

FILED

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BUREAU OF REAL ESTATE

By *[Signature]*

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9 **BEFORE THE BUREAU OF REAL ESTATE**
10 **STATE OF CALIFORNIA**

11 * * *

12	In the Matter of the Accusation of)	No. H- 40977 LA
13	JANETTE PARRA,)	
14	LUIS ALEJANDRO CAMPOS,)	<u>ACCUSATION</u>
15	OMG REALTY INC,)	
16	LEADERSHIP GROUP INC,)	
17	DONALD GRANT CHERRY, individually)	
18	and as designated officer of OMG Realty Inc)	
19	and Leadership Group Inc, and)	
	LUIS RAUL SANCHEZ,)	
	Respondents.)	

20 The Complainant, Maria Suarez, a Supervising Special Investigator of the State
21 of California, for cause of Accusation against JANETTE PARRA, LUIS ALEJANDRO
22 CAMPOS, OMG REALTY INC, LEADERSHIP GROUP INC, doing business as LR Financial
23 Consulting, DONALD GRANT CHERRY, individually and as designated officer of OMG
24 Realty Inc and Leadership Group Inc, and LUIS RAUL SANCHEZ, ("Respondents"), is
25 informed and alleges as follows:

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1. 1.

2 The Complainant, Maria Suarez, acting in her official capacity as a Supervising
3 Special Investigator of the State of California, makes this Accusation against JANETTE
4 PARRA, LUIS ALEJANDRO CAMPOS, OMG REALTY INC, LEADERSHIP GROUP INC,
5 DONALD GRANT CHERRY, and LUIS RAUL SANCHEZ.

2.

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

9 LICENSE HISTORY

3.

11 3(a) At all times mentioned, Respondent JANETTE PARRA ("PARRA")
12 was licensed and/or had license rights issued by the Bureau of Real Estate ("Bureau") as a real
13 estate salesperson. PARRA was originally licensed as a real estate salesperson on
14 May 25, 2011.

15 3(b) At all times mentioned, Respondent LUIS ALEJANDRO CAMPOS
16 ("CAMPOS") was licensed and/or had license rights issued by the Bureau as a real estate
17 salesperson. CAMPOS was originally licensed as a real estate salesperson on June 23, 2011.

18 3(c) At all times mentioned, Respondent OMG REALTY INC was licensed
19 and/or had license rights issued by the Bureau as a corporate real estate broker. OMG
20 REALTY INC was originally licensed as a corporate real estate broker on December 10, 2007.

21 3(d) At all times mentioned, Respondent LEADERSHIP GROUP INC was
22 licensed and/or had license rights issued by the Bureau as a corporate real estate broker.
23 LEADERSHIP GROUP INC was originally licensed as a corporate real estate broker on
24 December 10, 2007.

25 3(e) At all times mentioned, Respondent DONALD GRANT CHERRY
26 ("CHERRY") was licensed and/or had license rights issued by the Bureau as a real estate
27 broker. CHERRY was originally licensed as a real estate broker on June 23, 2001.

Accusation of Janette Parra et al.

1 3(f) From December 10, 2007, through the present, Respondent OMG
2 REALTY INC has been licensed by the Bureau as a corporate real estate broker by and through
3 Respondent CHERRY, as the designated officer and broker responsible, pursuant to Code
4 section 10159.2, for supervising the activities requiring a real estate license conducted on behalf
5 of OMG REALTY INC, or by OMG REALTY INC’s officers, agents and employees.

6 3(g) From December 10, 2007, through the present, Respondent
7 LEADERSHIP GROUP INC has been licensed by the Bureau as a corporate real estate broker
8 by and through Respondent CHERRY, as the designated officer and broker responsible,
9 pursuant to Code section 10159.2, for supervising the activities requiring a real estate license
10 conducted on behalf of LEADERSHIP GROUP INC, or by LEADERSHIP GROUP INC’s
11 officers, agents and employees.

12 3(h) At all times mentioned, Respondent LUIS RAUL SANCHEZ
13 (“SANCHEZ”) was licensed and/or had license rights issued by the Bureau as a real estate
14 salesperson. SANCHEZ was originally licensed as a real estate salesperson on June 25, 2010.

15 3(i) From May 25, 2011, through December 17, 2015, Respondent PARRA
16 was affiliated with employing broker Respondent CHERRY. From December 18, 2015,
17 through the present, PARRA is affiliated with employing broker OMG REALTY INC.

18 RELATIONSHIPS AND AFFILIATIONS

19 4.

20 At all times mentioned, Respondents PARRA and CAMPOS are married as wife
21 and husband.

22 5.

23 At all times mentioned, Respondents CAMPOS and SANCHEZ are owners of
24 and have the authority to act on behalf of Respondent OMG REALTY INC, Respondent
25 LEADERSHIP GROUP INC, and High Quality Investments LLC.

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1 PRIOR LICENSE DISCIPLINE

2 6.

3 In aggravation, on or about August 26, 2011, the Department of Real Estate filed
4 an Accusation against Respondents LEADERSHIP GROUP INC, CHERRY, and SANCHEZ in
5 Case No. H-37480 LA. On or about April 9, 2012, Respondents and the Department of Real
6 Estate entered into a Stipulation and Agreement in Case No. H-37480 LA, effective on or about
7 June 14, 2012, where Respondents stipulated to the acts and omissions in the Accusation as
8 grounds for disciplinary action in that: LEADERSHIP GROUP INC violated Code
9 sections 10130 (Performing Licensed Activity Without Real Estate License), 10137 (Prohibited
10 Employment Or Compensation Of Unlicensed Person), 10161.8 (Failure To Notify
11 Commissioner Of Employment Of Salesperson), and 10177(d) (Willfully Disregarded Or
12 Violated The Real Estate Law) and Regulations section 2726 (No Written Agreement With
13 Salesperson); CHERRY violated Code sections 10159.2 (Designated Officer Responsibility To
14 Supervise) and 10177(h) (Failure To Supervise) and Regulations section 2725 (Broker
15 Supervision); and SANCHEZ violated Code sections 10130 (Performing Licensed Activity
16 Without Real Estate License) and 10177(d) (Willfully Disregarded Or Violated The Real Estate
17 Law). Respondents' real estate licenses were suspended for 60 days, stayed upon certain terms
18 and conditions.

19 UNSUCCESSFUL SHORT SALE OF 1520 3RD ST

20 7.

21 On or about June 3, 2015, seller R. Rojas entered into a Residential Listing
22 Agreement with broker Respondent OMG REALTY INC through salesperson Respondent
23 PARRA to short sell real property at 1520 3rd St, Duarte, CA 91010 ("3rd St house").

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1 8.

2 On or about June 3, 2015, Respondent LEADERSHIP GROUP INC through
3 Respondent CAMPOS, as principal buyer, represented by broker Respondent OMG
4 REALTY INC through salesperson Respondent PARRA, submitted an offer to purchase the
5 3rd St house through a signed Residential Purchase Agreement. On or about June 3, 2015,
6 seller R. Rojas accepted the offer and signed the Residential Purchase Agreement.

7 9.

8 On or about August 3, 2015, Respondent PARRA submitted the Residential
9 Purchase Agreement from Respondents LEADERSHIP GROUP INC and CAMPOS to Wells
10 Fargo, N.A. ("Wells Fargo") for Wells Fargo's approval of a short sale for the 3rd St house.

11 10.

12 On or about April 8, 2016, High Quality Investments LLC, through Respondent
13 SANCHEZ, as principal buyer, represented by broker Respondent OMG REALTY INC through
14 salesperson Respondent PARRA, submitted an offer to purchase the 3rd St house through a
15 signed Residential Purchase Agreement.

16 11.

17 On or about April 11, 2016, Respondent PARRA submitted the Residential
18 Purchase Agreement from Respondent SANCHEZ and High Quality Investments LLC to Wells
19 Fargo for Wells Fargo's approval of a short sale for the 3rd St house.

20 12.

21 Respondents PARRA, CAMPOS, OMG REALTY INC, LEADERSHIP
22 GROUP INC, and SANCHEZ failed to disclose to Wells Fargo the fact that PARRA and
23 CAMPOS are married as wife and husband. PARRA, CAMPOS, OMG REALTY INC,
24 LEADERSHIP GROUP INC, and SANCHEZ also failed to disclose to Wells Fargo the fact
25 that CAMPOS and SANCHEZ are owners of OMG REALTY INC, LEADERSHIP
26 GROUP INC, and High Quality Investments LLC.

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13.

Respondent PARRA failed to include the real estate license numbers for herself and Respondent OMG REALTY INC on some of the 3rd St house transaction documents, including but not limited to the Residential Listing Agreement and the Residential Purchase Agreements.

14.

Respondent PARRA failed to include the Short Sale Information And Advisory at the time of preparation or signing of the Residential Listing Agreement and failed to include the Short Sale Information And Advisory and Short Sale Addendum at the time of preparation or signing of Residential Purchase Agreements for the 3rd St house.

COMPLETED SHORT SALE OF 1818 OTTERBEIN AVE

15.

On or about March 30, 2016, seller H. Palafox entered into a Residential Listing Agreement with broker Respondent OMG REALTY INC through salesperson Respondent PARRA to short sell real property at 1818 Otterbein Ave, Rowland Heights, CA 91748 ("Otterbein house").

16.

On or about April 1, 2016, High Quality Investments LLC, through Respondent CAMPOS, as principal buyer, represented by broker Respondent OMG REALTY INC through salesperson Respondent PARRA, submitted an offer to purchase the Otterbein house.

17.

On or about April 1, 2016, seller H. Palafox signed a document acknowledging that, "I am aware that Janette Parra of OMG Realty, Inc., is wife of Luis Campos. Additionally, I am aware that Luis Campos is one of the owners of the following companies:

- 1. OMG Realty, Inc. 2. Leadership Group, Inc. 3. High Quality Insurance Solutions, Inc.
- 4. High Quality Investments, Inc."

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1 18.

2 On or about February 8, 2017, Respondents PARRA and CAMPOS signed a
3 document with the title "AFFIDAVIT OF 'ARM'S LENGTH TRANSACTION'" from Ocwen
4 Loan Servicing, LLC ("Ocwen") that provided, "This affidavit is to be executed before or at the
5 time closing of the sale of the Mortgaged Premises by all Borrower(s), purchaser(s), real estate
6 brokers representing any of the parties". PARRA and CAMPOS certified under the penalty of
7 perjury that: "(a) The sale of the Mortgaged Premises is an 'arm's length' transaction, between
8 parties who are unrelated and unaffiliated by family, marriage, or commercial enterprise", and
9 "(c) Neither the Borrower(s) nor the purchaser(s) will receive any funds or commissions from
10 the sale of the Mortgaged Premises."

11 19.

12 Respondents PARRA, CAMPOS, and OMG REALTY INC failed to disclose to
13 Ocwen the fact that PARRA and CAMPOS are married as wife and husband. PARRA,
14 CAMPOS, and OMG REALTY INC also failed to disclose to Ocwen the fact that CAMPOS is
15 an owner of OMG REALTY INC and High Quality Investments LLC.

16 20.

17 Respondent PARRA altered the dates on some of the Otterbein house
18 transaction documents, including but not limited to the Residential Listing Agreement and the
19 Short Sale Information And Advisory.

20 21.

21 Respondent PARRA failed to include the real estate license numbers for herself
22 and Respondent OMG REALTY INC on some of the Otterbein house transaction documents,
23 including but not limited to the Residential Purchase Agreement.

24 22.

25 Respondent PARRA failed to include the Short Sale Information And Advisory
26 at the time of preparation or signing of the Residential Purchase Agreement for the Otterbein
27 house.

1 23.

2 On or about March 24, 2017, the Otterbein house transaction closed and High
3 Quality Investments LLC became the owner of the Otterbein house.

4 24.

5 On or about March 24, 2017, Respondent PARRA reviewed and initialed the
6 Otterbein house transaction documents.

7 25.

8 On or about March 24, 2017, the escrow company paid Respondent OMG
9 REALTY INC a commission for representing seller H. Palafox in the amount of \$10,700 and
10 another commission for representing buyer High Quality Investments LLC in the amount of
11 \$10,700, for a total of \$21,400 in commissions. On or about March 30, 2017, OMG
12 REALTY INC paid Respondent PARRA a commission for representing both seller H. Palafox
13 and buyer High Quality Investments LLC in the amount of \$9,750.

14 RECORDS PRODUCED INTO RESPONSE TO SUBPOENA

15 26.

16 On or about June 15, 2017, the Bureau conducted an investigation at the main
17 office of Respondent OMG REALTY INC and obtained some of the 3rd St house and the
18 Otterbein house transaction documents from OMG REALTY INC.

19 27.

20 On or about January 3, 2018, the Bureau served Respondents OMG
21 REALTY INC and CHERRY with subpoenas for the 3rd St house and the Otterbein house
22 transaction documents.

23 28.

24 On or about January 25, 2018, Respondents OMG REALTY INC and CHERRY
25 provided the Bureau with the 3rd St house and the Otterbein house transaction documents.

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1 29.

2 Respondents OMG REALTY INC, CHERRY, and PARRA altered the
3 Residential Listing Agreement and the Residential Purchase Agreements for the 3rd St house by
4 changing dates and adding the real estate license numbers for OMG REALTY INC and
5 PARRA. OMG REALTY INC, CHERRY, and PARRA altered the Residential Purchase
6 Agreement for the Otterbein house by adding the real estate license numbers for OMG
7 REALTY INC and PARRA. OMG REALTY INC and CHERRY submitted the altered
8 documents to the Bureau in response to the subpoenas.

9 FIRST CAUSE OF ACTION

10 SUBSTANTIAL MISREPRESENTATION, FAILURE TO DISCLOSE MATERIAL FACTS

11 30.

12 The conduct, acts, or omissions of Respondents PARRA, CAMPOS, OMG
13 REALTY INC, LEADERSHIP GROUP INC, and SANCHEZ, as described in Paragraphs 7
14 through 29 above, constitute cause for the suspension or revocation of all real estate licenses
15 and license rights of Respondents under the provisions of Code sections 10176(a), 10176(b),
16 10176(c), 10176(i), 10177(d), and/or 10177(j).

17 SECOND CAUSE OF ACTION

18 SECRET OR UNDISCLOSED AMOUNT OF COMMISSION OR PROFIT

19 31.

20 The conduct, acts, or omissions of Respondent CAMPOS as described in
21 Paragraphs 15 through 25 above, constitute the claiming or taking of any secret or undisclosed
22 amount of compensation, commission, or profit from the Otterbein house transaction through
23 his ownership of Respondent OMG REALTY INC and marriage to Respondent PARRA and
24 constitute cause for the suspension or revocation of all real estate licenses and license rights of
25 Respondent under the provisions of Code section 10176(g).

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THIRD CAUSE OF ACTION

EMPLOYMENT OF SALESPERSON BY BROKER OTHER THAN BROKER OF RECORD

32.

The conduct, acts, or omissions of Respondents PARRA and OMG REALTY INC as described in Paragraphs 7 through 9 above, are in violation of Code sections 10137 and 10161.8, which constitute cause for the suspension or revocation of all real estate licenses and license rights of Respondents under the provisions of Code sections 10137, 10177(d), and/or 10177(g).

FOURTH CAUSE OF ACTION

USE OF UNLICENSED FICTITIOUS BUSINESS NAME

33.

Respondents PARRA and OMG REALTY INC used the unlicensed fictitious business name "OMG REALTY" in violation of Code section 10159.5 and Regulations section 2731, which constitutes cause for the suspension or revocation of all the real estate licenses and license rights of Respondents pursuant to the provisions of Code sections 10177(d) and/or 10177(g).

FIFTH CAUSE OF ACTION

NEGLIGENCE OR INCOMPETENCE

34.

The conduct, acts, or omissions of Respondents PARRA, CAMPOS, OMG REALTY INC, LEADERSHIP GROUP INC, and SANCHEZ as described in Paragraphs 7 through 29 above, constitute cause for the suspension or revocation of all real estate licenses and license rights of Respondents under the provisions of Code section 10177(g).

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1 SIXTH CAUSE OF ACTION

2 FAILURE TO SUPERVISE

3 35.

4 The conduct, acts, or omissions of Respondent CHERRY, as described in
5 Paragraphs 7 through 34 above, in failing to ensure compliance of the Real Estate Law by
6 Respondents PARRA, CAMPOS, OMG REALTY INC, LEADERSHIP GROUP INC, and
7 SANCHEZ, is in violation of Code section 10159.2 and Regulations section 2725, and subjects
8 all the licenses and license rights of Respondent to suspension or revocation pursuant to Code
9 sections 10177(d), 10177(g), and/or 10177(h).

10 36.

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

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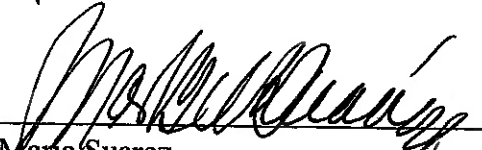
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1 WHEREFORE, Complainant prays that a hearing be conducted on the
2 allegations of this Accusation and that upon proof thereof, a decision be rendered imposing
3 disciplinary action against all the licenses and license rights of Respondents JANETTE
4 PARRA, LUIS ALEJANDRO CAMPOS, OMG REALTY INC, LEADERSHIP GROUP INC,
5 DONALD GRANT CHERRY, and LUIS RAUL SANCHEZ under the Real Estate Law, for the
6 cost of investigation and enforcement as permitted by law, and for such other and further relief
7 as may be proper under other applicable provisions of law.

8
9 Dated at Los Angeles, California

10 this 16th day of March, 2018,

11
12 
13 Maria Suarez
14 Supervising Special Investigator

15 cc: JANETTE PARRA
16 LUIS ALEJANDRO CAMPOS
17 OMG REALTY INC
18 LEADERSHIP GROUP INC
19 DONALD GRANT CHERRY
20 LUIS RAUL SANCHEZ
21 Maria Suarez
22 Sacto.