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FILED

APR 22 2021

DEPT. OF REAL ESTATE

By *[Signature]*

9 BEFORE THE DEPARTMENT OF REAL ESTATE

10 STATE OF CALIFORNIA

11 * * *

12
13 In the Matter of the Accusation against) No. H-41979 LA
14 MICHAEL FRANK RICIGLIANO;)
15 NATION ONE REAL ESTATE INC;) ACCUSATION
16 and)
17 ALEX PEREZ, designated officer of)
18 Nation One Real Estate Inc,)
19 Respondents.)
20)

21 The Complainant, Maria Suarez, acting in her official capacity as a Supervising
22 Special Investigator of the State of California, for cause of Accusation against Respondents
23 MICHAEL FRANK RICIGLIANO; NATION ONE REAL ESTATE INC; and ALEX PEREZ
24 (collectively, "Respondents"), is informed and alleges as follows:
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26 1.
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1 All references to the "Code" are to the California Business and Professions Code
2 and all references to "Regulations" are to Title 10, Chapter 6, California Code of Regulations.

3 **DEPARTMENT OF REAL ESTATE LICENSE HISTORY**

4 **RESPONDENT REB MICHAEL FRANK RICIGLIANO**

5 2.

6 MICHAEL FRANK RICIGLIANO. ("RICIGLIANO" or "Respondent
7 RICIGLIANO") is presently licensed and/or has license rights under the Real Estate Law, Part 1
8 of Division 4 of the Code as a real estate broker ("REB"), Department of Real Estate
9 ("Department" or "DRE") license ID 00683546.

10 3.

11 According to DRE records to date, RICIGLIANO was first licensed by the DRE
12 on or about September 15, 1978 as a real estate salesperson ("RES") and on or about June 9,
13 1998 as a REB.

14 4.

15 According to DRE records to date, RICIGLIANO's mailing and main address of
16 record are the same: 17341 Irvine Blvd., #110, Tustin, CA 92780, and RICIGLIANO presently
17 has no active DBAs, branch offices or designated officer of record affiliations associated with his
18 REB license.

19 5.

20 According to DRE records to date, RICIGLIANO's REB license will expire on
21 June 8, 2022.

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6.

At all times mentioned herein, Respondent RICIGLIANO engaged in the performance of activities requiring a real estate license pursuant to Code Section 10130, and acted and ordered, caused, authorized or participated in licensed activities within the meaning of Code Section 10131.

RESPONDENT REC NATION ONE REAL ESTATE INC

7.

NATION ONE REAL ESTATE INC ("NATION ONE" or "Respondent NATION ONE") is presently licensed and/or has license rights under the Real Estate Law, Part 1 of Division 4 of the Code as a REB (corporation) ("REC"), DRE license ID 01976610.

8.

According to DRE records to date, NATION ONE was first licensed by the DRE on or about March 27, 2015.

9.

According to DRE records to date, NATION ONE's mailing and main address of record are the same: 17341 Irvine Blvd., Suite 200, Tustin, CA 92780, and NATION ONE presently has no branch offices and one (1) active DBA affiliated with its REC license, South Coast Escrow, a Non-Independent Broker Escrow ("South Coast Escrow"), active since July 17, 2015.

10.

According to DRE records to date, NATION ONE has nine (9) RES affiliated with its REC license, and its designated officer of record is ALEX PEREZ until his officer affiliation expiration date of March 26, 2023.

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11.

According to DRE records to date, NATION ONE's license will expire on March 26, 2023.

12.

At all times mentioned herein, Respondent NATION ONE engaged in the performance of activities requiring a real estate license pursuant to Code Section 10130, and acted and ordered, caused, authorized or participated in licensed activities within the meaning of Code Section 10131.

RESPONDENT REB ALEX PEREZ

13.

ALEX PEREZ ("PEREZ" or "Respondent PEREZ") is presently licensed and/or has license rights under the Real Estate Law, Part 1 of Division 4 of the Code as a REB, DRE license ID 01507462.

14.

According to DRE records to date, PEREZ was first licensed by the DRE on or about July 21, 2005 as a RES and on or about December 11, 2015 as a REB.

15.

According to DRE records to date, PEREZ' mailing and main address of record are the same: 327 W. Orangethorpe Ave, Fullerton, CA, and PEREZ presently has no branch offices or DBAs affiliated with his REB license.

16.

According to DRE records to date, PEREZ is the designated officer of record for NATION ONE until his officer affiliation expiration date of March 26, 2023. PEREZ is also the designated officer of record for City 2 City Home Loans Inc (DRE license ID 01792181) until

1 October 23, 2023 and Trans United Financial Services Inc (DRE license ID 01783089) until June
2 30, 2021.¹

3 17.

4 According to DRE records to date, PEREZ' license will expire on December 10,
5 2023.

6 18.

7 According to DRE records to date, also PEREZ also holds a Nationwide
8 Multistate Licensing System & Registry ("NMLS") mortgage loan originator license
9 endorsement, NMLS ID 1541205.

10 19.

11 At all times mentioned herein, Respondent PEREZ engaged in the performance of
12 activities requiring a real estate license pursuant to Code Section 10130, and acted and ordered,
13 caused, authorized or participated in licensed activities within the meaning of Code Section
14 10131.

15 **[Unlicensed] Hugo Fabian Flores and Valley Grove Financial**

16 20.

17 Hugo Fabian Flores ("Flores") is not presently licensed by the DRE and has no
18 license rights. Valley Grove Financial is not presently licensed by the DRE and has no license
19 rights.

20 21.

21 According to DRE records to date, the DRE has never licensed any individual by
22 the name of Hugo Fabian Flores in any capacity.² According to DRE records to date, the DRE
23 has never licensed Valley Grove Financial in any capacity.

24 _____
25 ¹ PEREZ' designated officer affiliation with Trans United Financial Services Inc was set to expire on December 9,
26 2020; however, pursuant to Governor Newsom's Executive Order No. N-83-20, PEREZ' officer license expiration
27 date was extended until June 30, 2021.

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According to a July 28, 2020 Fictitious Business Name ("FBN") Statement filed with the Orange County Clerk-Recorder's Office, Hugo Fabian Flores Flores [sic] is the registered owner of Valley Grove Financial located at 1971 Ritchey Street, Santa Ana, CA 92705. According to the July 28, 2020 FBN Statement, Valley Grove Financial began doing business on July 3, 2019, and business is conducted by Hugo Fabian Flores Flores [sic], who is its CEO.

FACTS DISCOVERED BY THE DEPARTMENT

23.

Consumer Complaint by Francisco V. (2/6/20)

On or about February 6, 2020, the DRE received a consumer complaint from Francisco V. ("Francisco V. complaint") regarding a November 2019 refinance of his property located in Santa Ana, California ("Santa Ana property") that was processed by Flores at 17341 Irvine Blvd. in Tustin, CA. According to Francisco V., the refinance documents were signed at his address located at 2539 Notre Dame Ave. in Pomona, CA ("Pomona property"), but were associated with a loan on his Santa Ana property. According to Francisco V., in late December, he received mail from Los Angeles County regarding a \$33,150 lien on his Pomona property for beneficiary Tapestry Investments, LLC (Deed of Trust dated November 14, 2019) to which he neither had knowledge of, or consented to. According to the Francisco V. complaint, when Francisco V. contacted First American Title Company, he was instructed to contact Jessica Olivarria of South Coast Escrow and informed that Flores had requested the Deed of Trust. When Francisco V. contacted Flores, he was told by Flores that there had been a mistake and that

² According to DRE records to date, an individual by the name of Hugo Flores is presently licensed and/or has license rights under the Real Estate Law, Part 1 of Division 4 of the Code as a RES (DRE license ID 0108555) and has no real estate broker affiliation.

1 Jennifer Chavez of Ticor Title would complete a reconveyance to remove the lien from the
2 property.

3 24.

4 According to the Deed of Trust dated November 14, 2019, and recorded/filed with
5 the Los Angeles County Recorder on November 25, 2019, a promissory note in the amount of
6 \$33,150 was executed by Trustor Francisco V. and Trustee RESS Financial Corporation, in favor
7 of Beneficiary Tapestry Investments, LLC. Said Deed of Trust included a signature for Francisco
8 V. dated November 21, 2019.

9 25.

10 Consumer Complaint by RICIGLIANO (3/6/20)

11 On or about March 6, 2020, the DRE received a consumer complaint from
12 RICIGLIANO ("RICIGLIANO complaint") regarding Francisco V.'s transaction with Flores.
13 (Included in the RICIGLIANO complaint was a February 27, 2020 withdrawal of the Francisco
14 V. complaint signed by Francisco V., described above in Paragraph 23 and a statement that the
15 Second Deed of Trust on the Pomona property has been reconveyed and paid in full as of
16 February 27, 2020.)

17 26.

18 According to the RICIGLIANO complaint, Flores does not, and has never been
19 affiliated with RICIGLIANO. According to RICIGLIANO, he and Flores worked in the same
20 building, and aside from the Francisco V. transaction, RICIGLIANO has also worked with Flores
21 on a loan transaction that involved borrower David C. According to RICIGLIANO, Flores
22 approached him in or about November 2019 about his [Flores'] client's desire for a hard money
23 loan. According to RICIGLIANO, he found an investor and the loan documents were prepared
24 by South Coast Escrow, which Flores represented he would get executed [by Francisco V.],
25 notarized and returned to South Coast Escrow, along with wire instructions for the proceeds.

1 Two months after the investor wired the funds to escrow and the loan was recorded, Francisco V.
2 contacted escrow and indicated that he never executed the note, deed of trust, or any of the
3 escrow documents. According to RICIGLIANO, Francisco V. discontinued his contact with
4 Flores and began to work exclusively with RICIGLIANO.

5 27.

6 South Coast Escrow File 19-2535-JO (Pomona Property)

7 According to the escrow file received by the DRE from South Coast Escrow for
8 Escrow No. 19-2535-JO (First American Title Company Order Number O-SA-6088054), South
9 Coast Escrow received a wire transfer into its trust account ending -1980 from Brick W. in the
10 amount of \$30,200.00 on or about November 22, 2019. According to the Buyer Borrower
11 Disbursement of Funds instructions [in Escrow File No. 19-2535-JO], the wire transfer
12 instructions bore a signature for Francisco V. and directed a wire transfer of funds to a Bank of
13 America account ending -5861 bearing the accountholder name of Valley Grove Financial.
14 Handwritten across the top of the instructions sheet was the amount \$22,022.88.

15 28.

16 Subpoenaed Bank Records from Bank of America for Account -5861: Valley Grove Financial

17 On or about September 21, 2020, the DRE served a *Subpoena Duces Tecum* dated
18 September 16, 2020 on Bank of America for November 1, 2019 to December 31, 2019 bank
19 records for Hugo Flores/Valley Grove Financial for the account ending -5861. According to Bank
20 of America's responsive production of records, Bank of America account ending -5861 is a
21 savings account that was opened on or about July 17, 2019 in the name of Valley Grove
22 Financial/ Hugo Fabian Flores/ Jennifer Alfaro Chavez, designated on the bank signature card as
23 a general partnership owned by Hugo Fabian Flores and Jennifer Alfaro Chavez. Among Bank
24 of America's responsive records was a bank statement for the period November 1, 2019 to
25 November 30, 2019 that included a November 26, 2019 wire transfer deposit received from
26
27

1 "Nation One Real Estate...Mechanics Bank...2539 Notre Dame Ave" in the amount of
2 \$22,022.88.

3 29.

4 According to the Substitution of Trustee and Full Reconveyance dated February
5 26, 2020, and recorded/filed with the Los Angeles County Recorder on February 27, 2020,
6 Tapestry Investments, LLC was appointed as trustee in the stead of RESS Financial Corporation
7 under the November 14, 2019 Deed of Trust and reconveyed the estate.

8 30.

9 South Coast Escrow Files Submitted to the DRE for Investigation

10 Between August 2020 and November 2020, the DRE requested South Coast
11 Escrow to submit for investigation its escrow service files relating to RICIGLIANO and
12 Francisco V.'s Pomona property, Francisco V.'s Santa Ana property, and David C.'s property.
13 South Coast Escrow produced the following escrow transaction files: 19-2535-JO (Pomona
14 property); 19-2967-JO (2116 W. Borchard Ave., Santa Ana, CA 92704; "Santa Ana property");
15 and 19-2799-JO (David C.'s property located at 709 W. 50th St., Los Angeles, CA 90037), all
16 escrow transactions of which Nation One/South Coast performed as a third-party.

17 31.

18 According to the November 25, 2019 Closing Statement in Escrow 19-2535-JO,
19 origination fees totaling \$5,000.00 were split between RICIGLIANO (\$3,000.00) and Flores
20 (\$2,000.00). According to the November 15, 2019 Closing Statement in Escrow 19-2799-JO,
21 fees totaling \$4,000.00 were split between RICIGLIANO (\$2,000.00) and Flores (\$2,000.00).

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1 **APPLICABLE SECTIONS OF THE REAL ESTATE LAW**

2 **License Required - Code Sections 10130 and 10131**

3 32.

4 Pursuant to Code Section 10130 *License Required:*

5 "It is unlawful for any person to engage in the business of, act in the capacity of,
6 advertise as, or assume to act as a real estate broker or a real estate salesperson within this state
7 without first obtaining a real estate license from the department, or to engage in the business of,
8 act in the capacity of, advertise as, or assume to act as a mortgage loan originator within this state
9 without having obtained a license endorsement. The commissioner may prefer a complaint for
10 violation of this section before any court of competent jurisdiction, and the commissioner and his
11 or her counsel, deputies, or assistants, may assist in presenting the law or facts at the trial.

12 *Prosecution of Violations:* It is the duty of the district attorney of each county in this state to
13 prosecute all violations of this section in their respective counties in which the violations
14 occur."

15 33.

16 Pursuant to Code Section 10131 *Broker Defined:*

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

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

23 (b) Leases or rents or offers to lease or rent, or places for rent, or solicits listings
24 of places for rent, or solicits for prospective tenants, or negotiates the sale,
25 purchase or exchanges of leases of real property, or on a business opportunity, or
26

1 collects rents from real property, or improvements thereon, or from business
2 opportunities.

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

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

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

13 **Unlawful Retention or Payment of Compensation - Code Section 10137**

14 34.

15 Pursuant to Code Section 10137 *Unlawful Retention or Payment of Compensation*

16 – *Penalty:*

17 “It is unlawful for any licensed real estate broker to employ or compensate,
18 directly or indirectly, any person for performing any of the acts within the scope of this chapter
19 who is not a license real estate broker, or a real estate salesperson licensed under the broker
20 employing or compensating him or her, or to employ or compensate, directly or indirectly, any
21 licensee for engaging in any activity for which a mortgage loan originator license endorsement is
22 required, if that licensee does not hold a mortgage loan originator license endorsement; provided,
23 however, that a licensed real estate broker may pay a commission to a broker of another state.
24 No real estate salesperson shall be employed by or accept compensation for activity requiring a
25 real estate license from any person other than the broker under whom he or she is at the time
26
27

1 licensed. It is unlawful for any licensed real estate salesperson to pay any compensation for
2 performing any of the acts within the scope of this chapter to any real estate licensee except
3 through the broker under whom he or she is at the time licensed. For a violation of any of the
4 provisions of this section, the commissioner may temporarily suspend or permanently revoke the
5 license of the real estate licensee, in accordance with the provisions of this part relating to
6 hearings.”

7 **Broker Supervision – Code Section 10159.2 and Regulation 2725**

8 35.

9 Pursuant to Code Section 10159.2 *Responsibility of Corporate Officer in Charge:*

10 “(a) The officer designated by a corporate broker licensee pursuant to Section
11 10211 shall be responsible for the supervision and control of the activities conducted on behalf
12 of the corporation by its officers and employees as necessary to secure full compliance with the
13 provisions of this division, including the supervision of salespersons licensed to the corporation
14 in the performance of acts for which a real estate license is required.

15 (b) A corporate broker licensee that has procured additional licenses in accordance
16 with Section 10158 through officers other than the officer designated pursuant to Section 10211
17 may, by appropriate resolution of its board of directors, assign supervisory responsibility over
18 salespersons licensed to the corporation to its broker-officers.

19 (c) A certified copy of any resolution of the board of directors assigning
20 supervisory responsibility over real estate salespersons licensed to the corporation shall be filed
21 with the Real Estate Commissioner within five days after the adoption or modification thereof.”

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Pursuant to Regulation 2725 *Broker Supervision*:

“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.
- (f) Familiarizing salespersons with the requirements of federal and state laws relating to the prohibition of discrimination.
- (g) Regular and consistent reports of licensed activities of salespersons.

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. A broker shall establish a system for monitoring compliance with such policies, rules, procedures and systems. A broker may use the services of brokers 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 salespersons licensed to the broker.”

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1 **Grounds for Revocation or Suspension –**

2 **Code Section 10176 (selected portions)**

3 38.

4 Pursuant to Code Section 10176 *Grounds for Revocation or Suspension*:

5 “The commissioner may, upon his or her own motion, and shall, upon the verified
6 complaint in writing of any person, investigate the actions of any person engaged in the business
7 or acting in the capacity of a real estate licensee within this state, and he or she may temporarily
8 suspend or permanently revoke a real estate licensee at any time where the licensee, while a real
9 estate licensee, in performing or attempting to perform any of the acts within the scope of this
10 chapter has been guilty of any of the following:

11 ...

- 12
- 13 (i) Any other conduct, whether of the same or a different character than specified
14 in this section, which constitutes fraud or dishonest dealing...”

15 **Further Grounds for Disciplinary Action – Code Section 10177**

16 39.

17 Pursuant to Code Section 10177, “The commissioner may suspend or revoke the
18 license of a real estate licensee, delay the renewal of a license of a real estate licensee, or deny the
19 issuance of a license to an applicant, who has done any of the following:

20 ...

- 21 (d) Willfully disregarded or violated the Real Estate Law (Part 1 (commencing
22 with Section 10000)) or Chapter 1 (commencing with Section 11000) of Part 2 or
23 the rules and regulations of the commissioner for the administration and
24 enforcement of the Real Estate Law and Chapter 1 (commencing with Section
25 11000) of Part 2.

1
2 (g) Demonstrated negligence or incompetence in performing an act for which he
3 or she is required to hold a license.

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

8 **Financial Code Section 17006**

9 40.

10 Pursuant to Financial Code Section 17006:

11 “(a) This division does not apply to:

12 (1) Any person doing business under any law of this state or the United States
13 relating to banks, trust companies, building and loan or savings and loan associations, credit
14 unions, or insurance companies.

15 (2) Any person licensed to practice law in California who has a bona fide client
16 relationship with a principal in a real estate or personal property transaction and who is not
17 actively engaged in the business of an escrow agent.

18 (3) Any person whose principal business is that of preparing abstracts or making
19 searches of title that are used as a basis for the issuance of a policy of title insurance by a
20 company doing business under any law of this state relating to insurance companies.

21 (4) Any broker licensed by the Real Estate Commissioner while performing acts
22 in the course of or incidental to a real estate transaction in which the broker is an agent or a party
23 to the transaction and in which the broker is performing an act for which a real estate license is
24 required.
25

1 (b) The exemptions provided for in paragraphs (2) and (4) of subdivision (a) are
2 personal to the persons listed, and those persons shall not delegate any duties other than duties
3 performed under the direct supervision of those persons. Notwithstanding the provisions of this
4 subdivision, the exemptions provided for in paragraphs (2) and (4) of subdivision (a) are not
5 available for any arrangement entered into for the purpose of performing escrows for more than
6 one business.”

7 **VIOLATIONS OF THE REAL ESTATE LAW – CAUSES FOR DISCIPLINE**

8 41.

9
10 Complainant re-alleges and incorporates by reference the preceding paragraphs as
11 set forth herein.

12 42.

13 In the course of the activities described above, and based on the facts discovered
14 by the Department, also described above, the acts and/or omissions of Respondent **MICHAEL**
15 **FRANK RICIGLIANO**, in his performance of real estate activities (loan origination activities)
16 with Hugo Fabian Flores, for which a mortgage loan origination license endorsement is required,
17 when neither Flores nor RICIGLIANO properly held such endorsement, are in violation of **Code**
18 **Sections 10130 and 10166.03** and constitute cause for the suspension or revocation of all
19 licenses and license rights of Respondent RICIGLIANO under the Real Estate Law (**Code**
20 **Sections 10176(i) and 10177(d)**).

21 43.

22 In the course of the activities described above, and based on the facts discovered
23 by the Department, also described above, the acts and/or omissions of Respondent **NATION**
24 **ONE REAL ESTATE INC**, in its performance of non-exempt/third-party escrows in at least
25 three (3) transactions to which it was not otherwise involved, are outside of, and in violation of
26
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1 **Financial Code Section 17006(a)(4)** and constitute cause for the suspension or revocation of all
2 licenses and license rights of Respondent NATION ONE under the Real Estate Law (**Code**
3 **Sections 10177(d) and (g)**).

4 44.

5 In the course of the activities described above, and based on the facts discovered
6 by the Department, also described above, the acts and/or omissions of Respondent **ALEX**
7 **PEREZ**, in his failure to exercise reasonable supervision over NATION ONE's real estate
8 activities, are in violation of **Code Sections 10159.2 and 10177(h) and Regulation 2725** and
9 constitute cause for the suspension or revocation of all licenses and license rights of Respondent
10 **PEREZ** under the Real Estate Law.

11 COSTS

12 45.

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

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1 WHEREFORE, Complainant prays that a hearing be conducted on the allegations
2 of this Accusation and that upon proof thereof, a decision be rendered imposing disciplinary
3 action against all the licenses and license rights of Respondents MICHAEL FRANK
4 RICIGLIANO, NATION ONE REAL ESTATE INC, and ALEX PEREZ under the Real Estate
5 Law (Part 1 of Division 4 of the Business and Professions Code), and for such other and further
6 relief as may be proper under other applicable provisions of law.

7 Dated at Los Angeles, California

8 this 10th day of April 2021.

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12 _____
13 Maria Suarez
14 Supervising Special Investigator
15

16 cc: Michael Frank Ricigliano
17 Nation One Real Estate Inc
18 Alex Perez
19 Enforcement - M. Suarez
20 Sacto.
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