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FILED

MAY 29 2015

BUREAU OF REAL ESTATE

By *Erin Neman*

8 BEFORE THE BUREAU OF REAL ESTATE

9 STATE OF CALIFORNIA

10 * * *

11 In the Matter of the Accusation of)

No. H-39853 LA

12)

A C C U S A T I O N

13 PRIME MANAGEMENT)

14 GROUP, INC.)

15 and DANIEL FLORES)

16 individually and as)

17 designated officer of)

18 Prime Management)

19 Group, Inc.)

20 Respondents,)

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24)

21 The Complainant, Maria Suarez, a Deputy Real Estate
22 Commissioner of the State of California, for cause of accusation
23 against PRIME MANAGEMENT GROUP, INC., and DANIEL FLORES
24 individually and as designated officer of Prime Management Group,
25 Inc., alleges as follows:

26 Accusation of Prime Management Group, Inc.

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1 1. The Complainant, Maria Suarez, acting in her
2 official capacity as a Deputy Real Estate Commissioner of the
3 State of California, makes this Accusation against PRIME
4 MANAGEMENT GROUP, INC., and DANIEL FLORES.

5 2. PRIME MANAGEMENT GROUP, INC., and DANIEL FLORES
6 individually and as designated officer of Prime Management Group,
7 Inc. (hereinafter referred to as "Respondents") are presently
8 licensed and/or have license rights under the Real Estate Law
9 (Part 1 of Division 4 of the Business and Professions Code,
10 hereinafter Code).

11 3. At all times herein mentioned, Respondents PRIME
12 MANAGEMENT GROUP, INC., and DANIEL FLORES were licensed as real
13 estate brokers. Respondent FLORES was the designated officer and
14 pursuant to Code Section 10159.2 was responsible for the
15 supervision and control of the activities conducted on behalf of
16 the corporation by its officers and employees as necessary to
17 secure full compliance with the provisions of the real estate law
18 including supervision of salespersons licensed to the corporation
19 in the performance of acts for which a real estate license is
20 required.

21 4. At all times material herein, Respondents engaged
22 in the business of, acted in the capacity of, advertised or
23 assumed to act as real estate brokers in the State of California
24 within the meaning of Section 10131(b) of the Code including
25 soliciting owners and renters, negotiating the lease and rental
26 of real property, and collecting rents from real property.

27 Accusation of Prime Management Group, Inc.

1 5. On or about March 24, 2015, the Bureau completed an
2 examination of Respondent PRIME MANAGEMENT GROUP, INC.'s books
3 and records, pertaining to the activities described in Paragraph
4 4 above, covering a period from February 1, 2012, through
5 September 30, 2014, which examination revealed violations of the
6 Code and of Title 10, Chapter 6, California Code of Regulations
7 (hereinafter Regulations) as set forth below.

8 6. The examination described in Paragraph 5, above,
9 determined that, in connection with the activities described in
10 Paragraph 4 above, Respondents accepted or received funds,
11 including funds in trust (hereinafter "trust funds") from or on
12 behalf of principals, and thereafter made deposit or disbursement
13 of such funds.

14 7. In the course of activities described in Paragraphs
15 4 through 6 and during the examination period described in
16 Paragraph 5, Respondents PRIME MANAGEMENT GROUP, INC., and DANIEL
17 FLORES acted in violation of the Code and the Regulations as
18 follows, and as more specifically set forth in Audit Report No.
19 LA 140070 and related exhibits:

20 a. Violated Code Section 10145 and Regulation 2832.1
21 by maintaining as of September 30, 2014 a trust account shortage
22 of \$17,876.49.

23 b. Violated Code Section 10145 and Regulation 2831 by
24 failing to maintain a control record that was accurate and
25 complete for each trust account. There was an unidentified
26 shortage of \$7,178.07 in the trust accounts.

27 The Accusation of Prime Management Group, Inc.

1 c. Violated Code Section 10145 and Regulation 2831.2
2 by not maintaining complete and accurate monthly reconciliations
3 of all the separate records to the control record.

4 d. Violated Code Section 10161.8 and Regulation 2752
5 by failing to notify the Bureau timely of the employment of
6 Albert P.

7 e. Violated Regulation 2725 by failing to establish
8 policies, rules, procedures and systems to review, oversee and
9 inspect the handling of trust funds by licensees and employees.

10 8. The conduct, acts and/or omissions of Respondents
11 PRIME MANAGEMENT GROUP, INC., and DANIEL FLORES, as alleged
12 above, subjects their real estate licenses and license rights to
13 suspension or revocation pursuant to Sections 10177(d) and
14 10177(g) of the Code.

15
16 FAILURE TO SUPERVISE

17 9. The conduct, acts and/or omissions of Respondent
18 FLORES, in failing to ensure full compliance with the Real Estate
19 Law is in violation of Code Section 10159.2 and subjects his real
20 estate licenses and license rights to suspension or revocation
21 pursuant to Sections 10177(d), 10177(g), and 10177(h) of the
22 Code.

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26 The Accusation of Prime Management Group, Inc.

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COST RECOVERY

Code Section 10106 provides, in pertinent part, that in any order issued in resolution of a disciplinary proceeding before the bureau, the commissioner may request the administrative law judge to direct a licensee found to have committed a violation of this part to pay a sum not to exceed the reasonable costs of the investigation and enforcement of the case.

WHEREFORE, Complainant prays that a hearing be conducted on the allegations of this Accusation and that upon proof thereof, a decision be rendered imposing disciplinary action against all licenses and license rights of Respondents PRIME MANAGEMENT GROUP, INC., and DANIEL FLORES individually and as designated officer of Prime Management Group, Inc. under the Real Estate Law (Part 1 of Division 4 of the Business and Professions Code), for the cost of investigation and enforcement as permitted by law, and for such other and further relief as may be proper under other applicable provisions of law.

Dated at Los Angeles, California
this 22nd day of May, 2015.


MARIA SUAREZ
Deputy Real Estate Commissioner

cc: Prime Management Group, Inc.
Daniel Flores
Maria Flores
Sacto.

Accusation of Prime Management Group, Inc.