

Rebollar, Heather@DRE

H-37540 LA (C)

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**From:** Vetrone, Amelia@DRE  
**Sent:** Tuesday, September 25, 2012 11:19 AM  
**To:** Rebollar, Heather@DRE  
**Cc:** Oboyski, Jeff@DRE; Averetta, Darlene@DRE  
**Subject:** Solution One Financial, H-37540 LA

Hi Heather,

Regarding the Stipulation and Agreement in this case that we have for the broker, Jeff Barton, REB#01214188, I have received the refund check for the consumer as required by the Stip.

Thanks,  
Amelia

*Amelia Vetrone  
Real Estate Counsel  
Department of Real Estate  
320 W. 4th Street, Suite 350  
Los Angeles, CA 90013  
(213) 576-6940*

✓  
D. J. Jones

**FILED**

SEP 18 2012

DEPARTMENT OF REAL ESTATE  
BY: A. Mederholt

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BEFORE THE DEPARTMENT OF REAL ESTATE  
STATE OF CALIFORNIA

\* \* \*

In the Matter of the Accusation of	)	NO. H-37540 LA
	)	
SOLUTION ONE FINANCIAL INC.;	)	
JEFF BARTON, individually and	)	
as former designated officer	)	
of Solution One Financial Inc.;	)	
and <u>JERRY ALLEN JONES</u> ,	)	
	)	
Respondents.	)	

ORDER ACCEPTING VOLUNTARY SURRENDER OF REAL ESTATE LICENSE

On September 20, 2011, an Accusation was filed in this matter against, among others, Respondent JERRY ALLEN JONES.

On August 1, 2012, Respondent petitioned the Commissioner to voluntarily surrender his restricted real estate salesperson license pursuant to Section 10100.2 of the Business and Professions Code.

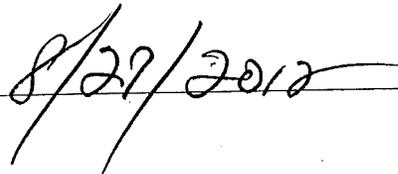
IT IS HEREBY ORDERED that Respondent JERRY ALLEN JONES' petition for voluntary surrender of his restricted real estate salesperson license is accepted as of the effective date of this

1 Order as set forth below, based upon the understanding and  
2 agreement expressed in Respondent's Declaration dated August 1,  
3 2012, (attached as Exhibit "A" hereto). Respondent's license  
4 certificate and pocket card shall be sent to the below listed  
5 address so that they reach the Department on or before the  
6 effective date of this Order:

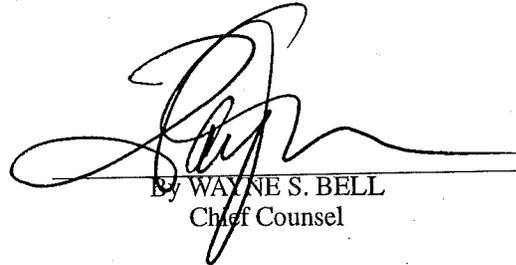
7 Department of Real Estate  
8 Attn: Licensing Flag Section  
9 P.O. Box 187000  
10 Sacramento, CA 95818-7000

11 This Order shall become effective at 12 o'clock noon  
12 on October 8, 2012.

13 IT IS SO ORDERED

14 

15 Real Estate Commissioner

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18 By WAYNE S. BELL  
19 Chief Counsel

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BEFORE THE DEPARTMENT OF REAL ESTATE  
STATE OF CALIFORNIA

\* \* \*

In the Matter of the Accusation of	)	No. H-37540 LA
SOLUTION ONE FINANCIAL INC.;	)	
JEFF BARTON, individually and	)	
as former designated officer	)	
of Solution One Financial Inc.;	)	
and <u>JERRY ALLEN JONES</u> ,	)	
Respondents.	)	

DECLARATION

My name is JERRY ALLEN JONES, and I am currently licensed as a restricted real estate salesperson and/or have license rights with respect to said license. I am represented by attorney Daniel A. Woodford of CENTURY LAW GROUP LLC.

In lieu of proceeding in this matter in accordance with the provisions of the Administrative Procedure Act (Sections 11400 et seq., of the Government Code), I wish to voluntarily surrender my real estate license issued by the

1 Department of Real Estate ("Department"), pursuant to Business  
2 and Professions Code Section 10100.2.

3 I understand that by so voluntarily surrendering my  
4 license, I may be relicensed as a broker or as a salesperson  
5 only by petitioning for reinstatement pursuant to Section 11522  
6 of the Government Code. I also understand that by so  
7 voluntarily surrendering my license, I agree to the following:

8 1. The filing of this Declaration shall be deemed as  
9 my petition for voluntary surrender.

10 2. It shall also be deemed to be an understanding and  
11 agreement by me that I waive all rights I have to require the  
12 Commissioner to prove the allegations contained in the  
13 Accusation filed in this matter at a hearing held in accordance  
14 with the provisions of the Administrative Procedure Act  
15 (Government Code Sections 11400 et seq.), and that I also waive  
16 other rights afforded to me in connection with the hearing such  
17 as the right to discovery, the right to present evidence in  
18 defense of the allegations in the Accusation and the right to  
19 cross-examine witnesses.

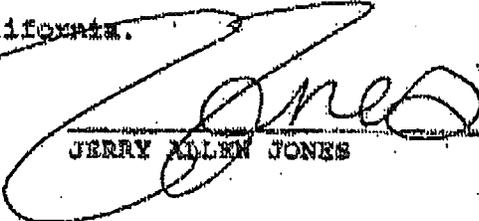
20 3. I further agree that upon acceptance by the  
21 Commissioner, as evidenced by an appropriate order, all  
22 affidavits and all relevant evidence obtained by the Department  
23 in this matter prior to the Commissioner's acceptance, and all  
24 allegations contained in the Accusation filed in the Department  
25 Case No. H-37540 LA, may be considered by the Department to be  
26 true and correct for the purpose of deciding whether to grant  
27 relicensure or reinstatement pursuant to Government Code

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Section 11822.

1. I freely and voluntarily surrender all my licenses and license rights under the Real Estate Law.

I declare under penalty of perjury under the laws of the State of California that the above is true and correct and that this declaration was executed on 8/1, 2012, at Valencia, California.

  
JERRY ALLEN JONES

1 Section 11522.

2 4. I freely and voluntarily surrender all my licenses  
3 and license rights under the Real Estate Law.

4 I declare under penalty of perjury under the laws of  
5 the State of California that the above is true and correct and  
6 that this declaration was executed on \_\_\_\_\_, 2012,  
7 at \_\_\_\_\_, California.

8

9

\_\_\_\_\_  
JERRY ALLEN JONES

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*Handwritten initials/signature*

**FILED**

SEP 18 2012

1 Department of Real Estate  
320 W. 4<sup>TH</sup> Street, Suite 350  
2 Los Angeles, CA 90013-1105  
3 Telephone: (213) 576-6982

DEPARTMENT OF REAL ESTATE  
BY: *[Signature]*

8 BEFORE THE DEPARTMENT OF REAL ESTATE  
9 STATE OF CALIFORNIA

10 \* \* \*

11	In the Matter of the Accusation of	)	No. H-37540 LA
12	SOLUTION ONE FINANCIAL INC.;	)	
13	JEFF BARTON, individually and	)	<u>STIPULATION</u>
14	as former designated officer	)	<u>AND</u>
15	of Solution One Financial Inc.;	)	<u>AGREEMENT</u>
16	and JERRY ALLEN JONES,	)	
	Respondents.	)	

17 It is hereby stipulated by and between Respondent  
18 JEFF BARTON, (sometimes referred to as "Respondent"), and his  
19 attorney of record, Frank M. Buda, of LAW OFFICES OF FRANK M.  
20 BUDA and the Complainant, acting by and through Amelia V.  
21 Vetrone, Counsel for the Department of Real Estate, as follows  
22 for the purpose of settling and disposing of the Accusation filed  
23 on September 20, 2011, in this matter:

- 24 1. All issues which were to be contested and all
- 25 evidence which was to be presented by Complainant and Respondent
- 26 at a formal hearing on the Accusation, which hearing was to be
- 27 held in accordance with the provisions of the Administrative

1 Procedure Act ("APA"), shall instead and in place thereof be  
2 submitted solely on the basis of the provisions of this  
3 Stipulation and Agreement ("Stipulation").

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

8           3. Respondent filed a Notice of Defense pursuant to  
9 Section 11506 of the Government Code for the purpose of  
10 requesting a hearing on the allegations in the Accusation.  
11 Respondent hereby freely and voluntarily withdraws said Notice of  
12 Defense. Respondent acknowledges that he understands that by  
13 withdrawing said Notice of Defense he thereby waives his right to  
14 require the Commissioner to prove the allegations in the  
15 Accusation at a contested hearing held in accordance with the  
16 provisions of the APA and that he will waive other rights  
17 afforded to him in connection with the hearing such as the right  
18 to present evidence in his defense, and the right to cross-  
19 examine witnesses.

20           4. This Stipulation is based on the factual  
21 allegations contained in the Accusation. In the interest of  
22 expedience and economy Respondent chooses not to contest these  
23 allegations but to remain silent and understands that, as a  
24 result thereof, these factual allegations, without being admitted  
25 or denied, will serve as a prima facie basis for the disciplinary  
26 action stipulated to herein. The Real Estate Commissioner shall  
27 not be required to provide further evidence to prove said factual

1 allegations.

2           5. This Stipulation is made for the purpose of  
3 reaching an agreed disposition of this proceeding and is  
4 expressly limited to this proceeding and any other proceeding or  
5 case in which the Department of Real Estate ("Department"), or  
6 another licensing agency of this state, another state, or the  
7 federal government is involved, and otherwise shall not be  
8 admissible in any other criminal or civil proceeding.

9           6. It is understood by the parties that the Real  
10 Estate Commissioner may adopt this Stipulation as his Decision in  
11 this matter thereby imposing the penalty and sanctions on  
12 Respondent's real estate licenses and license rights as set forth  
13 in the below "Order". In the event that the Commissioner in his  
14 discretion does not adopt the Stipulation, the Stipulation shall  
15 be void and of no effect and Respondent shall retain the right to  
16 a hearing and proceeding on the Accusation under the provisions  
17 of the APA and shall not be bound by any stipulation or waiver  
18 made herein.

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

25 ///

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1 responsibilities of a real estate licensee in the State of  
2 California; and

3 b. That no final subsequent determination be made  
4 after hearing or upon stipulation, that cause for disciplinary  
5 action occurred within two (2) years from the effective date of  
6 this Decision. Should such a determination be made, the  
7 Commissioner may, in his discretion, vacate and set aside the  
8 stay order and reimpose all or a portion of the stayed  
9 suspension. Should no such determination be made under this  
10 section, the stay imposed herein shall become permanent.

11 II.

12 Respondent shall, within nine (9) months from the  
13 effective date of this Decision, present evidence satisfactory to  
14 the Real Estate Commissioner that Respondent has, since the most  
15 recent issuance of an original or renewal real estate license,  
16 taken and successfully completed the continuing education  
17 requirements of Article 2.5 of Chapter 3 of the Real Estate Law  
18 for renewal of a real estate license. If Respondent fails to  
19 satisfy this condition, the Commissioner may, in his discretion,  
20 vacate and set aside the stay order and reimpose all or a portion  
21 of the stayed suspension until Respondent presents such evidence.  
22 The Commissioner shall afford Respondent the opportunity for a  
23 hearing pursuant to the Administrative Procedure Act to present  
24 such evidence.

25 III.

26 Respondent shall, within six (6) months after the  
27 effective date of this Decision, take and pass the Professional

1 Responsibility Examination administered by the Department  
2 including the payment of the appropriate examination fee. If  
3 Respondent fails to satisfy this condition, the Commissioner may  
4 order suspension of the restricted license until respondent  
5 passes the examination.

6 IV.

7 All licenses and licensing rights of Respondent JEFF  
8 BARTON are indefinitely suspended unless or until Respondent  
9 provides proof satisfactory to the Commissioner that restitution  
10 of advance fees paid by borrower Amy C. (\$2,995), as described in  
11 the Accusation has been made full. The Department has confirmed  
12 that \$750 of this amount has previously been paid to said  
13 borrower. Respondent shall deliver a cashier's check for \$2,245  
14 made payable to said borrower to Real Estate Counsel Amelia V.  
15 Vetrone who will then forward the check to the consumer.

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DATED: 8-1-12

  
Amelia V. Vetrone, Counsel for  
the Department of Real Estate

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07/31/2012 TUE 17:59 FAX --- Frank Buda

007/008

\* \* \*

EXECUTION OF THE STIPULATION

I have read the stipulation and Agreement. 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 shall (1) mail the original signed signature page of the stipulation herein to Amelia V. Vetrone: Attention: Legal Section, Department of Real Estate, 320 W. Fourth St., Suite 350, Los Angeles, California 90013-1105. Additionally, Respondent shall also (2) facsimile a copy of the signed signature page, to the Department at the following fax number: (213) 576-6917, Attention: Amelia V. Vetrone.

DATED: 8/1/2012

Jeff Barton  
 JEFF BARTON,  
 Respondent

DATED: 8-1-2012

Frank M. Buda  
 Frank M. Buda  
 Counsel for Respondent  
 Approved as to Form

1 \* \* \*

2 EXECUTION OF THE STIPULATION

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

13 Respondent shall (1) mail the original signed signature  
14 page of the stipulation herein to Amelia V. Vetrone: Attention:  
15 Legal Section, Department of Real Estate, 320 W. Fourth St.,  
16 Suite 350, Los Angeles, California 90013-1105. Additionally,  
17 Respondent shall also (2) facsimile a copy of the signed  
18 signature page, to the Department at the following fax number:  
19 (213) 576-6917, Attention: Amelia V. Vetrone.

20  
21 DATED: \_\_\_\_\_

\_\_\_\_\_  
JEFF BARTON,  
Respondent

22  
23  
24  
25 DATED: \_\_\_\_\_

\_\_\_\_\_  
Frank M. Buda  
Counsel for Respondent  
Approved as to Form

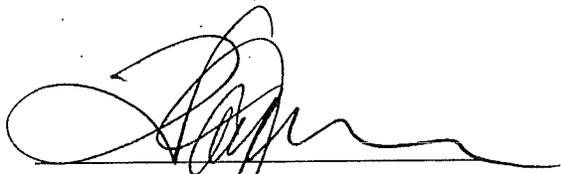
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The foregoing Stipulation and Agreement is hereby  
adopted as my Decision as to Respondent JEFF BARTON and shall  
become effective at 12 o'clock noon on October 8, 2012

IT IS SO ORDERED August 27, 2012.

Real Estate Commissioner



By WAYNE S. BELL  
Chief Counsel

**FILED**

JUN 11 2012

DEPARTMENT OF REAL ESTATE  
BY: *[Signature]*

BEFORE THE DEPARTMENT OF REAL ESTATE

STATE OF CALIFORNIA

\* \* \* \*

In the Matter of the Accusation of )	No. H-37540 LA
)	
<u>SOLUTION ONE FINANCIAL INC.;</u> )	
JEFF BARTON, individually and )	
as former designated officer )	
of Solution One Financial Inc.; )	
and JERRY ALLEN JONES, )	
)	
Respondents. )	
)	

---

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 April 10, 2012, 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 August 1, 2011, 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, to Respondent SOLUTION ONE FINANCIAL INC. ("SOFI") at its address of record on September 20, 2011.

On April 10, 2012, no Notice of Defense having been filed herein on behalf of SOFI within the time prescribed by Section 11506 of the Government Code, Respondent SOFI's default was entered herein.

2.

Respondent SOFI was originally issued a corporate real estate broker license by the Department on March 11, 2006. Said license expired on March 10, 2010. Pursuant to Business and Professions Code ("Code") Section 10103, the Department retains jurisdiction.

3.

At all times relevant herein, Respondent SOFI engaged in the business of, acted in the capacity of, advertised or assumed to act as a real estate broker in the State of California within the meaning of Code Sections 10131(d) and 10131.2. Its activities included soliciting borrowers or lenders for and/or negotiating loans, collecting payments and/or performing services for borrowers or lenders in connection with loans secured by lien on real property. Its activities also included claiming, demanding, charging, receiving, collecting or contracting for the collection of advance fees within the meaning of Code Sections 10026 and 10085.

4.

In or about October, 2008, Respondent SOFI solicited, advertised and collected advance fees from mortgage loan clients in connection with loan modification services. At no time has Respondent SOFI ever submitted any advance fee agreements or other materials to the Department for review and approval as required by Code Section 10085 and Regulation 2970 of Title 10, Chapter 6, California Code of Regulations ("Regulation").

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DETERMINATION OF ISSUES

1.

Cause for disciplinary action against Respondent SOFI exists pursuant to Business and Professions Code Sections 10085, 10176(a), 10176(b), 10176(i), 10177(d), and 10177(g) and Regulation 2970 of Title 10, Chapter 6, California Code of Regulations.

2.

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

ORDER

The license and license rights of Respondent, SOLUTION ONE FINANCIAL INC., 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 JUL - 2, 2012.

DATED: June 4, 2012.

Real Estate Commissioner



By WAYNE S. BELL  
Chief Counsel

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**FILED**

APR 10 2012

DEPARTMENT OF REAL ESTATE  
BY: *R. H. [Signature]*

BEFORE THE DEPARTMENT OF REAL ESTATE  
STATE OF CALIFORNIA

\* \* \*

In the Matter of the Accusation of )	No. H-37540 LA
)	
<u>SOLUTION ONE FINANCIAL INC.;</u> )	
JEFF BARTON, individually and )	<u>DEFAULT ORDER</u>
as former designated officer )	
of Solution One Financial Inc.; )	
and JERRY ALLEN JONES, )	
)	
<u>Respondents.</u> )	

Respondent, SOLUTION ONE FINANCIAL INC., 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 APRIL 10, 2012.

Real Estate Commissioner

*[Signature]*  
By: PHILLIP IHDE  
Regional Manager

*Handwritten initials*

**FILED**

SEP 20 2011

1 AMELIA V. VETRONE, Counsel (SBN# 134612)  
2 Department of Real Estate  
3 320 West Fourth St. #350  
4 Los Angeles, CA 90013  
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DEPARTMENT OF REAL ESTATE  
BY: *R. Medeiros*

(213) 576-6982  
(213) 576-6940 (Direct)

BEFORE THE DEPARTMENT OF REAL ESTATE  
STATE OF CALIFORNIA

\* \* \*

In the Matter of the Accusation of ) No. H-37540 LA  
)  
SOLUTION ONE FINANCIAL INC.; ) A C C U S A T I O N  
JEFF BARTON, individually and )  
as former designated officer )  
of Solution One Financial Inc.; )  
and JERRY ALLEN JONES, )  
)  
)  
)  
Respondents. )

The Complainant, Robin Trujillo, a Deputy Real Estate  
Commissioner, for cause of Accusation against SOLUTION ONE  
FINANCIAL INC.; JEFF BARTON, individually and as former  
designated officer of Solution One Financial Inc.; and JERRY  
ALLEN JONES 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.

///

1 2.

2 Respondent SOLUTION ONE FINANCIAL INC. ("SOFI") is a  
3 California corporation. Respondent JERRY ALLEN JONES is the  
4 President of SOFI. The corporate status of SOFI is currently  
5 stated as "suspended" according to the California Secretary of  
6 State.

7 3.

8 Respondent SOFI is licensed by the Department of Real  
9 Estate ("Department") as a corporate real estate broker. SOFI  
10 was originally licensed by the Department on March 11, 2006, and  
11 expired March 10, 2010. Pursuant to Code Section 10201,  
12 Respondent has a two-year right of renewal. Pursuant to Code  
13 Section 10103, the Department of Real Estate retains  
14 jurisdiction. Respondent JEFF BARTON was the broker-officer  
15 designated pursuant to Business and Professions Code ("Code")  
16 Section 10159.2 to be responsible for ensuring SOFI's compliance  
17 with the Real Estate Law until the corporation's license expired  
18 on March 10, 2010.

19 4.

20 Respondent JEFF BARTON ("BARTON") is licensed by the  
21 Department as a real estate broker. BARTON was originally  
22 licensed by the Department as a broker on September 6, 2000.  
23 Between March 11, 2006 and March 10, 2010, Respondent BARTON was  
24 the designated broker-officer of SOFI. BARTON's main office  
25 address of record with the Department is 6901 Topanga Canyon  
26 Blvd., Suite 205, Canoga Park, CA 91303. From March 7, 2006, to  
27 the present, BARTON's main office address of record with the

1 Department has been 6901 Topanga Canyon Blvd., Suite 205, Canoga  
2 Park, CA 91303. SOFI's main office address with the Department  
3 from June 2, 2007, to March 10, 2010, was 23890 Copper Hill  
4 Drive, #227, Valencia, CA 91354. At all times herein relevant,  
5 BARTON has been the Vice President of SOFI.

6 5.

7 Respondent JERRY ALLEN JONES, ("JONES"), is licensed by  
8 the Department as a restricted real estate salesperson. JONES  
9 was originally licensed by the Department on April 14, 2007, and  
10 his license expires August 23, 2013. Respondent BARTON was  
11 JONES's employing broker from May 24, 2007, to September 13,  
12 2009. Since September 13, 2009, JONES has not been affiliated  
13 with any broker.

14 6.

15 Respondent JONES is the President, and Treasurer of  
16 SOFI. JONES's address of record with the Department is 27548  
17 Sunny Creek Drive, Valencia, CA 91354.

18 7.

19 At all times relevant herein, Respondents engaged in  
20 the business of, acted in the capacity of, advertised or assumed  
21 to act as real estate brokers in the State of California within  
22 the meaning of Code Sections 10131(d) and 10131.2. Their  
23 activities included soliciting borrowers or lenders for and/or  
24 negotiating loans, collecting payments and/or performing services  
25 for borrowers or lenders in connection with loans secured by lien  
26 on real property. Their activities also included claiming,  
27 demanding, charging, receiving, collecting or contracting for the

1 collection of advance fees within the meaning of Code Sections  
2 10026 and 10085.

3 FIRST CAUSE OF ACCUSATION

4 (Advance Fee Violations)

5 8.

6 At all times herein relevant, Respondents solicited,  
7 advertised and collected advance fees from mortgage loan clients  
8 in connection with loan modification services. At no time have  
9 Respondents ever submitted any advance fee agreements or other  
10 materials to the Department for review and approval as required  
11 by Code Section 10085 and Regulation 2970 of Title 10, Chapter 6,  
12 California Code of Regulations ("Regulation").

13 9.

14 On or about October 4, 2008, Respondent JONES  
15 solicited, and collected an advance fee of \$2995 for loan  
16 modification services from homeowner and borrower Amy Calderon  
17 ("Calderon") which services included adjustments to the terms and  
18 conditions of her home loans including, but not limited to,  
19 repayment plans, forbearance plans, partial claims, and reduction  
20 in principal or interest, extenuations, and/or foreclosure  
21 prevention.

22 10.

23 Respondents failed to obtain any loan modification for  
24 Calderon, failed to refund any portion of the advance fee  
25 collected, and has since refused to communicate with Calderon.

26 11.

27 The conduct, acts and omissions of Respondents as set

1 forth above, are cause for the suspension or revocation of the  
2 licenses and license rights of Respondents pursuant to Code  
3 Sections 10176(a), 10176(b), 10176(i), 10177(d), and/or 10177(g).

4 SECOND CAUSE OF ACCUSATION

5 (Failure to Supervise)

6 12.

7 Based on the conduct alleged in paragraphs 8, 9, and  
8 10, above, Respondent BARTON failed to exercise reasonable  
9 supervision over the activities of his corporation and his  
10 employee JONES, to ensure compliance with the Real Estate Law and  
11 the Commissioner's Regulations in violation of Code Section  
12 10159.2 and Regulation 2725.

13 13.

14 The conduct, acts and omissions of Respondent BARTON as  
15 set forth in paragraph 12, above, are cause for the suspension or  
16 revocation of the licenses and license rights of Respondent  
17 BARTON pursuant to Code Sections 10177(d), 10177(g), and/or  
18 10177(h).

19 14.

20 Respondents' activities constitute a course of conduct  
21 which includes the homeowner-borrowers alleged above by way of  
22 example, but is by no means limited to that named consumer and  
23 her real property.

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1                   WHEREFORE, Complainant prays that a hearing be  
2 conducted on the allegations of this Accusation and that upon  
3 proof thereof, a decision be rendered imposing disciplinary  
4 action against all licenses and/or license rights of Respondents  
5 SOLUTION ONE FINANCIAL INC.; JEFF BARTON, individually and as  
6 former designated officer of Solution One Financial Inc.; and  
7 JERRY ALLEN JONES under the Real Estate Law and for such other  
8 and further relief as may be proper under other applicable  
9 provisions of law, including restitution of advanced fees paid  
10 for loan modifications.

11                   Dated at Los Angeles, California, August 1, 2011.

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14                   \_\_\_\_\_  
15                   Robin Trujillo  
16                   Deputy Real Estate Commissioner  
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24 cc: Solution One Financial Inc.  
25       Jeff Barton  
26       Jeffrey Allen Jones  
27       Robin Trujillo  
      Sacto.