SACTO Flag

FILED

OCT 21 2011

DEPARTMENT OF REAL ESTATE
BY: [signature]

BEFORE THE DEPARTMENT OF REAL ESTATE

STATE OF CALIFORNIA

* * *

In the Matter of the Accusation of STEPHEN PAUL COLLETTE and RAMIN LAVI, Respondents.	No. H-36993 LA

DECISION

This Decision is being issued in accordance with the provisions of Section 11520 of the Government Code, on evidence of compliance with Section 11505 of the Government Code and pursuant to the Order of Default filed on September 20, 2011 and the findings of fact set forth herein are based on one or more of the following: (1) Respondent's express admissions; (2) affidavits; and (3) other evidence.

FINDINGS OF FACT

1.

On October 14, 2010, Robin Trujillo made the Accusation in her official capacity as a Deputy Real Estate Commissioner of the State of California. The Accusation, Statement to Respondent, and Notice of Defense were mailed by certified mail, return receipt requested, and by regular mail to STEPHEN PAUL COLLETTE's ("Respondent") last known mailing address on file with the Department on December 23, 2010. Both mailings were returned to sender by the postal service with an expired forwarding address for Respondent. On January 6, 2011, the Accusation was mailed to another known address of Respondent by certified and regular mail. Both mailings were returned to sender by the postal service with no forwarding address.

On May 19, 2010, Robin Trujillo made the First Amended Accusation in her official capacity as a Deputy Real Estate Commissioner of the State of California. On June 3, 2011, the First Amended Accusation, Statement to Respondent, and Notice of Defense were mailed by certified mail, return receipt requested, and by regular mail to the expired forwarding address of Respondent, which was listed by the post office on the December 23, 2010 mailing. The June 3, 2011 mailing was returned to sender by the postal service with no forwarding address. No response has been received to date.

On September 20, 2011, no Notice of Defense having been filed herein within the time prescribed by Section 11506 of the Government Code, Respondent's default was entered herein.

2.

Respondent is presently licensed and/or has license rights under the Real Estate Law, Part 1 of Division 4 of the California Business and Professions Code ("Code") as a real estate broker.

3.

On July 10, 2008, Respondent filed Articles of Incorporation with the California Secretary of State, naming him as the incorporator and agent for service of process for EQ Group, Inc ("EQ").

4.

On or about August 11, 2009, Sylvia Miranda signed an agreement on EQ letterhead, authorizing Respondent "of EQ Group, Inc." to represent her and negotiate on her behalf regarding all matters pertaining to her home loan. Sylvia Miranda also submitted advance fees of $1,000 to EQ, for the purpose of performing a loan modification, on August 11, 2009.

5.

On or about August 18, 2008, Mylah Balitao signed an agreement on EQ letterhead, authorizing Respondent "of EQ Group, Inc." to represent her and negotiate on her behalf regarding all matters pertaining to her home loan. Mylah Balitao also submitted advance fees of $1,900 to EQ, for the purpose of performing a loan modification, on August 18, 2008.

6.

On or about October 28, 2008, Joshua Linstrom signed an agreement on EQ letterhead, authorizing Respondent "of EQ Group, Inc." to represent him and negotiate on his behalf regarding all matters pertaining to her home loan. EQ also requested and received advance fees of $3,500 from Linstrom for the purpose of performing a loan modification.

7.

On or about August 4, 2008, Charlie Clark was solicited over telephone regarding loan modification services provided by EQ. On this date, Mr. Clark entered into an agreement for EQ to provide loan modification services for his home loan. Charlie Clark also submitted advance fees of $3,000 to EQ, for the purpose of performing a loan modification, on August 4, 2008. On August 15, 2008, Respondent sent a letter to Countrywide loans on EQ letterhead, indicating that he represented Charlie Clark. On November 4, 2008, LAVI sent a letter to Mr. Clark on EQ letterhead, requesting tax returns "in order to finish your loan modification". On April 9, 2009, Charlie Clark received a release agreement from EQ, which would authorize transferring Mr. Clark's advance fees to Respondent.

8.

On or about February 9, 2011, Respondent was disbarred from the practice of law in California by the Supreme Court of California, in Case No. S188651. The disbarment was based upon a Decision and Order of Involuntary Inactive Enrollment filed by the State Bar Court of California against Respondent on October 6, 2010.

9.

The Decision and Order of Involuntary Inactive Enrollment contained factual findings, based upon clear and convincing evidence that Respondent failed to maintain client funds in a trust account, Respondent misappropriated client funds, Respondent engaged in unauthorized practice of law in another jurisdiction and Respondent failed to refund unearned fees paid to EQ.

DETERMINATION OF ISSUES

1.

The agreements described in Paragraphs 4 through 7 above, constitute advance fee agreements within the meaning of Code Section 10026. Respondent failed to submit the advance fee agreements referred to in Paragraphs 4 through 7 above, to the Commissioner ten days before using them, in violation of Code Section 10085 and Section 2970 of Title 10, California Code of Regulations ("Regulations").

2.

The conduct, acts and/or omissions of Respondent, as set forth in paragraphs 4 through 7 above, are cause for the suspension or revocation of the licenses and license rights of Respondent, pursuant to Code Sections 10085, 10177(d) and 10177(g).

3.

The allegations set forth in Paragraphs 8 and 9 above constitute cause under Section 10177(f) of the Code for the suspension or revocation of the license and license rights of Respondent under the Real Estate Law.

The standard of proof applied was clear and convincing proof to a reasonable certainty.

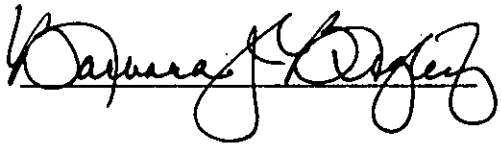
ORDER

The license and license rights of Respondent STEPHEN PAUL COLLETTE under the provisions of Part I of Division 4 of the Business and Professions Code are revoked.

This Decision shall become effective at 12 o'clock noon on NOV 10 2011.

DATED: 10/17/11.

BARBARA J. BIGBY
Acting Real Estate Commissioner



Department of Real Estate
320 West Fourth Street, Suite 350
Los Angeles, CA 90013

(213) 576-6982

FILED

SEP 20 2011

DEPARTMENT OF REAL ESTATE
BY: [illegible]

BEFORE THE DEPARTMENT OF REAL ESTATE

STATE OF CALIFORNIA

* * *

In the Matter of the Accusation of STEPHEN PAUL COLLETTE and RAMIN LAVI, Respondents.	No. H-36993 LA DEFAULT ORDER

Respondent STEPHEN PAUL COLLETTE, having failed to file a Notice of Defense within the time required by Section 11506 of the Government Code, is now in default. It is, therefore, ordered that a default be entered on the record in this matter.

IT IS SO ORDERED SEPTEMBER 19, 2011

BARBARA J. BIGBY
Acting Real Estate Commissioner

By: [signature]
PHILLIP IHDE
Regional Manager

SACTO
FIAC

FILED

SEP 06 2011

DEPARTMENT OF REAL ESTATE
BY: [illegible]

Department of Real Estate
320 West Fourth Street, #350
Los Angeles, California 90013

(213) 576-6982
(213) 576-6910

BEFORE THE DEPARTMENT OF REAL ESTATE

STATE OF CALIFORNIA

* * *

In the Matter of the Accusation of STEVEN PAUL COLLETE and RAMIN LAVI, Respondents.	No. H-36993 LA L-2011010830 STIPULATION AND AGREEMENT

It is hereby stipulated by and between RAMIN LAVI (sometimes referred to as "Respondent") and the Complainant, acting by and through James A. Demus, Counsel for the Department of Real Estate, as follows for the purpose of settling and disposing of the Accusation filed on December 23, 2010 and the First Amended Accusation filed on June 3, 2011, in this matter:

1. All issues which were to be contested and all evidence which was to be presented by Complainant and Respondents at a formal hearing on the Accusation, which hearing was to be held in accordance with the provisions of the Administrative Procedure Act ("APA"), shall instead and in place thereof be submitted solely on the basis of the provisions of

this Stipulation and Agreement ("Stipulation").

2. Respondent has received, read and understands the Statement to Respondent, the Discovery Provisions of the APA and the Accusation, filed by the Department of Real Estate in this proceeding.

3. On December 30, 2010, Respondent filed a Notice of Defense pursuant to Section 11506 of the Government Code for the purpose of requesting a hearing on the allegations in the Accusation. Respondent hereby freely and voluntarily withdraws said Notice of Defense. Respondent acknowledges that she understands that by withdrawing said Notice of Defense, she will thereby waive her right to require the Commissioner to prove the allegations in the Accusation at a contested hearing held in accordance with the provisions of the APA and that she will waive other rights afforded to her in connection with the hearing such as the right to present evidence in defense of the allegations in the Accusation and the right to cross-examine witnesses.

4. This Stipulation is based on the factual allegations contained in the Accusation filed in this proceeding. In the interest of expedience and economy, Respondent chooses not to contest these factual allegations, but to remain silent and understands that, as a result thereof, these factual statements will serve as a prima facie basis for the disciplinary action stipulated to herein. The Real Estate Commissioner shall not be required to provide further evidence to prove such allegations.

5. This Stipulation and Respondent's decision not to contest the Accusation are made for the purpose of reaching an agreed disposition of this proceeding and are expressly limited to this proceeding and any other proceeding or case in which the Department of Real Estate ("Department"), or another licensing agency of this state, another state or if the federal government is involved and otherwise shall not be admissible in any other criminal or civil proceedings.

6. It is understood by the parties that the Real Estate Commissioner may adopt the Stipulation as her decision in this matter thereby imposing the penalty and sanctions on Respondent's real estate license and license rights as set forth in the below "Order". In the event that the Commissioner in her discretion does not adopt the Stipulation, the Stipulation shall be void and of no effect, and Respondent shall retain the right to a hearing on the Accusation under all the provisions of the APA and shall not be bound by any stipulation or waiver made herein.

7. The Order or any subsequent Order of the Real Estate Commissioner made pursuant to this Stipulation shall not constitute an estoppel, merger or bar to any further administrative or civil proceedings by the Department of Real Estate with respect to any conduct which was not specifically alleged to be causes for accusation in this proceeding.

DETERMINATION OF ISSUES

By reason of the foregoing stipulations and waivers and solely for the purpose of settlement of the pending Accusation

without a hearing, it is stipulated and agreed that the following determination of issues shall be made:

The conduct, acts and/or omissions of Respondent RAMIN LAVI as described in Paragraph 4, constitute cause for the suspension or revocation of all the real estate licenses and license rights of Respondent RAMIN LAVI under the provisions of Sections 10085, 10177(d) and 10177(g) of the Business and Professions Code ("Code").

ORDER

WHEREFORE, THE FOLLOWING ORDER is hereby made:

I

A. All licenses and license rights of Respondent RAMIN LAVI under the Real Estate Law are suspended for a period of sixty (60) days from the effective date of this Decision; provided, however, that sixty (60) days of said suspension shall be stayed for two (2) years upon the following terms and conditions:

(1) Respondent RAMIN LAVI shall obey all laws, rules and regulations governing the rights, duties and responsibilities of a real estate licensee in the State of California; and

(2) That no final subsequent determination be made after hearing or upon stipulation, that cause for disciplinary action occurred within two (2) years from the effective date of this Decision. Should such a determination be made, the Commissioner may, in her discretion, vacate and set aside the stay order and reimpose all or a portion of the stayed

suspension. Should no such determination be made, the stay imposed herein shall become permanent.

II

Respondent RAMIN LAVI shall within six (6) months from the effective date of the Decision herein, take and pass the Professional Responsibility Examination administered by the Department including the payment of the appropriate examination fee. If Respondent RAMIN LAVI fails to satisfy this condition, the Commissioner may order suspension of Respondent RAMIN LAVI's license until Respondent passes the examination.

DATED: 8/18/11

JAMES A. DEMUS, Counsel for the Department of Real Estate

* * *

I have read the Stipulation and Agreement and its terms are understood by me and are agreeable and acceptable to me. I understand that I am waiving rights given to me by the California Administrative Procedure Act (including but not limited to Sections 11506, 11508, 11509 and 11513 of the Government Code), and I willingly, intelligently and voluntarily waive those rights, including the right of requiring the Commissioner to prove the allegations in the Accusation at a hearing at which I would have the right to cross-examine witnesses against me and to present evidence in defense and

mitigation of the charges.

Respondent can signify acceptance and approval of the terms and conditions of this Stipulation and Agreement by faxing a copy of the signature page, as actually signed by Respondent, to the Department at the following fax number: (213) 576-6917. Respondent agrees, acknowledges and understands that by electronically sending to the Department a fax copy of her actual signature as it appears on the Stipulation and Agreement, that receipt of the faxed copy by the Department shall be as binding on Respondent as if the Department had received the original signed Stipulation and Agreement.

DATED: _____

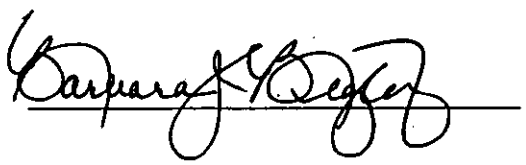
_____
RAMIN LAVI
Respondent

* * *

The foregoing Stipulation and Agreement is hereby adopted as my Decision and Order in this matter, and shall become effective at 12 o'clock noon on SEP 26 2011.

IT IS SO ORDERED 8/26, 2011.

BARBARA J. BIGBY
Acting Real Estate Commissioner



mitigation of the charges.

Respondent can signify acceptance and approval of the terms and conditions of this Stipulation and Agreement by faxing a copy of the signature page, as actually signed by Respondent, to the Department at the following fax number: (213) 576-6917. Respondent agrees, acknowledges and understands that by electronically sending to the Department a fax copy of her actual signature as it appears on the Stipulation and Agreement, that receipt of the faxed copy by the Department shall be as binding on Respondent as if the Department had received the original signed Stipulation and Agreement.

DATED: 8/16/11

RAMIN LAVI
Respondent

* * *

The foregoing Stipulation and Agreement is hereby adopted as my Decision and Order in this matter, and shall become effective at 12 o'clock noon on _____.

IT IS SO ORDERED _____, 2011.

BARBARA J. BIGBY
Acting Real Estate Commissioner

_____

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FILED

JUN 03 2011

DEPARTMENT OF REAL ESTATE
BY: Gustavo Valencia

JAMES DEMUS, Counsel (SBN 225005)
Department of Real Estate
320 West Fourth St., #350
Los Angeles, CA 90013

(213) 576-6982
(213) 576-6910 (direct)

BEFORE THE DEPARTMENT OF REAL ESTATE

STATE OF CALIFORNIA

* * *

In the Matter of the Accusation of STEPHEN PAUL COLLETTE and RAMIN LAVI, Respondents.	No. H-36993 LA OAH No.L-2011010830 FIRST AMENDED ACCUSATION

This Accusation amends the Accusation filed on December 23, 2010. The Complainant, Robin Trujillo, a Deputy Real Estate Commissioner of the State of California, for cause of Accusation against STEPHEN PAUL COLLETTE and RAMIN LAVI, is informed and alleges as follows:

1.

The Complainant, Robin Trujillo, a Deputy Real Estate Commissioner of the State of California, makes this Accusation in her official capacity.

2.

STEPHEN PAUL COLLETTE, (hereinafter "COLLETTE") is presently licensed and/or has license rights under the Real

Estate Law (Part 1 of Division 4 of the Business and Professions Code, hereinafter "Code"), as a real estate broker.

3.

RAMIN LAVI, (hereinafter "LAVI") is presently licensed and/or has license rights under the Real Estate Law, hereinafter "Code"), as a real estate salesperson.

4.

EQ Group, Inc (hereinafter "EQ"), is not now and has never been licensed by the Department in any capacity. On July 10, 2008, COLLETTE filed Articles of Incorporation with the California Secretary of State, naming COLLETTE as the incorporator and agent for service of process for EQ. On May 1, 2009, COLLETTE submitted a letter to the Department in which he admitted being part owner of EQ and described the loan modification business performed by EQ in detail.

FIRST CAUSE OF ACCUSATION

(Advance Fee Violations)

5.

COLLETTE engaged in the business of a real estate broker in the State of California within the meaning of Code Sections 10131(d) and 10131.2, including brokering mortgage loans and performing loan modification activities and claiming, demanding, charging, receiving, collecting or contracting for the collection of an advance fee, within the meaning of Code Section 10026, including, but not limited to, the following loan modification activities with respect to loans which were secured by liens on real property.

6.

Sylvia Miranda Transaction

On or about August 11, 2009, Sylvia Miranda signed an agreement on EQ letterhead, authorizing COLLETE "of EQ Group, Inc." to represent her and negotiate on her behalf regarding all matters pertaining to her home loan. Sylvia Miranda also submitted advance fees of $1,000 to EQ, for the purpose of performing a loan modification, on August 11, 2009.

7.

Mylah Balitao Transaction

On or about August 18, 2008, Mylah Balitao signed an agreement on EQ letterhead, authorizing COLLETE "of EQ Group, Inc." to represent her and negotiate on her behalf regarding all matters pertaining to her home loan. Mylah Balitao also submitted advance fees of $1,900 to EQ, for the purpose of performing a loan modification, on August 18, 2008.

8.

Joshua Linstrom Transaction

On or about October 28, 2008, Joshua Linstrom signed an agreement on EQ letterhead, authorizing COLLETE "of EQ Group, Inc." to represent her and negotiate on her behalf regarding all matters pertaining to her home loan. EQ also requested and received advance fees of $3,500 from Linstrom for the purpose of performing a loan modification.

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9.

Charlie Clark Transaction

On or about August 4, 2008, Charlie Clark was solicited over telephone by LAVI, regarding loan modification services provided by EQ. On this date, Mr. Clark entered into an agreement for EQ to provide loan modification services for his home loan. Charlie Clark also submitted advance fees of $3,000 to EQ, for the purpose of performing a loan modification, on August 4, 2008. On August 15, 2008, COLLETTE sent a letter to Countrywide loans on EQ letterhead, indicating that he represented Charlie Clark. On November 4, 2008, LAVI sent a letter to Mr. Clark on EQ letterhead, requesting tax returns "in order to finish your loan modification". On April 9, 2009, Charlie Clark received a release agreement from EQ, which would authorize transferring Mr. Clark's advance fees to COLLETTE.

10.

The agreements described in Paragraphs 6 through 9 above, constitute advance fee agreements within the meaning of Code Section 10026. COLLETTE failed to submit the advance fee agreements referred to in Paragraphs 6 through 9 above, to the Commissioner ten days before using them, in violation of Code Section 10085 and Section 2970 of Title 10, California Code of Regulations ("Regulations"). LAVI failed to submit the advance fee agreement, described in paragraph 9 above, to the Commissioner ten days before using it, in violation of Code Section 10085 and Regulation 2970.

11.

The conduct, acts and/or omissions of COLLETTE, as set forth in paragraphs 6 through 9 above, are cause for the suspension or revocation of the licenses and license rights of COLLETTE, pursuant to Code Sections 10085, 10177(d) and/or 10177(g).

12.

The conduct, acts and/or omissions of LAVI, as set forth in paragraphs 9 above, is cause for the suspension or revocation of the licenses and license rights of LAVI, pursuant to Code Sections 10085, 10177(d) and/or 10177(g).

SECOND CAUSE OF ACCUSATION

(License Discipline)

13.

On or about February 9, 2011, COLLETTE was disbarred from the practice of law in California by the Supreme Court of California, in Case No. S188651. The disbarment was based upon a Decision and Order of Involuntary Inactive Enrollment filed by the State Bar Court of California against COLLETTE on October 6, 2010.

14.

The Decision and Order of Involuntary Inactive Enrollment contained factual findings, based upon clear and convincing evidence that COLLETTE failed to maintain client funds in a trust account, COLLETTE misappropriated client funds, COLLETE engaged in unauthorized practice of law in

another jurisdiction and COLLETTE's failed to refund unearned fees paid to EQ.

15.

The allegations set forth in Paragraphs 13 and 14 above constitute cause under Section 10177(f) of the Code for the suspension or revocation of the license and license rights of COLLETTE under the Real Estate Law.

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 the licenses and license rights of Respondents STEPHEN PAUL COLLETTE and RAMIN LAVI under the Real Estate Law, and for such other and further relief as may be proper under other applicable provisions of law.

Dated at Los Angeles, California
this 19 day of May, 2010.

Robin Trujillo
Deputy Real Estate Commissioner

cc: STEPHEN PAUL COLLETTE
RAMIN LAVI
EQ Finance Inc.
Robin Trujillo
Sacto.

JAMES DEMUS, Counsel (SBN 225005)
Department of Real Estate
320 West Fourth St., #350
Los Angeles, CA 90013

(213) 576-6982
(213) 576-6910 (direct)

FILED

DEC 23 2010

DEPARTMENT OF REAL ESTATE
BY: Laura B. Olson

BEFORE THE DEPARTMENT OF REAL ESTATE

STATE OF CALIFORNIA

* * *

In the Matter of the Accusation of STEPHEN PAUL COLLETTE and RAMIN LAVI, Respondents.	No. H-36993 LA A C C U S A T I O N

The Complainant, Robin Trujillo, a Deputy Real Estate Commissioner of the State of California, for cause of Accusation against STEPHEN PAUL COLLETTE and RAMIN LAVI, is informed and alleges as follows:

1.

The Complainant, Robin Trujillo, a Deputy Real Estate Commissioner of the State of California, makes this Accusation in her official capacity.

2.

STEPHEN PAUL COLLETTE, (hereinafter "COLLETTE") is presently licensed and/or has license rights under the Real

Estate Law (Part 1 of Division 4 of the Business and Professions Code, hereinafter "Code"), as a real estate broker.

3.

RAMIN LAVI, (hereinafter "LAVI") is presently licensed and/or has license rights under the Real Estate Law, hereinafter "Code"), as a real estate salesperson.

4.

EQ Group, Inc (hereinafter "EQ"), is not now and has never been licensed by the Department in any capacity. On July 10, 2008, COLLETTE filed Articles of Incorporation with the California Secretary of State, naming COLLETTE as the incorporator and agent for service of process for EQ. On May 1, 2009, COLLETTE submitted a letter to the Department in which he admitted being part owner of EQ and described the loan modification business performed by EQ in detail.

FIRST CAUSE OF ACCUSATION

(Advance Fee Violations)

5.

COLLETTE engaged in the business of a real estate broker in the State of California within the meaning of Code Sections 10131(d) and 10131.2, including brokering mortgage loans and performing loan modification activities and claiming, demanding, charging, receiving, collecting or contracting for the collection of an advance fee, within the meaning of Code Section 10026, including, but not limited to, the following loan modification activities with respect to loans which were secured by liens on real property.

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Joshua Linstrom Transaction

On or about October 28, 2008, Joshua Linstrom signed an agreement on EQ letterhead, authorizing COLLETE "of EQ Group, Inc." to represent her and negotiate on her behalf regarding all matters pertaining to her home loan. EQ also requested and received advance fees of $3,500 from Linstrom for the purpose of performing a loan modification.

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Charlie Clark Transaction

On or about August 4, 2008, Charlie Clark was solicited over telephone by LAVI, regarding loan modification services provided by EQ. On this date, Mr. Clark entered into an agreement for EQ to provide loan modification services for his home loan. Charlie Clark also submitted advance fees of $3,000 to EQ, for the purpose of performing a loan modification, on August 4, 2008. On August 15, 2008, COLLETTE sent a letter to Countrywide loans on EQ letterhead, indicating that he represented Charlie Clark. On November 4, 2008, LAVI sent a letter to Mr. Clark on EQ letterhead, requesting tax returns "in order to finish your loan modification". On April 9, 2009, Charlie Clark received a release agreement from EQ, which would authorize transferring Mr. Clark's advance fees to COLLETTE.

10.

The agreements described in Paragraphs 6 through 9 above, constitute advance fee agreements within the meaning of Code Section 10026. COLLETTE failed to submit the advance fee agreements referred to in Paragraphs 6 through 9 above, to the Commissioner ten days before using them, in violation of Code Section 10085 and Section 2970 of Title 10, California Code of Regulations ("Regulations"). LAVI failed to submit the advance fee agreement, described in paragraph 9 above, to the Commissioner ten days before using it, in violation of Code Section 10085 and Regulation 2970.

11.

The conduct, acts and/or omissions of COLLETTE, as set forth in paragraphs 6 through 9 above, are cause for the suspension or revocation of the licenses and license rights of COLLETTE, pursuant to Code Sections 10085, 10177(d) and/or 10177(g).

12.

The conduct, acts and/or omissions of LAVI, as set forth in paragraphs 9 above, is cause for the suspension or revocation of the licenses and license rights of LAVI, pursuant to Code Sections 10085, 10177(d) and/or 10177(g).

SECOND CAUSE OF ACCUSATION

(Conduct Warranting Denial of a Real Estate License)

13.

On or about June 21, 2010, an Order of Entry of Default, Order Enrolling Inactive and Further Orders were filed against COLLETTE's law license by the State Bar Court of California, in Case No. 09-O-10385-RAH. Among the terms of these Orders was a statement that "the factual allegations set forth in the notice of disciplinary charges have been deemed admitted.".

14.

On or about April 9, 2010, the Notice of Disciplinary Charges was filed in the California State Bar Clerks Office for Los Angeles. Among the factual allegations contained in this notice were charges that COLLETTE failed to maintain client funds in a trust account, COLLETTE misappropriated client funds

and numerous charges regarding COLLETTE's failure to refund unearned fees paid to EQ.

15.

The allegations set forth in Paragraphs 13 and 14 above constitute cause under Section 10177(f) of the Code for the suspension or revocation of the license and license rights of COLLETTE under the Real Estate Law.

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 the licenses and license rights of Respondents STEPHEN PAUL COLLETTE and RAMIN LAVI under the Real Estate Law, and for such other and further relief as may be proper under other applicable provisions of law.

Dated at Los Angeles, California
this 14 day of October, 2010.

Robin Trujillo
Deputy Real Estate Commissioner

cc: STEPHEN PAUL COLLETTE
RAMIN LAVI
EQ Finance Inc.
Robin Trujillo
Sacto.