 2 officer for MDHT Corporation, is informed and alleges as follows: 3 1. 4 The Complainant, Robin Trujillo, a Deputy Real Estate 5 Commissioner of the State of California, makes this Accusation in 6 her official capacity. 7 2. 8 9 Respondent MDHT CORPORATION is presently licensed 10 and/or has license rights under the Real Estate Law (Part 1 of 11 Division 4 of the Business and Professions Code, hereinafter 12 "Code"), as a corporate real estate broker acting by and through 13 Respondent DUNKELMAN as its designated broker-officer at all 14 times relevant herein. 15 3. 16 Respondent DUNKELMAN is presently licensed and/or has 17 license rights under the Real Estate Law as a real estate broker 18 and designated broker-officer of Respondent MDHT CORPORATION. 19 4. 20 At all times material herein for compensation, or in 21 expectation of compensation, Respondents engaged in the business 22 of soliciting borrowers or lenders, or negotiating loans, 23 including but not limited to loan modifications, or collecting 24 payments, or performing services for borrowers or lenders or note 25 owners in connection with loans secured directly or collaterally 26 by liens on real property on behalf of another or others within 27

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the meaning of Code Section 10131(d).

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2 All further references to respondents herein include 3 Respondents MDHT CORPORATION and DUNKELMAN, and also include Δ officers, directors, employees, agents and real estate licensees 5 employed by or associated with MDHT CORPORATION and DUNKELMAN, 6 and who at all times herein mentioned were engaged in the 7 furtherance of the business or operations of Respondents MDHT 8 9 CORPORATION and DUNKELMAN, and who were acting within the course 10 and scope of their authority and employment. 11 6. 12 At all times relevant herein Respondent DUNKELMAN, as 13 the officer designated by Respondent MDHT CORPORATION pursuant to 14 Section 10211 of the Code, was responsible for the supervision 15 and control of the activities conducted on behalf of Respondent 16 MDHT CORPORATION by its officers and employees as necessary to 17 secure full compliance with the Real Estate Law as set forth in 18 Section 10159.2 of the Code. 19 FIRST CAUSE OF ACCUSATION 20 (Advance Fee Violation) 21 7. 22 At all times mentioned herein, in the State of 23 California, Respondents MDHT CORPORATION and DUNKELMAN engaged in 24 the business of claiming, demanding, charging, receiving, 25 collecting or contracting for the collection of advance fees, 26 within the meaning of Code Section 10026, including, but not 27

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limited to, the following loan modification activities with respect to loans which were secured by liens on real property:

a. On or about July 17, 2008, Respondents collected an advance fee of \$995 from Candy Cook pursuant to the provisions of a written agreement pertaining to loan modification services to be provided by Respondents with respect to a loan secured by the real property located at 16687 Las Ramblas, Unit F, Parker, Colorado 80134.

⁹ b. On or about August 13, 2008, Respondents collected
¹⁰ an advance fee of \$500 from Normal Aleman pursuant to the
¹¹ provisions of a written agreement pertaining to loan modification
¹² services to be provided by Respondents with respect to a loan
¹³ secured by the real property located at 1239 Sea Reef Drive, San
¹⁴ Diego, California 92154.

c. On or about September 8, 2008, Respondents collected an advance fee totaling \$1,418 from Kathy Stubbs pursuant to the provisions of a written agreement pertaining to loan modification services to be provided by Respondents with respect to a loan secured by the real property located at 3003 Airway Street, East Wenatchee, Washington 98802.

8.

Respondents collected the advance fees described in
 Paragraph 7, above, pursuant to the provisions of a document
 which constitutes an advance fee agreement within the meaning of
 Code Section 10085.

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Respondents failed to submit the written agreements 2 referred to in Paragraph 7, above, to the Commissioner ten days 3 before using them in violation of Code Section 10085 and Δ Regulation 2970. 5 10. 6 The conduct, acts and/or omissions of Respondents MDHT 7 8 CORPORATION and DUNKELMAN, as set forth above, are cause for the 9 suspension or revocation of the licenses and license rights of 10 Respondent MDHT CORPORATION and Respondent DUNKELMAN pursuant to 11 Code Sections 10085, 10177(d) and/or 10177(g). 12 SECOND CAUSE OF ACCUSATION (Audit Violations) 13 11 14 15 Complainant hereby incorporates by reference the 16 allegations set forth in Paragraphs 1 through 10, above. 17 12. 18 On or about May 14, 2009, the Department completed an 19 audit examination of the books and records of MDHT CORPORATION 20 pertaining to the real estate activities described in Paragraphs 21 4 and 7, above, covering a period from January 1, 2008, to March 22 31, 2009.

13.

At all times mentioned herein, and in connection with the activities described in Paragraphs 4 and 7, above, Respondent MDHT CORPORATION accepted or received funds, including advance

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fees to be held in trust from or on behalf of actual or 1 prospective parties to transactions handled by MDHT, and 2 thereafter made deposits and/or disbursements of such funds. 3 From time-to-time herein mentioned during the audit period, said 4 trust funds were deposited into an account maintained by 5 Respondent as follows: 6 7 Account Name: "1135 E. Route 66, 8 LLC dba American Loan Help Center" "BA #1" 9 Account No. 0241170432 Bank of America Bank Name: 10 Charles Mike Dunkelman Signatories: Joe Anthony Fields 11 Fred Robert Faught Vicki Fields 12 Joanne Faught 13 14. 14 The audit examination revealed violations of the Code 15 and the Regulations, as set forth in the following paragraphs, 16 and more fully discussed in Audit Report No. LA 080215 along with 17 the exhibits and work papers attached to the audit report: 18 (a) Failed to maintain B/A #1 in the name of Respondent 19 MDHT CORPORATION as trustee at a bank or other financial 20 institution and to designate the account as a trust account for 21 the deposit of advance fees ("trust funds") collected by MDHT 22 CORPORATION in violation of Code Sections 10145 and 10146 and 23 24 Sections 2832(a), 2950(d) and 2951 of the Regulations. 25 (b) Failed to deposit the advance fees described in 26 Paragraph 7, above, into a real estate broker trust account in 27 violation of Code Section 10146. - 6 -

Permitted, allowed or caused the withdrawal or (c)1 disbursement of trust funds from BA #1 so that as of March 31, 2 2009, the trust account had a shortage of \$9,347.25. Respondents 3 caused, permitted and/or allowed said withdrawal or disbursement 4 of trust funds from account BA #1 so that the total of aggregate 5 funds remaining in the trust account was less than the existing 6 aggregate trust fund liability of Respondent MDHT CORPORATION to 7 every principal who was an owner of said funds without first 8 obtaining the prior written consent of the owners of said funds 9 10 as is required by Code Section 10145 and Sections 2832.1, 11 2950(d), 2950(g) and 2951 of the Regulations.

12 Permitted two unlicensed and unbonded persons, (d) Vicky Fields and Joanne Faught, as authorized signatories on 14 account BA #1 in violation of Code Section 10145 and Section 2834 15 of the Regulations.

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Used the fictitious names "MDHT" and "Gold Key" on (e) some Mortgage Loan Disclosure Statements and Broker-Associate 18 Agreements and used the business name "1135 E. Route 66, LLC" on 19 account BA #1 without holding a license bearing said fictitious 20 business names in violation of Code Section 10159.5 and Section 21 2731 of the Regulations.

Failed to notify the Department within five days (f)of the employment of salespersons Christine Garcia, Joe Anthony Fields and Fred Robert Faught as is required by Code Section 10161.8 and Section 2752 of the Regulations.

Failed to maintain the original salesperson (q) license certificate for Jimmy William Smith in violation of Code

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section 10160 and Section 2753 of the Regulations.

(h) Failed to maintain an Independent Contractor Agreement with Debbie Grohs and Jimmy William Smith in violation of Section 2726 of the Regulations.

(i) Failed to disclose loan commissions and other fees
 paid to Respondent MDHT CORPORATION on the Mortgage Loan
 Disclosure Statement in the column designated "Paid To Broker" in
 violation of Code Section 10240 and Section 2840 of the
 Regulations.

(j) Failed to disclose the corporate real estate license number of Respondent MDHT CORPORATION on the Mortgage Loan Disclosure Statement in two of eight files examined by the auditors in violation of Code Section 10236.4.

(k) Respondent DUNKELMAN failed to have a system in place for regularly monitoring compliance with the Real Estate Law, particularly with respect to establishing systems, policies and procedures to review trust fund handling in violation of Code Sections 10159.2 and 10177(h) and Section 2725 of the Regulations.

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1	DISCIPLINE STA	TUTES AND REGULATIONS
2		15.
3	The conduct of Resp	ondents MDHT CORPORATION and
4	DUNKELMAN described in Paragr	aph 14, above, violated the Code and
5	the Regulations as set forth	below:
6	PARAGRAPH	PROVISIONS VIOLATED
7	14(a)	Code Section 10145, 10146 and
8		Sections 2832(a), 2950(d) and 2951
9		of the Regulations
10	14(b)	Code Section 10146
11	14(c)	Code Section 10145 and Sections
13		2832.1, 2950(d) 2950(g) and 2951 of
14		the Regulations
15	14(d)	Code Section 10145 and Section 2834
16		of the Regulations
17	14(e)	Code Section 10159.5 and Section
18	14(8)	2731 of the Regulations
19		
20	14(f)	Code Section 10161.8 and Section
21		2752 of the Regulations
22 23	14(g)	Code Section 10160 and Section 2753
24		of the Regulations
25	. 14(h)	Section 2726 of the Regulations
26	14(i)	Code Section 10240 and Section 2840
27		of the Regulations
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1	14(j) Code Section 10236.4	
2	14(k) Code Section 10159.2	
3	and Section 2725 of the	
4	Regulations	
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б	16.	
7	The foregoing violations, as set forth hereinabove,	
8	constitute cause for the suspension or revocation of the real	
9	estate licenses and license rights of MDHT CORPORATION and	
10	DUNKELMAN under the provisions of Code Sections 10177(d) for	
11	violation of the Real Estate Law and/or 10177(g) for negligence	
12		
14		
15	THIRD CAUSE OF ACCUSATION (Unlicensed Activity)	
16	17.	
17	Complainant hereby incorporates by reference the	
18	allegations set forth in Paragraphs 1 through 16, above.	
19	18.	
20	The activities described in Paragraphs 4 and 7, above,	-
21	require a real estate license under Sections 10131(d) and 10131.	2
. 22	of the Code.	
23	19.	
24	Respondents violated Section 10137 of the Code by	
25	employing and/or compensating individuals who were not licensed	
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as a real estate salesperson or as a broker to perform activities requiring a license as follows:

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a. Respondents employed and/or compensated Bret Lyon to perform some or all of the services alleged in Paragraphs 4, and 7(a), above, though he was not licensed as a real estate salesperson or broker.

b. Respondents employed and/or compensated Armando Ramirez to perform some or all of the services alleged in Paragraphs 4 and 7(b), above, though he was not licensed as a real estate salesperson or broker.

c. Respondents employed and/or compensated Carl Velasquez to perform some or all of the services alleged in Paragraphs 4 and 7(c), above, though he was not licensed as a real estate salesperson or broker.

20.

The conduct, acts and/or omissions of Respondents MDHT CORPORATION and DUNKELMAN, as set forth in Paragraph 15, above, violate Code Section 10137, and are cause for the suspension or revocation of the licenses and license rights of Respondents MDHT CORPORATION and DUNKELMAN pursuant to Code Sections 10177(d) and/or 10177(g).

FOURTH CAUSE OF ACCUSATION (Branch Office Violation)

21.

Complainant hereby incorporates by reference the allegations set forth in Paragraphs 1 through 20, above.

- 11 -

1 Respondents engaged in a real estate brokerage business 2 at 1135 E. Route 66, Suite 201, Glendora, California 91740, a 3 location for which Respondents failed to apply for and procure 4 from the Department an additional license for the branch office 5 being maintained by them, in violation of Section 10163 of the 6 7 Code. 23. 8 9 The conduct, acts and/or omissions of Respondents, as 10 set forth in Paragraph 22, above, violate Code Section 10163 and 11 are cause for the suspension or revocation of the licenses and 12 license rights of Respondent pursuant to Code Sections 10165, 13 10177(d) and/or 10177(g). 14 FIFTH CAUSE OF ACCUSATION (Failure to Supervise) 15 24. 16 17 Complainant incorporates by reference the allegations 18 contained in Paragraphs 1 through 23, above. 19 25. 20 Respondent DUNKELMAN ordered, caused, authorized or 21 participated in the conduct of Respondent MDHT CORPORATION, as is 22 alleged in this Accusation. 23 26. 24 The conduct, acts and/or omissions, of Respondent 25 DUNKELMAN, in allowing Respondent MDHT CORPORATION to violate the 26 Real Estate Law, as set forth above, constitutes a failure by 27 - 12 -

22.

DUNKELMAN, as the officer designated by a corporate broker licensee, to exercise the supervision and control over the activities of MDHT CORPORATION, as required by Code Section 10159.2, and is cause to suspend or revoke the real estate 4 licenses and license rights of DUNKELMAN under Code Sections 5 10177(d), 10177(g) and/or 10177(h). 6

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WHEREFORE, Complainant prays that a hearing be 7 conducted on the allegations of this Accusation and that upon 8 proof thereof, a decision be rendered imposing disciplinary 9 action against all the licenses and license rights of Respondent 10 11 MDHT CORPORATION, and Respondent CHARLES MIKE DUNKELMAN, 12 individually, and as designated broker-officer of Respondent MDHT 13 Corporation, under the Real Estate Law (Part 1 of Division 4 of 14 the Business and Professions Code), and for such other and 15 further relief as may be proper under other applicable provisions 16 of law. 17 Dated at Los Angeles, California 18 this 15 day of _ 2009. 19 20 ujillo 21 Robin Trujillo Deputy Real Estate Commissioner 22 23 24 25 MDHT CORPORATION cc: 26 CHARLES MIKE DUNKELMAN Robin Trujillo 27 Sacto. Frank M. Buda, esq.

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1 2 3	CHERYL D. KEILY, SNB# 94008 Department of Real Estate 320 West Fourth Street, Ste. 350 Los Angeles, California 90013
4	Telephone: (213) 576-6982 APR - 3 2009 (Direct) (213) 576-5770 DEPARTMENT OF REFLECTATE
5	BY: DDZ
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9	DEPARTMENT OF REAL ESTATE
10	STATE OF CALIFORNIA
11	* * * *
. 12	In the Matter of the Accusation No.H-35827 LA
13 14	MDHT CORPORATION, doing busi-)A C C U S A T I O Nness as American Loan Help)Center, Gold Key Funding and
15 16	Gold Key Properties; and) CHARLES MIKE DUNKELMAN, indi-) vidually, and doing business)
17	as Gold Key Funding and Gold) Key Properties, and as desig-) nated officer for MDHT) Corporation,)
. 19) Respondents.)
20)
21	The Complainant, Robin Trujillo, a Deputy Real Estate
22 23	Commissioner of the State of California, for cause of Accusation
24	against MDHT CORPORATION, doing business as American Loan Help
25	Center, Gold Key Funding and Gold Key Properties, and CHARLES
26	MIKE DUNKELMAN ("DUNKELMAN"), individually, and doing business as
. 27	Gold Key Funding and Gold Key Properties, and as designated
	- 1 -

officer for MDHT Corporation, is informed and alleges as follows:

1.

The Complainant, Robin Trujillo, a Deputy Real Estate Commissioner of the State of California, makes this Accusation in her official capacity.

2.

Respondent MDHT CORPORATION is presently licensed and/or has license rights under the Real Estate Law (Part 1 of Division 4 of the Business and Professions Code, hereinafter "Code"), as a corporate real estate broker acting by and through Respondent DUNKELMAN as its designated broker-officer at all times relevant herein.

3.

Respondent DUNKELMAN is presently licensed and/or has license rights under the Real Estate Law as a real estate broker and designated broker-officer of Respondent MDHT CORPORATION.

4.

All further references to respondents herein include 19 Respondents MDHT CORPORATION and DUNKELMAN, and also include 20 officers, directors, employees, agents and real estate licensees 21 employed by or associated with MDHT CORPORATION and DUNKELMAN, 22 and who at all times herein mentioned were engaged in the 23 furtherance of the business or operations of Respondents MDHT 24 CORPORATION and DUNKELMAN, and who were acting within the course 25 and scope of their authority and employment. 26

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At all times relevant herein Respondent DUNKELMAN, as the officer designated by Respondent MDHT CORPORATION pursuant to Section 10211 of the Code, was responsible for the supervision and control of the activities conducted on behalf of Respondent MDHT CORPORATION by its officers and employees as necessary to secure full compliance with the Real Estate Law as set forth in Section 10159.2 of the Code.

FIRST CAUSE OF ACCUSATION (Advance Fee Violation)

6.

At all times mentioned herein, in the State of California, Respondents MDHT CORPORATION and DUNKELMAN engaged in the business of claiming, demanding, charging, receiving, collecting or contracting for the collection of advance fees, within the meaning of Code Section 10026, including, but not limited to, the following loan modification activities with respect to loans which were secured by liens on real property:

a. On or about July 17, 2008, Respondents collected
an advance fee of \$995 from Candy Cook pursuant to the provisions
of a written agreement pertaining to loan modification services
to be provided by Respondents with respect to a loan secured by
the real property located at 16687 Las Ramblas, Unit F, Parker,
Colorado 80134.

²⁵ b. On or about August 13, 2008, Respondents collected
 ²⁶ an advance fee of \$500 from Norma[®] Aleman pursuant to the
 ²⁷ provisions of a written agreement pertaining to loan modification

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services to be provided by Respondents with respect to a loan secured by the real property located at 1239 Sea Reef Drive, San Diego, California 92154.

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c. On or about September 8, 2008, Respondents
collected an advance fee totaling \$1,418 from Kathy Stubbs
pursùant to the provisions of a written agreement pertaining to
loan modification services to be provided by Respondents with
respect to a loan secured by the real property located at 3003
Airway Street, East Wenatchee, Washington 98802.

Respondents collected the advance fees described in Paragraph 6, above, pursuant to the provisions of a document entitled Loss Mitigation Submission Fee Agreement, which document constitutes an advance fee agreement within the meaning of Code Section 10085.

8.

7.

Respondents failed to submit the written agreements referred to in Paragraph 6, above, to the Commissioner ten days before using them in violation of Code Section 10085 and Regulation 2970.

9.

The conduct, acts and/or omissions of Respondents MDHT CORPORATION and DUNKELMAN, as set forth above, are cause for the suspension or revocation of the licenses and license rights of Respondent MDHT CORPORATION and Respondent DUNKELMAN pursuant to Code Sections 10085, 10177(d) and/or 10177(g).

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	SECOND CAUSE OF ACCUSATION
1	(Trust Account Violations)
2	10.
3	Complainant hereby incorporates by reference the
4	allegations set forth in Paragraphs 1 through 9, above.
5	11.
6	Respondents failed to deposit the advance fees
7	described in Paragraph 6, above, into a real estate broker trust
8	account in violation of Code Section 10146.
9 .	12.
10	The conduct, acts and/or omissions of Respondents MDHT
11	CORPORATION and DUNKELMAN, as set forth in Paragraph 11, above,
12	violate Code Section 10146, and are cause for the suspension or
14	revocation of the licenses and license rights of Respondents MDHT
15	CORPORATION and DUNKELMAN pursuant to Code Sections 10177(d)
16	and/or 10177(g).
17	
18	THIRD CAUSE OF ACCUSATION
19	(Unlicensed Activity)
20	13.
21	Complainant hereby incorporates by reference the
22	allegations set forth in Paragraphs 1 through 12, above.
23	14.
24	The activities described in Paragraph 6, above, require
25	a real estate license under Sections 10131(d) and 10131.2 of the
26	Code.
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Respondents violated Section 10137 of the Code by employing and/or compensating individuals who were not licensed as a real estate salesperson or as a broker to perform activities requiring a license as follows:

a. Respondents employed and/or compensated Joe Fields
7 and Bret Lyon to perform some or all of the services alleged in
8 Paragraph 6, subsection (a), above, though neither was licensed
9 as a real estate salesperson or broker.

¹⁰ b. Respondents employed and/or compensated Armando
 ¹¹ Ramirez to perform some or all of the services alleged in
 ¹² Paragraph 6, subsection (b), above, though he was not licensed as
 ¹³ a real estate salesperson or broker.

c. Respondents employed and/or compensated Carl Velasquez to perform some or all of the services alleged in Paragraph 6, subsection (c), above, though he was not licensed as a real estate salesperson or broker.

16.

The conduct, acts and/or omissions of Respondents MDHT 20 CORPORATION and DUNKELMAN, as set forth in Paragraph 15, above, 21 violate Code Section 10137, and are cause for the suspension or 22 revocation of the licenses and license rights of Respondents MDHT 23 24 CORPORATION and DUNKELMAN pursuant to Code Sections 10177(d) 25 and/or 10177(g). 26 111 27 111

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1	FOURTH CAUSE OF ACCUSATION (Use of Unauthorized Fictitious Business Name)
. 2	17.
3	Complainant hereby incorporates by reference the
4	allegations set forth in Paragraphs 1 through 16, above.
5	18.
6	On or about November 17, 2008, Respondent MDHT
7	CORPORATION filed an application for and was authorized by the
8	Department of Real Estate ("Department") to use the fictitious
9 10	business name "American Loan Help Center."
11	19.
12	At a time prior to November 17, 2008, Respondents acted
13	without Department authorization in using the fictitious business
14	name "American Loan Help Center" to engage in activities
15	requiring the issuance of a real estate license in violation of
16	the provisions of Section 10159.5 of the Code and Section 2731,
. 17	Title 10, Chapter 6, Code of Regulations ("Regulations").
18	20.
19	The conduct, acts and/or omissions of Respondents, as
20	set forth in Paragraph 19, above, violate Code Section 10159.5
21	and Section 2731 of the Regulations and are cause for the
22	suspension or revocation of the licenses and license rights of
23	Respondent pursuant to Code Section 10177(d) and/or 10177(g).
24 25	111
. 26	111
27	111.
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FIFTH CAUSE OF ACCUSATION (Branch Office Violation)

21.

Complainant hereby incorporates by reference the allegations set forth in Paragraphs 1 through 20, above.

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22.

Respondents engaged in a real estate brokerage business at 1135 E. Route 66, Suite 201, Glendora, California 91740, a location for which Respondents failed to apply for and procure from the Department an additional license for the branch office being maintained by them, in violation of Section 10163 of the Code.

23.

The conduct, acts and/or omissions of Respondents, as set forth in Paragraph 22, above, violate Code Section 10163 and are cause for the suspension or revocation of the licenses and license rights of Respondent pursuant to Code Section 10177(d) and/or 10177(g).

SIXTH CAUSE OF ACCUSATION (Failure to Supervise)

24.

Respondent DUNKELMAN ordered, caused, authorized or
 participated in the conduct of Respondent MDHT CORPORATION, as is
 alleged in this Accusation.

25.

The conduct, acts and/or omissions, of Respondent
 DUNKELMAN, in allowing Respondent MDHT CORPORATION to violate the

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Real Estate Law, as set forth above, constitutes a failure by 1 DUNKELMAN, as the officer designated by a corporate broker 2 licensee, to exercise the supervision and control over the 3 activities of MDHT CORPORATION, as required by Code Section 10159.2, and is cause to suspend or revoke the real estate 5 licenses and license rights of DUNKELMAN under Code Sections 6 10177(d), 10177(g) and/or 10177(h). 7

8 WHEREFORE, Complainant prays that a hearing be 9 conducted on the allegations of this Accusation and that upon 10 proof thereof, a decision be rendered imposing disciplinary 11 action against all the licenses and license rights of Respondent 12 MDHT CORPORATION, and Respondent CHARLES MIKE DUNKELMAN, 13 individually, and as designated broker-officer of Respondent MDHT 14 Corporation, under the Real Estate Law (Part 1 of Division 4 of 15 the Business and Professions Code), and for such other and 16 further relief as may be proper under other applicable provisions 17 of law: 18 Dated at Los Angeles, California 19

reciil Robin Trujillo

2009.

Deputy Real Estat Commissioner

MDHT CORPORATION cc: CHARLES MIKE DUNKELMAN Robin Trujillo Sacto.

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