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STEVE CHU, Counsel (SBN 238155)
Department of Real Estate
320 West 4th Street, Suite 350
Los Angeles, California 90013-1105

Telephone: (213) 620-6430
Fax: (213) 576-6917

FILED
OCT 16 2018
DEPT. OF REAL ESTATE
By 

BEFORE THE DEPARTMENT OF REAL ESTATE
STATE OF CALIFORNIA

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

This Accusation amends the Accusation filed on March 19, 2018. The Complainant, Maria Suarez, a Supervising Special Investigator of the State of California, for cause of Accusation against JANETTE PARRA, LUIS ALEJANDRO CAMPOS, OMG REALTY INC, LEADERSHIP GROUP INC, doing business as LR Financial Consulting, DONALD GRANT CHERRY, individually and as designated officer of OMG Realty Inc and Leadership Group Inc, and LUIS RAUL SANCHEZ, ("Respondents"), is 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. 6

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. 10

11 3(a) At all times mentioned, Respondent JANETTE PARRA ("PARRA")
12 was licensed and/or had license rights issued by the Department of Real Estate ("Department")
13 as a real 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 Department 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 Department 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 Department as a corporate real estate broker.
23 LEADERSHIP GROUP INC was originally licensed as a corporate real estate broker on
24 December 10, 2007.

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

PRIOR LICENSE DISCIPLINE

6.

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

UNSUCCESSFUL SHORT SALE OF 1520 3RD ST

7.

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

First Amended Accusation of Janette Parra et al.

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8.

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

9.

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

10.

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

11.

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

12.

Respondents PARRA, CAMPOS, OMG REALTY INC, LEADERSHIP GROUP INC, and SANCHEZ failed to disclose to Wells Fargo the fact that PARRA and CAMPOS are married as wife and husband. PARRA, CAMPOS, OMG REALTY INC, LEADERSHIP GROUP INC, and SANCHEZ also failed to disclose to Wells Fargo the fact that CAMPOS and SANCHEZ are owners of OMG REALTY INC, LEADERSHIP 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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18.

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

19.

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

20.

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

21.

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

22.

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

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23.

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

24.

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

25.

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

RECORDS PRODUCED INTO RESPONSE TO SUBPOENA

26.

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

27.

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

28.

On or about January 25, 2018, Respondents OMG REALTY INC and CHERRY provided the Department 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 Department 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 the licenses, license
15 rights, and license endorsements of Respondents under the provisions of Code
16 sections 10176(a), 10176(b), 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 the licenses, license rights, and license
25 endorsements of Respondent under the provisions of Code section 10176(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, license rights, and license endorsements of Respondent to suspension or
9 revocation pursuant to Code 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 Department of Real Estate, the Commissioner
13 may request the administrative law judge to direct a licensee found to have committed a
14 violation of this part to pay a sum not to exceed the reasonable costs of the investigation and
15 enforcement of the case.

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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, license rights, and license endorsements of
4 Respondents JANETTE PARRA, LUIS ALEJANDRO CAMPOS, OMG REALTY INC,
5 LEADERSHIP GROUP INC, DONALD GRANT CHERRY, and LUIS RAUL SANCHEZ
6 under the Real Estate Law, for the cost of investigation and enforcement as permitted by law,
7 and for such other and further relief as may be proper under other applicable provisions of law.
8

9 Dated at Los Angeles, California

10 this 15th day of October, 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
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