

FILED

MAR 30 2011

DEPARTMENT OF REAL ESTATE
BY: *[Signature]*

ELLIOTT MAC LENNAN, SBN 66674
Department of Real Estate
320 West 4th Street, Ste. 350
Los Angeles, California 90013-1105

Telephone: (213) 576-6911 (direct)
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BEFORE THE DEPARTMENT OF REAL ESTATE

STATE OF CALIFORNIA

* * * * *

In the Matter of the Accusation of

No. H-37188 LA

COMMERICAL LENDING CAPITAL INC.;
and SCOTT HUGH OAKLEY, individually
and as designated officer of
Commercial Lending Capital Inc.,

A C C U S A T I O N

Respondents.

The Complainant, Joseph Aiu, a Deputy Real Estate
Commissioner of the State of California, for cause of Accusation
against COMMERICAL LENDING CAPITAL INC. and SCOTT HUGH OAKLEY,
individually and as designated officer of Commercial Lending
Capital Inc., alleges as follows:

1.

The Complainant, Joseph Aiu, acting in his official
capacity as a Deputy Real Estate Commissioner of the State of
California, makes this Accusation against COMMERICAL LENDING
CAPITAL INC. (CLCI) and SCOTT HUGH OAKLEY (OAKLEY).

2.

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

License Status

3.

A. At all times mentioned, CLCI and OAKLEY were licensed or had license rights issued by the Department of Real Estate (Department) as real estate brokers.

B. At all times material herein, CLCI was licensed by the Department as a corporate real estate broker by and through OAKLEY, pursuant to Code Sections 10211 and 10159.2 for supervising the activities requiring a real estate license conducted on behalf CLCI.

C. OAKLEY is the sole shareholder and officer of CLCI.

License Status

4.

At all times mentioned, in the City and County of Riverside, CLCI and OAKLEY acted as real estate brokers and conducted licensed activities within the meaning of Code Sections 10131(d) and 10131.2. Respondents CLCI and OAKLEY operated a commercial mortgage and loan brokerage engaging in activities with the public wherein lenders and borrowers were solicited for loans secured directly or collaterally by liens on real property, wherein such loans were arranged, negotiated, processed and consummated on behalf of others for compensation or in

1 expectation of compensation and for fees often collected in
2 advance as well as at the conclusion of transactions.

3 FIRST CAUSE OF ACCUSATION
4 (Commercial Mortgage Loan Broker Audit)

5 5.

6 On March 5, 2009, the Department completed an audit
7 examination of the books and records of CLCI pertaining to the
8 mortgage loan activities described in Paragraph 4, including
9 residential and commercial loans that require a real estate
10 license. The audit examination covered a period of time
11 beginning on January 01, 2007 to December 31, 2008. The audit
12 examination revealed violations of the Code and the Regulations
13 as set forth in the following paragraphs, and more fully
14 discussed in Audit Report SD 080026 and the exhibits and work
15 papers attached to said audit report.

16 Trust Account

17 6.

18 Trust account records were not provided for the audit.

19
20 Violations Of The Real Estate Law

21 7.

22 In the course of activities described in Paragraph 4
23 above, and during the examination period described in Paragraph
24 5, Respondents CLCI and OAKLEY, acted in violation of the Code
25 and the Regulations in that Respondents:

26 ///

1 (A) Failed to retain all records of CLCI's activity
2 during the audit period requiring a real estate broker license,
3 in violation of Code Section 10148; and

4 (B) Listed an address for CLCI that was not listed with
5 the Department as either a branch office or a mailing address of
6 CLCI in violation of Code Section 10162 and Regulation 2715.
7 CLCI listed 11870 Pierce Street, Suite 200, Riverside, CA 92505,
8 as its main office. On January 26, 2009, CLCI, the next business
9 day after notice, corrected this violation.

10 Disciplinary Statutes and Regulations

11 8.

12 The conduct of Respondents CLCI and OAKLEY described in
13 Paragraph 7, above, violated the Code and the Regulations as set
14 forth below:

15 PARAGRAPH

16 PROVISIONS VIOLATED

17 7(A)

Code Section 10148

18
19 7(B)

Code Section 10162 and Regulation
20 2715

21 The foregoing violations constitute cause for discipline of the
22 real estate license and license rights of CLCI and OAKLEY, under
23 the provisions of Code Sections 10177(d), for violation of the
24 Real Estate Law, and/or 10177(g), for negligence.
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1 SECOND CAUSE OF ACTION
2 (Commercial Mortgage Loan Broker Audit)

3 9.

4 On August 6, 2009, the Department completed an audit
5 examination of the books and records of CLCI pertaining to the
6 mortgage loan activities described in Paragraph 4 that require a
7 real estate license. The audit examination covered a period of
8 time beginning on January 01, 2007 to April 30, 2009. The audit
9 examination revealed violations of the Code and the Regulations
10 as set forth in the following paragraphs, and more fully
11 discussed in Audit Report SD 080049 and the exhibits and work
12 papers attached to said audit report.

13 Trust Account

14 10.

15 At all times mentioned, in connection with the
16 activities described in Paragraph 4, above, CLCI accepted or
17 received funds including funds in trust (hereinafter "trust
18 funds") from or on behalf of actual or prospective parties
19 including borrowers and lenders for commercial loan transactions
20 and thereafter made deposits and or disbursements of such funds.
21 From time to time herein mentioned during the audit period, said
22 trust funds were deposited and/or maintained by CLCI in the banks
23 listed below as follows:

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B/A 1

Bank: Union Bank of California

Bank Address: P.O. Box 512380
Los Angeles, CA 90051-0380

Account Name: Commercial Lending Capital Inc

Account No.: XXXXXX0812

Signatories: Scott Oakley (REB)

Signatures required: One (1).

Purpose: This bank account was maintained for the receipts and disbursements of trust funds (advance fees) received in connection with CLCI's commercial loan activity and CLCI's general business activities.

B/A 2

Bank: Union Bank of California

Bank Address: P.O. Box 512380
Los Angeles, CA 90051-0380

Account Name: Commercial Lending Capital Inc

Account No.: XXXXXXXX8370

Signatories: Scott Oakley (REB)

Signatures required: One (1).

Purpose: This bank account was maintained for the receipts and disbursements of trust funds (advance fees) received in connection with CLCI's commercial loan activity and CLCI's general business activities.

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B/A 3

Bank: Bank of America
Bank Address: P.O. Box 37176
San Francisco, CA 94137-0001
Account Name: Commercial Lending Capital Inc
Account No.: XXXXXXXX6646
Signatories: Scott Oakley (REB)
Signatures required: One (1).

Purpose: This bank account was maintained for the receipts and disbursements of trust funds (advance fees) received in connection with CLCI's commercial loan activity and CLCI's general business activities.

B/A 4

Bank: Premier Service Bank
Bank Address: 3637 Arlington Ave Suite B
Riverside, CA 92506
Account Name: Commercial Lending Capital Inc
Account No.: XXXXXXXX2937
Signatories: Scott Oakley (REB)
Signatures required: One (1).

Purpose: This bank account was maintained for the receipts and disbursements of trust funds (advance fees) received in connection with CLCI's commercial loan activity and CLCI's general business activities. According to Oakley, this account was closed in January 2009.

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1 B/A 5

2 Bank: Citibank

3 Bank Address: P.O. Box 26892
4 San Francisco, CA 94126-6892

5 Account Name: Commercial Lending Capital Inc

6 Account No.: XXXXXXXX5378

7 Signatories: Scott Oakley (REB)

8 Signatures required: One (1).

9 Purpose: This bank account was maintained for the receipts
10 and disbursements of trust funds (advance fees) received in
11 connection with CLCI's commercial loan activity and CLCI's
12 general business activities.

12 Violations Of The Real Estate Law

13 11.

14 In the course of activities described in Paragraphs 4
15 and 10, above, and during the examination period described in
16 Paragraph 9, Respondents CLCI and OAKLEY, acted in violation of
17 the Code and the Regulations in that Respondents:
18

19 (A) (1) Permitted, allowed or caused the disbursement of
20 trust funds from B/A #1 and B/A #2 trust accounts, where the
21 disbursement of funds reduced the total of aggregate funds in
22 said trust accounts, to an amount which, on April 30, 2009, was
23 \$88,566.94, less than the existing aggregate trust fund liability
24 of CLCI to every principal who was an owner of said funds,
25 without first obtaining the prior written consent of the owners
26 of said funds, in violation of Code Sections 10145, 10176(i)
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1 and/or 10177(g) and Regulation 2832.1. The shortage was due to
2 conversion of trust funds; and

3 (A) (2) Permitted, allowed or caused the disbursement of
4 trust funds from B/A #3 trust account, where the disbursement of
5 funds reduced the total of aggregate funds in B/A #3, to an
6 amount which, on April 30, 2009, was \$65,825.72, less than the
7 existing aggregate trust fund liability of CLCI to every
8 principal who was an owner of said funds, without first obtaining
9 the prior written consent of the owners of said funds, in
10 violation of Code Sections 10145, 10176(i) and/or 10177(g) and
11 Regulation 2832.1. This shortage was also due to conversion of
12 trust funds;

13 (A) (3) Permitted, allowed or caused the disbursement of
14 trust funds from B/A #4 trust account, where the disbursement of
15 funds reduced the total of aggregate funds in B/A #4, to an
16 amount which, on January 31, 2009, was \$103,950.00, less than the
17 existing aggregate trust fund liability of CLCI to every
18 principal who was an owner of said funds, without first obtaining
19 the prior written consent of the owners of said funds, in
20 violation of Code Sections 10145, 10176(i) and/or 10177(g) and
21 Regulation 2832.1. This shortage was also due to conversion of
22 trust funds;

24 (B) (1) An audit examination and investigation
25 determined that Respondents CLCI and OAKLEY engaged in the
26 business of a commercial loan and advance fee brokerage requiring
27

1 a real estate license to operate, within the definition of Code
2 Sections 10131(d) and 10131.2. During the audit period and
3 thereafter to date, Respondents solicited borrowers seeking
4 commercial loans for which Respondents charged and collected
5 advance fees, in violation of Code Sections 10085, 10145, 10146
6 and Regulations 2970 and 2972, including but not limited to the
7 below-tabled borrowers, and for violation of Code Sections
8 10176(i) and 10177(g), for failure to return advance fees to said
9 borrowers;

11 Table: Advance Fees Collected for Commercial Loan Services

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Borrower	Date	Advance Fee
Brent Crowther	Audit Period	\$4,500 to \$6,400
Rosacruz Falla	Audit Period	\$4,500 to \$6,400
Maurice Ferris	Audit Period	\$4,500 to \$6,400
Chan Sue Kim	Audit Period	\$4,500 to \$6,400
Vincente Solorios	Audit Period	\$4,500 to \$6,400
Di Bernardino/God	October 22, 2008	\$20,000
Albert Aldrich	Audit Period	\$4,500 to \$6,400
Robert Newman	Audit Period	\$4,500 to \$6,400
Gary Guarino	Audit Period	\$4,500 to \$6,400
Adeteju Olukun	Audit Period	\$4,500 to \$6,400

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1 (C) Failed to maintain an accurate and complete control
2 record for each beneficiary or transaction, thereby failing to
3 account for all trust funds received, deposited and disbursed by
4 B/A #1 - B/A #5, during the period from January 2009 to April
5 2009, in violation of Code Section 10145 and Regulation 2831;

6 (D) Failed to maintain an accurate and complete
7 separate record for each beneficiary or transaction, thereby
8 failing to account for all trust funds received, deposited and
9 disbursed by B/A #1 - B/A #5, during the period from January 2009
10 to April 2009, in violation of Code Section 10145 and Regulation
11 2831.1.
12

13 (E) Failed to perform a monthly reconciliation of the
14 balance of all separate beneficiary or transaction records
15 maintained pursuant to Regulation 2831.1 with the record of all
16 trust funds received and disbursed by B/A #1 - B/A #5, during the
17 period from January 2009 to April 2009, in violation of Code
18 Section 10145 and Regulation 2831.2;

19 (F) B/A #1 - B/A #5 were not in the name of the broker
20 as trustee at a bank or other financial institution, nor
21 designated as trust accounts, in violation of Code Section 10145
22 of the Code and Regulation 2832(a);

23 (G) Failed to deposit advance fees collected from
24 borrowers for commercial loans brokered. Errantly, advance fees
25 were deposited into CLCI's general operating account, violation
26 of Code Section 10146 and Regulation 2972;
27

1 (H) Mixed and commingled trust funds and personal funds
2 by depositing advance fees received from borrowers for commercial
3 loans brokered into CLCI's general operating account, in
4 violation of Code Section 10176(e);

5 (I) Failed to submit to the Commissioner not less than
6 ten calendar days before publication or other use, all materials
7 to be used in advertising, promoting, soliciting and negotiating
8 an agreement calling for the payment of an advance fee, in
9 violation of Code Section 10085 and Regulation 2970;

10 (J) Failed to provide a complete description of
11 services to be rendered provided to each homeowner-borrower in 10
12 point type font and, an allocation and disbursement of the amount
13 collected as the advance fee for each commercial loan serviced,
14 violation of Code Section 10146 and Regulation 2972;

15 (K) Failed to retain a true and correct copy of a
16 Department of Real Estate approved Mortgage Loan Disclosure
17 Statement signed by the broker for borrowers Leroy Grove, Cecilio
18 Rodriguez, David Cardenas, Datta Vikram, Henry Co, Kathleen
19 Ucinski, Byron Vasquez and Arturo Villasensor, in violation of
20 Code Section 10240 and Regulation 2840;

21 (L) Employed and compensated Nicole Ferguson, Angel
22 Couch, Laurie Duenas and Gwyn Kerr, as commercial loan agents who
23 Respondents knew were not licensed by the Department as real
24 estate brokers or as a real estate salespersons employed by a
25 real estate broker, for performing acts for which a real estate
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1 license is required, including soliciting mortgage loans, in
2 violation of Code Section 10137.

3 (M) Listed an address for CLCI's escrow division that
4 was not listed with the Department as either a branch office or a
5 mailing address of CLCI in violation of Code Section 10162 and
6 Regulation 2715. As aforesaid in Paragraph 7(B) above, and
7 repeated herein, CLCI listed 11870 Pierce Street, Suite 200,
8 Riverside, CA 92505, as its main office. On January 26, 2009,
9 CLCI, the next business day after notice, corrected this
10 violation; and

11 (N) The conduct of Respondent OAKLEY constitutes a
12 failure on Respondent's part, as officer designated by a
13 corporate broker licensee, to exercise the reasonable supervision
14 and control over the licensed activities of CLCI, as required by
15 Code Section 10159.2, and to keep UHI in compliance with the Real
16 Estate Law, with specific regard to the brokering of commercial
17 loan and advance fee handling and collection, requiring a real
18 estate license, in violation of Code Sections 10159.2, 10177(h)
19 and 2725. OAKLEY had no system in place for regularly monitoring
20 MANNING's compliance with the Real Estate Law especially in
21 regard to establishing, systems, policies and procedures to
22 review trust fund handling and advance fee solicitation, handling
23 and collection, in violation of Code Section 10177(h) and
24 Regulation 2725. OAKLEY failed to appropriate policies, rules or
25 procedures in place to review, oversee, inspect and manage and
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1 especially to prevent the deposit of trust funds into OAKLEY's
2 general operating accounts which were not designated as trust
3 accounts, or to maintain any trust fund handling records, in the
4 form of advance fees, which were improperly deposited into a
5 general bank account.

6 Disciplinary Statutes and Regulations

7 12.

8 The conduct of Respondents CLCI and OAKLEY described in
9 Paragraph 11, above, violated the Code and the Regulations as set
10 forth below:

11 PARAGRAPH

PROVISIONS VIOLATED

12 11(A)

Code Sections 10145, 10176(i)
13 and/or 10177(g) and Regulation
14 2832.1

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16
17 11(B)

Code Sections 10085, 10145, 10146,
18 10176(i) and 10177(g) and
19 Regulations 2970 and 2972

20
21 11(C)

Code Section 10145 and Regulation
22 2831

23
24 11(D)

Code Section 10145 and Regulation
25 2831.1
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1	11(E)	Code Section 10145 and Regulation
2		2831.2
3		
4	11(F)	Code Section 10145 and Regulation
5		2832(a)
6		
7	11(G)	Code Section 10146 and Regulation
8		and 2972(a)
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10	11(H)	Code Sections 10145 and 10176(e)
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12		
13	11(I)	Code Section 10085 and Regulation
14		2970
15		
16	11(J)	Code Section 10146 and Regulation
17		2972
18		
19	11(K)	Code Section 10240 and Regulation
20		2840
21		
22	11(L)	Code Section 10137
23		
24		
25	11(M)	Code Section 10162 and Regulation
26		2715
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2 11(N)

Code Sections 10159.2 and 10177(h)
and Regulation 2725
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4 The foregoing violations constitute cause for discipline of the
5 real estate license and license rights of CLCI and OAKLEY, under
6 the provisions of Code Sections 10176(e), for commingling
7 10176(i), for fraud and dishonest dealing including conversion of
8 trust funds, 10177(d) for violation of the Real Estate Law,
9 and/or 10177(g), for negligence.
10

11 SECOND CAUSE OF ACCUSATION
(Fraud in a Civil Action)
12 (Business And Professions Code 10177.5)

13 13.

14 On or about January 5, 2011 in the Superior Court of
15 the State of California, for the County of Riverside, in Case No.
16 RIC10009032, La Casa Anaheim Resort, LLC, vs. Commercial Lending
17 Capital, Inc., et al a Judgment Confirming Award of Arbitrator
18 was entered against Respondent CLCI inter alia based on grounds
19 of fraud, misrepresentation or deceit with reference to a
20 transaction for which a real estate license is required, in the
21 amount of \$318,000.
22

23 14.

24 The facts set forth in Paragraph 13, above, constitute
25 cause under Code Sections 10177.5, 10176(a), 10176(b), 10176(i)
26 of the Code for discipline of the license and license rights of
27 Respondents CLCI and OAKLEY under the Real Estate Law, and under

1 Code Sections 10176(i) and/or 10177(g).

2 THIRD CAUSE OF ACCUSATION
3 (Bait and Switch Tactics for Fraudulent Commercial Lending)

4 General Allegations

5 15.

6 From January 1, 2007 and continuing thereafter to date,
7 Respondents CLCI and OAKLEY solicited individual borrowers and
8 solicited real estate brokers with a view toward obtaining
9 referrals for loans from the brokers clientele.

10 Specific Allegations

11 16.

12 CLCI fraudulently emphasized that CLCI was a wholesale
13 lender using CLCI's own funds to directly fund loans to real
14 estate brokers applying to CLCI seeking loans for borrowers.
15 Respondents represented to individuals and to brokers that CLCI
16 would directly fund commercial mortgage loans for the broker's
17 clients. CLCI did not represent to said brokers that it brokered
18 loans. In truth and in fact, CLCI did not fund any direct loans
19 and did not have a 'correspondent' direct lender.

20 17.

21 As one on the goals of its fraudulent direct lending
22 scheme, CLCI and OAKLEY required both brokers and individuals to
23 pay an advance fee in order to obtain loans without first having
24 an approved advance fee from the Department.
25

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2 18.

3 CLCI and OAKLEY perpetuated and operated its fraudulent
4 scheme by way of unlicensed loan agents and salespersons.

5 Violations and Disciplinary Statutes and Regulations

6 19.

7 The conduct of Respondents CLCI and OAKLEY described in
8 Paragraphs 15 through 18, above, violated the Code and the
9 Regulations as set forth below:

10 A. 10176(a) for substantial misrepresentation

11 B. 10176(b) for making false promises of a character
12 likely to influence, persuade or induce individual borrowers and
13 referring real estate brokers apply for a direct loan.

14 C. For 10176(c) for a continued and flagrant course of
15 misrepresentations and/or false promises through real estate
16 agents or salespersons.

17 D. 10176(i) for fraud and dishonest dealing in
18 connection with an ongoing predatory lending scheme involving
19 bait and switch tactics.

20 E. Code Section 10177(d) for violation of the Real
21 Estate Law.

22 F. Code Section 10137 for employing and/or compensating
23 unlicensed loan agents and/or licensed real estate salespersons
24 that were non broker affiliated including, but not limited to
25 Clinton Earl Davis, Bill Jordan, La Toya Haynes, Luis Lugo, Angel
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Couch, Nicole Ferguson, Lauri Duens, Gwyn Kerr and Rene Bernal.

G. 10177(g) for negligence in connection with an ongoing predatory lending scheme.

FOURTH CAUSE OF ACCUSATION
(Advance Fee Brokerage Violations)

General Allegation

20.

At all times mentioned herein, Respondents CLCI and OAKLEY engaged in the business of an advance fee brokerage, within the definition of Code Sections 10131(d) and 10131.2.

Specific Allegation

21.

Respondents CLCI and OAKLEY charged and collected advance fees for obtaining loans brokered by CLCI, for the borrowers tabled below:

Table: Advance Fees Collected to Obtain Commercial Loans

Borrower	Date	Solicited Broker	Advance Fee
Eustacio Guerrero	09-14-07 to 12-05-09	Tony Acosta V&A Mortgage	\$6,150
Ade Oluokun	12-13-07 to 03-11-09	Marc Lifebin Hilltop Consulting	\$5,100
Armando Hurtado	04-10-08 to	CLCI/Rene Bernal	\$6,800

	05-21-08	Luis Lugo	
Newman/ Guarino	05-16-08 to 05-28-09	Pablo Oliva/New Age Home Mortgage	\$6,100
Jose Gomez	03-04-08 to 03-11-08	Martha Carrasco/ Century 21\ La Hacienda	\$5,800
Di Bernardo	07-26-08 to 08-11-09	F. Gelsomino Pfd. Lenders Corp	\$20,000
Mark Horn	11-07-08 to 11-24-08	Eric Scroggins Broker	\$6,800
Constance Ng	11-07-08 to 11-24-08	David Daniel	\$7,565
Fely Macalad	03-04-08 to 03-11-08	Dan Fisher	\$9,875

22.

In the course of activities described in Paragraphs and 20 and 21, above, and during the examination period described in Paragraph 5, Respondents CLCI and OAKLEY acted in violation of the Code and the Regulations in which Respondents:

(A) Collected advance fees within the meaning of Code Section 10026 from homeowners seeking commercial loan wherein CLCI, did not have and thus failed to provide a pre-approved advance fee agreement from the Department, in violation of Code Section 10085 and Regulation 2970, for the tabled borrowers.

1 (B) CLCI failed to provide a complete description of
2 services to be rendered provided to each prospective tenant in 10
3 point type font and failed to provide an allocation and
4 disbursement of the amount collected as the advance fees from the
5 tabled borrowers, in violation of Code Section 10146 and
6 Regulation 2972.

7 (C) Mixed and commingled trust funds and personal funds
8 by depositing advance fees collected into, CLCI's non trust fund
9 general operating account, in violation of Code Sections 10145
10 and 10176(e) and Regulation 2832.

11 The foregoing violations constitutes cause for
12 discipline of the real estate license and license rights of CLCI
13 and OAKLEY, as aforesaid, under the provisions of Code Sections
14 10176(e) for commingling, 10177(d) for violation of the Real
15 Estate Law and/or 10177(g) for negligence.

16 FIFTH CAUSE OF ACCUSATION
17 (Negligence)

18 23.

19 The overall conduct of Respondents CLCI and OAKLEY
20 constitutes negligence or incompetence. This conduct and
21 violation are cause for discipline of the real estate license and
22 license rights of Respondents CLCI and OAKLEY pursuant to Code
23 Section 10177(g).

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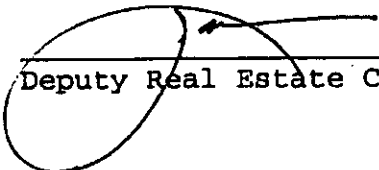
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1 WHEREFORE, Complainant prays that a hearing be
2 conducted on the allegations of this Accusation and that upon
3 proof thereof, a decision be rendered imposing disciplinary
4 action against the license and license rights of Respondents
5 COMMERICAL LENDING CAPITAL INC. and SCOTT HUGH OAKLEY, under the
6 Real Estate Law (Part 1 of Division 4 of the Business and
7 Professions Code) and for such other and further relief as may be
8 proper under other applicable provisions of law including but not
9 limited to restorral of trust fund shortages, payment of
10 arbitration award, restitution and costs of audits.

11 Dated at Los Angeles, California

12 this *30 March 2011*

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14 Deputy Real Estate Commissioner
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24 cc: Commercial Lending Capital Inc.
25 c/o Scott Hugh Oakley D.O.
26 Joseph Aiu
27 Sacto
Enforcement - Kathryn Stanbra
Audits - Zaky Wanis