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FILED

AUG 09 2017

BUREAU OF REAL ESTATE

By *Sigrid Kerner*

8 BEFORE THE BUREAU OF REAL ESTATE
9 DEPARTMENT OF CONSUMER AFFAIRS
10 STATE OF CALIFORNIA

| | | |
|--|---|-----------------------|
| 11 In the Matter of the Accusation against |) | CalBRE No. H-40636 LA |
| |) | OAH No. 2017060727 |
| 12 COLBY SEONGWU JO, doing business as |) | |
| 13 Omni Property Management Co. and |) | <u>FIRST AMENDED</u> |
| 14 Omni Realty & Investment Group Co., |) | <u>ACCUSATION</u> |
| |) | |
| 15 Respondent. |) | |
| |) | |
| 16 |) | |

17 This First Amended Accusation amends the Accusation filed on May 17, 2017. The
18 Complainant, Maria Suarez, a Supervising Special Investigator for the Bureau of Real Estate
19 (“Bureau”) of the State of California, for cause of Accusation against COLBY SEONGWU JO,
20 doing business as Omni Property Management Co. and Omni Realty & Investment Group Co.,
21 (“Respondent”), alleges as follows:

22 1.

23 The Complainant, Maria Suarez, acting in her official capacity as a Supervising Special
24 Investigator, makes this Accusation against Respondent.

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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.

Licenses

3.

Respondent is presently licensed and/or have license rights under the Real Estate Law (Part 1 of Division 4 of the Code).

4.

From November 10, 2004 through the present, Respondent COLBY SEONGWU JO ("JO"), formerly known as Seongwu Jo, has been licensed by the Bureau as a real estate broker, License ID 01299519. As of April 24, 2006, Respondent JO has been licensed by the Bureau to do business as "Omni Property Management Co" and "Omni Realty & Investment Group Co."

5.

From May 19, 2009 through August 7, 2017, Seong Kon Kong ("Kong") was licensed by the Bureau as a real estate salesperson, License ID 01861311. On August 7, 2017, Kong's license was revoked by default decision in Bureau Case No. H-40636 LA.

6.

From August 21, 2014 through August 23, 2016, Kong was licensed under the employment of Respondent JO. On or about August 24, 2016, the Bureau was informed of Kong's discontinued employment under Respondent JO.

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1 Facts

2 7.

3 In or around September of 2014, Bethesda University ("BU") hired Kong to act as BU's
4 property manager for approximately 11 properties that are owned by BU and located in
5 Southern California. Kong solicited listings for and negotiated the lease of several BU rental
6 properties. On or about September 11, 2014, Kong executed a residential lease or month-to-
7 month rental agreement for a BU property with tenant, a LLC.¹ The rental agreement
8 misrepresented the true identity of the owner by listing Kong as the landlord and property
9 owner for a BU property located at 5807 Monterey Road, in Los Angeles, California.

10 8.

11 From on or about December 26, 2014 through January 31, 2015, Kong negotiated
12 several residential lease or month-to-month rental agreements for BU properties. The rental
13 agreements listed Kong and Omni Realty and Investment Group Co. as both the real estate
14 listing and leasing broker. Some of the rental agreements misrepresented the true identity of the
15 listing and leasing broker by also listing Keystone Investment, Inc. (CalBRE License No.
16 01155139) as a broker on the agreements. Copies of some of the rental agreements provided to
17 BU were not signed by Kong and did not list to whom the rent payments were to be made.

18 9.

19 Kong collected trust funds (including security deposits and rent payments) from tenants
20 of BU's rental properties. Kong instructed the tenants to make the rent payments payable
21 directly to Kong. Kong failed to deliver the trust funds to BU.

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24 ¹ Initials are used in place of individuals' full names to protect their privacy. Documents containing individuals' full names will be provided during the discovery phase of this case to Respondent(s) and/or their attorneys, after service of a timely and proper request for discovery on Complainant's counsel.

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10.

On or about February 16, 2016, BU filed a complaint with the Bureau against Kong. BU's complaint alleged that Kong had embezzled over \$100,000 from BU by failing to deliver trust funds including rents and security deposits to BU.

CAUSE OF ACCUSATION

Audit LA 160031

11.

On December 28, 2016, the Bureau completed an examination of the books and records of Respondent JO's real estate activities which require a real estate license pursuant to Code section 10131. The audit examination covered a period of time from July 1, 2014 through August 31, 2016. The audit examination revealed violations of the Code and the Regulations as set forth in the following paragraphs, and more fully discussed in Audit Report LA 160031 and the exhibits and work papers attached to said audit report.

12.

An entrance interview was held on September 27, 2016 with Respondent JO. The Bureau's auditor requested the books and records to examine JO's real estate sales activities and Kong's property management activities.

13.

Respondent JO claimed that he did not maintain any trust account for his real estate activities during the audit period.

14.

On September 27, 2016, Respondent JO submitted a written statement to the Bureau's auditor regarding his broker relationship with Kong. Respondent JO stated that Kong claimed to want to work as a commercial real estate agent and had sold a property for BU on December 16,

1 2014. Respondent JO believed BU was Kong's only client. JO denied having any knowledge of
2 Kong's property management activities for BU and claimed that he [JO] had not had any contact
3 with Kong since April of 2015.

4 15.

5 On November 28, 2016, in a written response to a subpoena for records from the Bureau
6 to JO, Respondent JO claimed that he and his company stopped engaging in property
7 management activities as of April 11, 2014, when their last client sold their property.

8 16.

9 Respondent JO maintained the following general bank account for his real estate
10 activities during the audit period:

11 General Bank Account #1 (G/A1)

12 Bank: Pacific City Bank

13 Account Name: Colby Seongwu Jo dba Omni Realty & Investment Grou Co. Omni
14 Property Management Co.

15 Account #: xxxxx7261

16 Signer(s): Respondent JO

17 Description: According to Respondent JO, G/A 1 was used as a business operating
18 account for JO's real estate sales activities.

19 Violations

20 17.

21 In the course of Respondent JO's real estate activities during the audit examination
22 period described above in Paragraph 11, the following violations of the Code and the
23 Regulations were found:

24

1 17(a). Issues One(a) and One(b). Trust account balance and accountability. Real estate
2 sales activities

3 Respondent JO claimed that he did not maintain a trust account for his real estate sales
4 activities during the audit period. Kong collected approximately \$109,343.55 in trust funds from
5 BU tenants while licensed under the employment of Respondent JO. The Bureau's auditor was
6 not able to determine how trust funds were handled since the books and records related to the
7 property management activities conducted by KONG were not made available for examination
8 for the audit.

9 17(b). Issue Two. Code sections 10130 and 10145(c). Real estate property management
10 activities by Kong for BU rental properties

11 Based on the records provided to the Bureau, during the audit period, JO's licensed
12 salesperson (Kong) managed and collected rents for eleven (11) properties owned by BU from
13 on or around 2014 through 2016. Rent checks were issued directly to Kong and the trust funds
14 were never received by BU. During the period that Kong was licensed under JO (August 21,
15 2014 through August 23, 2016), there were seven (7) lease agreements signed by M.H.K. as
16 C.F.O. of BU, two (2) lease agreements signed by Kong, and copies of trust fund checks payable
17 to and endorsed by Kong for BU's eleven rental properties. Kong collected at least \$109,143.55
18 from BU's tenants while licensed under the employment of JO. Kong cashed the trust fund
19 check payments of at least \$60,343.55 for cash through at least two (2) check cashing businesses:
20 Angel Enterprises, Inc. and Ardmore Liquor. The check cashing businesses then deposited the
21 trust fund checks into their own business bank accounts. The books and records related to the
22 property management activities by Kong during the audit period were not made available to the
23 Bureau's auditor. The foregoing acts and conduct by Kong are in violation of Code sections
24 10130 and 10145.

1 17(b). Issue Three. Code sections 10130 and 10145(c). License required/Handling of
2 Trust Funds

3 According to Respondent JO, Kong conducted property management activities for BU
4 without JO's knowledge. Kong conducted property management activities, entered into
5 residential lease agreements with tenants, collected trust funds on behalf of BU, and failed to
6 immediately deliver the funds to his employing broker (JO), and also failed to deposit the trust
7 funds into his broker's trust fund account. Kong acted in the capacity of a real estate broker
8 during the audit period, while he was licensed only as a salesperson under the employment of
9 Respondent JO. The foregoing acts and conduct by Kong are in violation of Code sections
10 10130 and 10145(c).

11 17(c). Issue Four. Code Section 10145(a) and Regulation 2832. Handling of Trust
12 Funds/Trust Fund Account

13 According to Respondent JO, Kong conducted property management activities for BU
14 without JO's knowledge. During the audit period, Kong collected trust funds of at least
15 \$109,143.55 from BU's tenants and failed to immediately deliver the funds to his employing
16 broker (JO), and also failed to deposit the trust funds into his broker's trust fund account. In
17 addition, JO failed to maintain a trust account for trust funds collected by his salesperson (Kong)
18 on behalf of BU. Said trust funds were not deposited into a trust account. Said acts are in
19 violation of Code section 10145(a) and Regulation 2832.

20 17(d). Issue Five. Code Section 10145 and Regulation 2831. Trust Fund Records to be
21 maintained

22 During the audit period, Kong failed to maintain a columnar record of trust funds
23 received and disbursed for trust funds collected from BU's tenants, in violation of Code section
24 10145 and Regulation 2831.

1 violation of Code sections 10145, 10148, 10159.5 and Regulations 2725 and 2731.

2 Audit Costs

3 19.

4 Code Section 10148(b) provides, in pertinent part, that the Commissioner shall charge a
5 real estate broker for the cost of any audit, if the Commissioner has found in a final decision
6 following a disciplinary hearing that the broker has violated Code section 10145 or a regulation
7 or rule of the Commissioner interpreting said section.

8 Investigation/Enforcement Costs

9 20.

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

14 STATUTORY PROVISIONS

15 21.

16 Code section 10130 provides:

17 "It is unlawful for any person to engage in the business of, act in the
18 capacity of, advertise as, or assume to act as a real estate broker or a real estate
19 salesperson within this state without first obtaining a real estate license from the
20 department, or to engage in the business of, act in the capacity of, advertise as, or
21 assume to act as a mortgage loan originator within this state without having
22 obtained a license endorsement. The commissioner may prefer a complaint for
violation of this section before any court of competent jurisdiction, and the
commissioner and his or her counsel, deputies, or assistants may assist in
presenting the law or facts at the trial. It is the duty of the district attorney of each
county in this state to prosecute all violations of this section in their respective
counties in which the violations occur."

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22.

Code section 10131 provides:

“A real estate broker within the meaning of this part is a person who, for a compensation or in expectation of a compensation, regardless of the form or time of payment, does or negotiates to do one or more of the following acts for another or others:

(a) Sells or offers to sell, buys or offers to buy, solicits prospective sellers or purchasers of, solicits or obtains listings of, or negotiates the purchase, sale or exchange of real property or a business opportunity.

(b) Leases or rents or offers to lease or rent, or places for rent, or solicits listings of places for rent, or solicits for prospective tenants, or negotiates the sale, purchase or exchanges of leases on real property, or on a business opportunity, or collects rents from real property, or improvements thereon, or from business opportunities.

(c) Assists or offers to assist in filing an application for the purchase or lease of, or in locating or entering upon, lands owned by the state or federal government.

(d) Solicits borrowers or lenders for or negotiates loans or collects payments or performs services for borrowers or lenders or note owners in connection with loans secured directly or collaterally by liens on real property or on a business opportunity.

(e) Sells or offers to sell, buys or offers to buy, or exchanges or offers to exchange a real property sales contract, or a promissory note secured directly or collaterally by a lien on real property or on a business opportunity, and performs services for the holders thereof.”

23.

Code section 10132 provides:

“A real estate salesman within the meaning of this part is a natural person who, for a compensation or in expectation of a compensation, is employed by a licensed real estate broker to do one or more of the acts set forth in Sections 10131, 10131.1, 10131.2, 10131.3, 10131.4, and 10131.6.”

24.

Code section 10159.5 provides:

“(a) (1) Every person applying for a license under this chapter who desires to have the license issued under a fictitious business name shall file with his or her application a certified copy of his or her fictitious business name statement filed with the county clerk pursuant to Chapter 5 (commencing with Section 17900) of Part 3 of Division 7.

1 (2) A responsible broker may, by contract, permit a salesperson to do all
of the following:

2 (A) File an application on behalf of a responsible broker with a county
clerk to obtain a fictitious business name.

3 (B) Deliver to the bureau an application, signed by the responsible broker,
requesting the bureau's approval to use a county approved fictitious business
4 name that shall be identified with the responsible broker's license number.

5 (C) Pay for any fees associated with filing an application with a county or
the bureau to obtain or use a fictitious business name.

6 (D) Maintain ownership of a fictitious business name, as defined in
paragraph (2) of subdivision (a) of Section 10159.7, that may be used subject to
the control of the responsible broker.

7 (b) (1) A salesperson using a fictitious business name authorized by
subdivision (a), shall use that name only as permitted by his or her responsible
8 broker.

9 (2) This section does not change a real estate broker's duties under this
division to supervise a salesperson.

10 (c) A person applying to a county for a fictitious business name pursuant
to subdivision (a) may file his or her application in the county or counties where
the fictitious business name will be used.

11 (d) Advertising and solicitation materials, including business cards, print
or electronic media and "for sale" signage, using a fictitious business name
12 obtained in accordance with paragraph (2) of subdivision (a) shall include the
responsible broker's identity, as defined in paragraph (1) of subdivision (a) of
13 Section 10159.7, in a manner equally as prominent as the fictitious business
name.

14 (e) Notwithstanding subdivision (b) of Section 10140.6, advertising and
solicitation materials, including print or electronic media and "for sale" signage,
15 containing a fictitious business name obtained in accordance with paragraph (2)
of subdivision (a) shall include the name and license number of the salesperson
16 who is using the fictitious business name.

17 (f) Notwithstanding Section 10185, a violation of this section is not a
misdemeanor."

18 25.

19 Code section 10148 provides:

20 "(a) A licensed real estate broker shall retain for three years copies of all
listings, deposit receipts, canceled checks, trust records, and other documents
21 executed by him or her or obtained by him or her in connection with any
transactions for which a real estate broker license is required. The retention period
22 shall run from the date of the closing of the transaction or from the date of the
listing if the transaction is not consummated. After notice, the books, accounts,
23 and records shall be made available for examination, inspection, and copying by
the commissioner or his or her designated representative during regular business
24 hours; and shall, upon the appearance of sufficient cause, be subject to audit

1 without further notice, except that the audit shall not be harassing in nature. This
2 subdivision shall not be construed to require a licensed real estate broker to retain
3 electronic messages of an ephemeral nature, as described in subdivision (d) of
4 Section 1624 of the Civil Code.

5 (b) The commissioner shall charge a real estate broker for the cost of any
6 audit, if the commissioner has found, in a final desist and refrain order issued
7 under Section 10086 or in a final decision following a disciplinary hearing held in
8 accordance with Chapter 5 (commencing with Section 11500) of Part 1 of
9 Division 3 of Title 2 of the Government Code that the broker has violated Section
10 10145 or a regulation or rule of the commissioner interpreting Section 10145.

11 (c) If a broker fails to pay for the cost of an audit as described in
12 subdivision (b) within 60 days of mailing a notice of billing, the commissioner
13 may suspend or revoke the broker's license or deny renewal of the broker's
14 license. The suspension or denial shall remain in effect until the cost is paid or
15 until the broker's right to renew a license has expired.

16 (d) The commissioner may maintain an action for the recovery of the cost
17 of an audit in any court of competent jurisdiction. In determining the cost incurred
18 by the commissioner for an audit, the commissioner may use the estimated
19 average hourly cost for all persons performing audits of real estate brokers.

20 (e) The bureau may suspend or revoke the license of any real estate
21 broker, real estate salesperson, or corporation licensed as a real estate broker, if
22 the real estate broker, real estate salesperson, or any director, officer, employee,
23 or agent of the corporation licensed as a real estate broker knowingly destroys,
24 alters, conceals, mutilates, or falsifies any of the books, papers, writings,
documents, or tangible objects that are required to be maintained by this section
or that have been sought in connection with an investigation, audit, or
examination of a real estate licensee by the commissioner.”

26.

Code section 10177, in pertinent parts, provides as follows:

“The commissioner may suspend or revoke the license of a real estate
licensee, delay the renewal of a license of a real estate licensee, or deny the
issuance of a license to an applicant, who has done any of the following, or may
suspend or revoke the license of a corporation, delay the renewal of a license of a
corporation, or deny the issuance of a license to a corporation, if an officer,
director, or person owning or controlling 10 percent or more of the corporation's
stock has done any of the following:

(d) Willfully disregarded or violated the Real Estate Law (Part 1
(commencing with Section 10000)) or Chapter 1 (commencing with Section
11000) of Part 2 or the rules and regulations of the commissioner for the

1 administration and enforcement of the Real Estate Law and Chapter 1
2 (commencing with Section 11000) of Part 2.

3 (g) Demonstrated negligence or incompetence in performing an act
4 for which he or she is required to hold a license.

5 (h) As a broker licensee, failed to exercise reasonable supervision
6 over the activities of his or her salespersons, or, as the officer designated by a
7 corporate broker licensee, failed to exercise reasonable supervision and control of
8 the activities of the corporation for which a real estate license is required.

9 (j) Engaged in any other conduct, whether of the same or a
10 different character than specified in this section, that constitutes fraud or dishonest
11 dealing.”

12 27.

13 Regulation 2831 provides:

14 “(a) Every broker shall keep a record of all trust funds received, including
15 uncashed checks held pursuant to instructions of his or her principal. This record,
16 including records maintained under an automated data processing system, shall
17 set forth in chronological sequence the following information in columnar form:

18 (1) Date trust funds received.

19 (2) From whom trust funds received.

20 (3) Amount received.

21 (4) With respect to funds deposited in an account, date of said deposit.

22 (5) With respect to trust funds previously deposited to an account,
23 check number and date of related disbursement.

24 (6) With respect to trust funds not deposited in an account, identity of
other depository and date funds were forwarded.

(7) Daily balance of said account.

(b) For each bank account which contains trust funds, a record of all trust
funds received and disbursed shall be maintained in accordance with subdivision
(a) or (c).

(c) Maintenance of journals of account cash receipts and disbursements,
or similar records, or automated data processing systems, including computer
systems and electronic storage and manipulation of information and documents,
in accordance with generally accepted accounting principles, shall constitute
compliance with subdivision (a) provided that such journals, records, or systems
contain the elements required by subdivision (a) and that such elements are
maintained in a format that will readily enable tracing and reconciliation in
accordance with Section 2831.2.

(d) Nothing in this section shall be construed to permit a violation of
Section 10145 of the Code.

(e) A broker is not required to keep records pursuant to this section of
checks which are written by a principal, given to the broker and made payable to
third parties for the provision of services, including but not limited to escrow,
credit and appraisal services, when the total amount of such checks for any
transaction from that principal does not exceed \$1,000. Upon request of the

1 Bureau or the maker of such checks, a broker shall account for the receipt and
2 distribution of such checks. A broker shall retain for three years copies of receipts
3 issued or obtained in connection with the receipt and distribution of such checks.”

4 29.

5 Regulation 2832 provides:

6 “(a) Compliance with Section 10145 of the Code requires that the broker
7 place funds accepted on behalf of another into the hands of the owner of the
8 funds, into a neutral escrow depository or into a trust fund account in the name of
9 the broker, or in a fictitious name if the broker is the holder of a license bearing
10 such fictitious name, as trustee at a bank or other financial institution not later
11 than three business days following receipt of the funds by the broker or by the
12 broker’s salesperson.

13 (b) Except as expressly provided by subdivision (d) of Section 10145 of
14 the Code or by a regulation in this article, the account into which the trust funds
15 are deposited shall not be an interest-bearing account for which prior written
16 notice can by law or regulation be required by the financial institution as a
17 condition to the withdrawal of funds.

18 (c) A check received from the offeror may be held uncashed by the
19 broker until acceptance of the offer if

20 (1) the check by its terms is not negotiable by the broker or if the offeror
21 has given written instructions that the check shall not be deposited nor cashed
22 until acceptance of the offer and

23 (2) the offeree is informed that the check is being so held before or at the
24 time the offer is presented for acceptance.

(d) In these circumstances if the offeror’s check was held by the broker in
accordance with subdivision (c) until acceptance of the offer, the check shall be
placed into a neutral escrow depository or the trust fund account, or into the hands
of the offeree if offeror and offeree expressly so provide in writing, not later than
three business days following acceptance of the offer unless the broker receives
written authorization from the offeree to continue to hold the check.

(e) Notwithstanding the provisions of subdivisions (a) and (d), a real
estate broker who is not licensed under the Escrow Law (Section 17000, et seq.,
of the Financial Code) when acting in the capacity of an escrow holder in a real
estate purchase and sale, exchange or loan transaction in which the broker is
performing acts for which a real estate license is required shall place all funds
accepted on behalf of another into the hands of the owner of the funds, into a
neutral escrow depository or into a trust fund account in the name of the broker,
or in a fictitious name if the broker is the holder of a license bearing such
fictitious name, as trustee at a bank or other financial institution not later than the
next business day following receipt of the funds by the broker or by the broker’s
salesperson.”

30.

Regulation 2731 provides:

1
2 “(a) A licensee shall not use a fictitious name in the conduct of any
3 activity for which a license is required under the Real Estate Law unless the
4 licensee is the holder of a license bearing the fictitious name.

5 (b) The Bureau shall issue a license required under the Real Estate Law
6 only in the legal name of the licensee or in the fictitious business name of a broker
7 who presents evidence of having complied with the provisions of Sections 17910
8 and 17917 of the Code.

9 (c) The commissioner may refuse to issue a license bearing a fictitious
10 name to a broker if the fictitious name:

11 (1) Is misleading or would constitute false advertising.

12 (2) Implies a partnership or corporation when a partnership or corporation
13 does not exist in fact.

14 (3) Includes the name of a real estate salesperson.

15 (4) Constitutes a violation of the provisions of Sections 17910, 17910.5,
16 17913 or 17917 of the Code.

17 (5) Is the name formerly used by a licensee whose license has since been
18 revoked.

19 (d) A license may not be issued or renewed with a fictitious business name
20 containing the term “escrow”, or any name which implies that escrow services are
21 provided, unless the fictitious business name includes the term, “a non-
22 independent broker escrow” following the name. Licensees who have been or are
23 issued a license with a fictitious business name with the term “escrow”, or any
24 term which implies that escrow services are provided, must include the term “a
non-independent broker escrow” in any advertising, signs, or electronic
promotional material.

(e) Where a licensee is a natural person, the use of a nickname in place of
his or her legal given name (first name) shall not constitute a fictitious name for
purposes of this section, provided that where the nickname is used, the licensee
also uses as a surname (last name) his or her surname as it appears on his or her
real estate license, and includes his or her Bureau-issued license identification
number as required by Section 10140.6 of the Code.”

31.

Regulation 2725 provides:

“A broker shall exercise reasonable supervision over the activities of his
or her salespersons. Reasonable supervision includes, as appropriate, the
establishment of policies, rules, procedures and systems to review, oversee,
inspect and manage:

(a) Transactions requiring a real estate license.

(b) Documents which may have a material effect upon the rights or
obligations of a party to the transaction.

(c) Filing, storage and maintenance of such documents.

(d) The handling of trust funds.

(e) Advertising of any service for which a license is required.

1 (f) Familiarizing salespersons with the requirements of federal and state
laws relating to the prohibition of discrimination.

2 (g) Regular and consistent reports of licensed activities of salespersons.

3 The form and extent of such policies, rules, procedures and systems shall
take into consideration the number of salespersons employed and the number and
location of branch offices.

4 A broker shall establish a system for monitoring compliance with such
policies, rules, procedures and systems. A broker may use the services of brokers
5 and salespersons to assist in administering the provisions of this section so long as
the broker does not relinquish overall responsibility for supervision of the acts of
6 salespersons licensed to the broker.”

7 WHEREFORE, Complainant prays that a hearing be conducted on the allegations of this
8 Accusation and that upon proof thereof, a decision be rendered imposing disciplinary action
9 against all licenses and/or license rights of Respondent COLBY SEONGWU JO, doing business
10 as Omni Property Management Co. and Omni Realty & Investment Group Co., under the Real
11 Estate Law (Part 1 of Division 4 of the Business and Professions Code), for the costs of the audit,
12 investigation, and enforcement as permitted by law, and for such other and further relief as may
13 be proper under other provisions of law.

14 Dated at Los Angeles, California this 27th day of August, 2017.

15
16 
17 MARIA SUAREZ
Supervising Special Investigator

18
19
20 cc: Colby Seongwu Jo
21 Sacto
Audits/Anitha Wijaya
22 OAH
23
24