

1 demonstrated to my satisfaction that grounds do not presently
2 exist to deny the issuance of an unrestricted real estate
3 broker license to Respondent.

4 NOW, THEREFORE, IT IS ORDERED that Respondent's
5 petition for reinstatement is granted and that an
6 unrestricted real estate broker license be issued to
7 Respondent, JOSEPH EUGENE SULLIVAN, after Respondent
8 satisfies the following conditions within one (1) year from
9 the date of this Order:

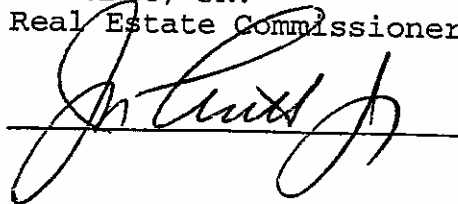
10 1. Submittal of a completed application and
11 payment of the fee for a real estate broker license.

12 2. Submittal of evidence satisfactory to the Real
13 Estate Commissioner that Respondent has, since his present
14 restricted license was last renewed, taken and successfully
15 completed the continuing education requirements of Article
16 2.5 of Chapter 3 of the Real Estate Law for renewal of a real
17 estate license including three hour courses in trust fund
18 accounting and handling and fair housing.

19 This Order shall become effective immediately.

20 DATED: 4/1/98

21
22 JIM ANTT, JR.
23 Real Estate Commissioner

24 

25
26 JOSEPH EUGENE SULLIVAN
27 21 Brookstone
Irvine, California 92604



1 evidence submitted in support thereof. Respondent has failed to
2 demonstrate to my satisfaction that he has undergone sufficient
3 rehabilitation to warrant the reinstatement of his real estate
4 broker license at this time. This determination has been made
5 in light of Respondent's history of acts and conduct which are
6 substantially related to the qualifications, functions and
7 duties of a real estate licensee. That history includes:

8 1. In the Decision of December 23, 1991, in
9 this matter, it was determined that there was cause to revoke or
10 suspend the licenses and license rights of Respondent pursuant
11 to Sections 10176(e) and 10177(d) of the California Business and
12 Professions Code (Code) by reason of his conduct or omissions in
13 violating Section 10145 of the Code and Sections 2830, 2831,
14 2831.2, 2832 and 2832.1 of Chapter 6, Title 10, California Code
15 of Regulations (Regulations) and by his commingling of his own
16 money with trust funds.

17 2. Shortly after his own license was revoked and a
18 restricted license issued Respondent obtained a corporate real
19 estate broker license for Sullivan Properties, Inc. which was
20 the alter ego of Respondent as its sole shareholder, sole
21 director and president.

22 3. As the result of an investigative audit of the
23 books and records of Sullivan Properties, Inc. covering its
24 activities requiring a real estate license it was determined
25 that Respondent's corporation, as of October 31, 1994, was in
26 violation of Sections 2830, 2834 and 2731 of the Regulations and
27 Section 10145 of the Code.

1 4. The history of acts or conduct of Respondent over a
2 number of years in failing to comply with Real Estate Law and
3 his failure to correct business practices with the potential to
4 cause injury to his clients demonstrates a lack of
5 rehabilitation and is reason to deny his petition pursuant to
6 Sections 2911(a) and 2911(j) of the Regulations.
7

8 NOW, THEREFORE, IT IS ORDERED that Respondent's
9 petition for reinstatement of his real estate broker license is
10 hereby denied.

11 This order shall become effective at 12 o'clock noon
12 on August 14, 1995.
13

14 DATED: 7/6/95
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16
17
18 JIM ANTT, JR.
19 Real Estate Commissioner

20 
21

22 JOSEPH EUGENE SULLIVAN
23 24 Birdsong
24 Irvine, California 92714
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JAN 14 1992

DEPARTMENT OF REAL ESTATE
BY C. Berry

DEPARTMENT OF REAL ESTATE
STATE OF CALIFORNIA

* * * * *

In the Matter of the Accusation of)	No. H-1222 SA
)	
JOSEPH EUGENE SULLIVAN,)	L-55214
)	
)	
Respondent.)	

ORDER STAYING EFFECTIVE DATE

On December 23, 1991, a Decision was rendered in the above-entitled matter to become effective January 31, 1992.

IT IS HEREBY ORDERED that the effective date of the Decision of December 23, 1991, is stayed for a period of 30 days.

The Decision of December 23, 1991, shall become effective at 12 o'clock noon on February 28, 1992.

DATED: January 14, 1992

CLARK WALLACE
Real Estate Commissioner

By: Randolph Brendia
RANDOLPH BRENDIA
Regional Manager

1
2 held in accordance with the provisions of the Administrative
3 Procedure Act (APA), shall instead and in place thereof be
4 submitted solely on the basis of the provisions of this
5 Stipulation.

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

10 C. Heretofore, Respondent filed a Notice of Defense
11 pursuant to Section 11505 of the Government Code for the purpose
12 of requesting a hearing on the allegations in the Accusation.
13 Respondent hereby freely and voluntarily withdraws said Notice of
14 Defense. Respondent acknowledges that it understands that by
15 withdrawing said Notice of Defense, Respondent will thereby waive
16 Respondent's right to require the Commissioner to prove the
17 allegations in the Accusation at a contested hearing held in
18 accordance with the provisions of the APA and that Respondent will
19 waive other rights afforded to Respondent in connection with the
20 hearing such as the right to present evidence in defense of the
21 allegations in the Accusation and the right to cross-examine
22 witnesses.

23 D. Respondent admits the factual allegations in
24 Paragraphs I through VIII and XI through XV, inclusive, of the
25 Accusation and stipulates, subject to the limitations set forth
26 below, that the Real Estate Commissioner shall not be required to
27 provide further evidence of such allegations.

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

F. 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 matters which were not specifically alleged to be causes for accusation in this proceeding.

II

DETERMINATION OF ISSUES

By reason of the foregoing stipulations, admissions 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:

A. The acts and omissions of Respondent described in Paragraph VIII of the Accusation violated the Code and the Regulations as set forth below:

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PARAGRAPH

PROVISIONS VIOLATED

VIII (a)	Sec. <u>10145</u>	of the Code, and
	Sec. <u>2830</u>	of the Regulations;
VIII (b)	Sec. <u>10145 (d)</u>	of the Code;
VIII (c)	Sec. <u>2831</u>	of the Regulations;
VIII (d)	Sec. <u>2832.1</u>	of the Regulations.

Each of the foregoing violations separately constitutes cause for the suspension or revocation of all real estate licenses and license rights of Respondent pursuant to the provisions of Section 10177 (d) of the Code.

B. The acts and omissions of Respondent described in Paragraph XIII of the Accusation violated the Code and the Regulations as set forth below:

PARAGRAPH

PROVISIONS VIOLATED

XIII (a)	Sec. 10145	of the Code, and
	Sec. 2830	of the Regulations;
XIII (b)	Sec. 10145 (d)	of the Code;
XIII (c)	Sec. 2831	of the Regulations;
XIII (d)	Sec. 2832.1	of the Regulations;
XIII (e)	Sec. <u>2831.2</u>	of the Regulations;
XIII (f)	Sec. <u>2832</u>	of the Regulations.

Each of the foregoing violations separately constitutes cause for the suspension or revocation of all real estate licenses and license rights of Respondent pursuant to the provisions of Section 10177 (d) of the Code.

C. The acts and omissions of Respondent described in Paragraph XIV of the Accusation constitute cause for the suspension or revocation of all real estate licenses and license rights of Respondent pursuant to the provisions of Section 10176 (e) of the Code.

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D. The acts and omissions of Respondent described in Paragraph XV of the Accusation constitute fraud and dishonest dealing, and are cause for the suspension or revocation of all real estate licenses and license rights of Respondent pursuant to the provisions of Section 10176(i) of the Code.

III
ORDER

WHEREFORE, THE FOLLOWING ORDER is hereby made:

A. The license and license rights of Respondent JOSEPH EUGENE SULLIVAN under the provisions of Part 1 of Division 4 of the Business and Professions Code are hereby revoked;

B. A restricted real estate broker license shall be issued to Respondent if, within 90 days after the effective date of the Decision entered herein, said Respondent makes application for said license and pays to the Department of Real Estate the appropriate fee for said license.

C. The restricted license issued to Respondent SULLIVAN shall be suspended for the thirty (30) day period commencing upon issuance of said restricted license. However, the final twenty (20) days of the thirty-day suspension period shall be stayed upon the condition that no further cause for disciplinary action against the real estate licenses and license rights of such Respondent shall occur within one (1) year after the effective date of the Decision herein. Furthermore, the initial ten (10) day portion of the thirty-day suspension period shall be permanently stayed if, prior to the effective date of the Decision herein, said Respondent petitions pursuant to Section

1
2 10175.2 of the Code and pays to the Real Estate Recovery Account
3 \$250.00 for each day stayed for a maximum of \$2,500.00. The
4 adoption of this provision in the Decision of the Real Estate
5 Commissioner shall constitute a determination that it would not be
6 against the public interest to permit said Respondent to pay a
7 monetary penalty. Payment of the monetary penalty shall be by
8 certified or cashier's check made payable to the Department of
9 Real Estate.

10 D. The restricted license issued to Respondent
11 SULLIVAN shall be subject to all of the provisions of Section
12 10156.7 of the Business and Professions Code and to the following
13 limitations, conditions and restrictions imposed under authority
14 of Section 10156.6 of the Code:

- 15 (1) Respondent shall, within nine (6) months from the effective
16 date of the restricted license, take and pass the
17 Professional Responsibility Examination administered by the
18 Department including the payment of the appropriate
examination fee. If Respondent fails to satisfy this
condition, the Commissioner may order suspension of the
restricted license until Respondent passes the examination.
- 19 (2) Respondent shall, within twelve (12) months of the effective
20 date of the restricted license, present evidence satisfactory
21 to the Real Estate Commissioner that he has, since the most
22 recent issuance of an original or renewal real estate
23 license, taken and successfully completed the continuing
24 education requirements of Article 2.5 of Chapter 3 of the
25 Real Estate Law for renewal of a real estate license. If
26 Respondent fails to satisfy this condition, the Commissioner
27 may order the suspension of the restricted license until the
Respondent presents such evidence. The Commissioner shall
afford Respondent the opportunity for a hearing pursuant to
the Administrative Procedure Act to present such evidence.
- (3) The restricted license may be suspended, prior to a hearing
by Order of the Real Estate commissioner, in the event of
Respondent's conviction or plea of nolo contendere to a crime
which bears a substantial relation to Respondent's fitness or
capacity as a real estate licensee, or upon receipt of
evidence satisfactory to the Real Estate Commissioner that

1 Respondent has violated provisions of the Real Estate Law of
2 the State of California, the Subdivided Lands Act, the Real
3 Estate Regulations of the State of California, or any of the
conditions attached to the restricted license.

4 (4) Respondent shall not be eligible to apply for the issuance of
5 an unrestricted real estate license nor the removal of any of
6 the restrictions, conditions or limitations set forth herein
until one (1) year has elapsed from the date of issuance of
the restricted license to Respondent.

7 (5) For so long as said restricted license shall remain in
8 effect, Respondent shall submit to the Department of Real
9 Estate a Quarterly Trust Funds Position Statement as of the
10 last day of each March, June, September and December. The
11 Position Statement shall cover all trust funds subject to the
12 provisions of Section 10145 of the Code held by Respondent as
13 agent or as trustee. The Position Statement shall be
14 submitted to the District Manager of the Department's Santa
15 Ana office not later than 60 days following the last day of
16 each such calendar quarter. The Position Statement shall
17 include the information and documents specified below and be
18 verified as true and accurate by Respondent under penalty of
19 perjury. If Respondent has no trust fund liability as of the
20 last day of the calendar quarter, the Position Statement
21 shall so state.

22 (a) The Position Statement shall consist of the following
23 information covering the calendar quarter for each trust
24 fund bank account:

25 (i) A statement identifying the account number and the
26 name and address of each trust fund depository.

27 (ii) A schedule of trust fund accountability as of the
last day of the calendar quarter which names each trust
fund beneficiary or principal, states the trust fund
liability to each such beneficiary or principal, and
states the aggregate trust fund liability as of that
day.

(iii) A statement explaining any discrepancy as of the
last day of the calendar quarter between the aggregate
trust fund liability and the balance of the trust fund
bank account adjusted for any uncleared checks drawn on
the account.

(b) The position statement shall be accompanied by the
following supporting documentation covering the calendar
quarter for each trust fund bank account:

(i) A copy of the bank statement covering the last day
of the calendar quarter, a schedule of uncleared checks
drawn on the account as of that day.

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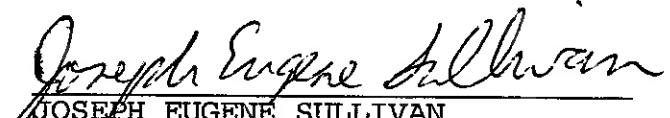
(ii) For each trust fund bank account, a copy of the columnar record in chronological sequence of all entrusted funds received and disbursed maintained by Respondent in compliance with the provisions of Section 2831 of the Regulations, a copy of the separate beneficiary or transactions records maintained in compliance with Section 2831.1 of the Regulations, and a copy of the records of reconciliations produced in compliance with Section 2831.2 of the Regulations.

IV

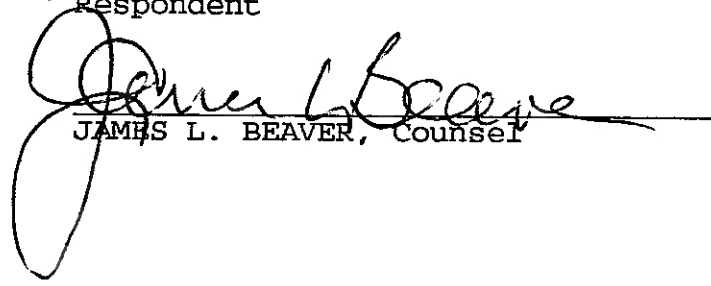
EXECUTION OF STIPULATION

I have read the Stipulation And Agreement In Settlement 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.

DATED: 12/5/91


JOSEPH EUGENE SULLIVAN
Respondent

DATED: 12-5-91


JAMES L. BEAVER, Counsel

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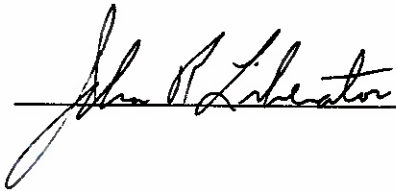
DECISION

The foregoing Stipulation And Agreement In Settlement and Order is hereby adopted as the Decision and Order of the Real Estate Commissioner in the above entitled matter with respect to Respondent JOSEPH EUGENE SULLIVAN.

This Decision shall become effective at 12 o'clock noon on January 31, 1992.

IT IS SO ORDERED December 23, 1991.

CLARK WALLACE
Real Estate Commissioner



SACTO
FLAG

1 James L. Beaver, Counsel
2 Department of Real Estate
3 107 South Broadway, Room 8107
4 Los Angeles, California, 90012
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11 (213) 620-4790

FILED
AUG-5 1991

DEPARTMENT OF REAL ESTATE
BY *Sybil Weems*

BEFORE THE DEPARTMENT OF REAL ESTATE
STATE OF CALIFORNIA

* * * * *

11 In the Matter of the Accusation of) H- 1222 SA
12)
13 JOSEPH EUGENE SULLIVAN,) ACCUSATION
14 doing busines as Sullivan)
15 Properties,)
Respondent.)

16 The Complainant, THOMAS C. MCCRADY, a Deputy Real Estate
17 Commissioner of the State of California, for cause of Accusation
18 against JOSEPH EUGENE SULLIVAN (hereinafter "Respondent"),
19 individually and doing business as Sullivan Properties, is
20 informed and alleges as follows:

21 FIRST CAUSE OF ACCUSATION

22 I

23 Respondent JOSEPH EUGENE SULLIVAN is presently licensed
24 and/or has license rights under the Real Estate Law, Part 1 of
25 Division 4 of the Business and Professions Code (hereinafter "the
26 Code") as an individual real estate broker.

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II

The term "the Regulations" as used herein refers to provisions of Chapter 6, Title 10, California Code of Regulations.

III

The Complainant, THOMAS C. MCCRADY, a Deputy Real Estate Commissioner of the State of California, makes this Accusation against Respondent in his official capacity.

IV

All further references herein to "Respondent" include the party identified in Paragraph I, above, and also include the employees, agents and real estate licensees employed by or associated with said party and who at all times herein mentioned were engaged in the furtherance of the business or operations of said party and who were acting within the course and scope of their authority and employment.

V

At all times herein mentioned, Respondent 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 Section 10131(b) of the Code, including the operation of a property management business with the public wherein, on behalf of others and for compensation or in expectation of compensation, Respondent leased or rented or offered for lease or rent or placed for rent, or solicited for prospective tenants, or collected rents from real property or improvements thereon.

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VI

At all times mentioned herein, in connection with the activities described in Paragraph V, above, Respondent accepted or received funds in trust (herein "trust funds") from or on behalf of actual or prospective parties to property management transactions handled by Respondent and thereafter made disbursement of such funds. From time to time mentioned herein these trust funds were maintained by Respondent in bank accounts, including but not necessarily limited to:

(a) Account number 0640001623 (herein "Sullivan Account #1) held in the name of Joseph E. Sullivan at the University Office of Union Bank, in the City of Fullerton, California;

(b) Account number 0641735287 (herein "Sullivan Account #2) held in the name of "Sullivan Properties" at the University Office of Union Bank, in the City of Fullerton, California;

(c) Account number 0641735279 (herein "Sullivan Account #3) held in the name of "Sullivan Properties" at the University Office of Union Bank, in the City of Fullerton, California;

VII

On or about November 7, 1989, the Department completed an examination of Respondent's books and records pertaining to the property management and trust fund handling activities described in Paragraphs V and VI, above, for the six month period ending September 30, 1989, which revealed violations of the Code and the Regulations as set forth in Paragraph VIII, below.

///
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VIII

In connection with the trust funds described in Paragraph VI, Respondent acted in violation of the Code and the Regulations in that:

(a) Respondent deposited trust funds into Sullivan Accounts #2 and #3, which accounts were not maintained in the name of Respondent as trustee, as required by Section 10145 of the Code and Section 2830 of the Regulations;

(b) Respondent deposited trust funds belonging to more than one beneficiary in Sullivan Accounts #2 and #3, which accounts were interest bearing accounts, without prior written authorization from all said beneficiaries and without accruing the interest for the benefit of said beneficiaries, in violation of Section 10145(d) of the Code;

(c) Respondent failed to maintain an adequate columnar record in chronological order of all trust funds deposited into and disbursed from Sullivan Accounts #2 and #3, as required by Section 2831 of the Regulations;

(d) Respondent disbursed or caused or allowed the disbursement of trust funds from Sullivan Accounts #2 and #3, where the disbursement of said funds reduced the funds in Sullivan Accounts #2 and #3 to an amount which, on September 30, 1989, was approximately \$10,788.31 less than the existing aggregate trust fund liability to all owners of said funds, without first obtaining the written consent of every principal who was an owner of said funds, in violation of Section 2832.1 of the Regulations.

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IX

The acts and omissions of Respondents described in Paragraph VIII, above, violated the Code and the Regulations as set forth below:

<u>PARAGRAPH</u>	<u>PROVISIONS VIOLATED</u>	
VIII (a)	Sec. 10145	of the Code, and
	Sec. 2830	of the Regulations;
VIII (b)	Sec. 10145 (d)	of the Code;
VIII (c)	Sec. 2831	of the Regulations;
VIII (d)	Sec. 2832.1	of the Regulations.

Each of the foregoing violations separately constitutes cause for the suspension or revocation of all real estate licenses and license rights of Respondents pursuant to the provisions of Section 10177 (d) of the Code.

SECOND CAUSE OF ACCUSATION

X

Complainant incorporates herein the allegations of Paragraphs I through IX, inclusive, hereinabove.

XI

On or about February 8, 1990, Respondent received a letter from the Department directing Respondent to correct the violations described in Paragraph VIII and IX, above, advising Respondent that the Department might perform a follow-up examination to determine if the violations had been corrected, and advising that failure to correct the violations might result in suspension or revocation of Respondent's real estate license pursuant to the provisions of Section 10177 (d) of the Code.

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XII

On or about May 15, 1990, the Department completed an examination of Respondent's books and records pertaining to the property management and trust fund handling activities described in Paragraphs V and VI, above, for the seven month period ending April 30, 1990, which revealed violations of the Code and the Regulations as set forth in Paragraphs XIII through XV, below.

XIII

In connection with the trust funds described in Paragraph VI, Respondent acted in violation of the Code and the Regulations in that:

(a) Respondent deposited trust funds into Sullivan Accounts #1, #2 and #3, which accounts were not maintained in the name of Respondent as trustee, as required by Section 10145 of the Code and Section 2830 of the Regulations;

(b) Respondent deposited trust funds belonging to more than one beneficiary in Sullivan Accounts #2 and #3, which accounts were interest bearing accounts, without prior written authorization from all said beneficiaries and without accruing the interest for the benefit of said beneficiaries, in violation of Section 10145(d) of the Code;

(c) Respondent failed to maintain an adequate columnar record in chronological order of all trust funds deposited into and disbursed from Sullivan Accounts #1, #2, #3, as required by Section 2831 of the Regulations;

(d) Respondent disbursed or caused or allowed the disbursement of trust funds from Sullivan Accounts #1, #2 and #3,

1 where the disbursement of said funds reduced the funds in Sullivan
2 Accounts #1, #2 and #3 to an amount which, on April 30, 1990, was
3 approximately \$33,923.35 less than the existing aggregate trust
4 fund liability to all owners of said funds, without first
5 obtaining the written consent of every principal who was an owner
6 of said funds, in violation of Section 2832.1 of the Regulations;

7 (e) With respect to trust funds deposited into Sullivan
8 Accounts #1, #2 and #3, Respondent failed to perform a monthly
9 reconciliation of the receipt and disposition of all such trust
10 funds received by Respondent, and the balance of all separate
11 beneficiary or transaction records, as required by Section 2831.2
12 of the Regulations;

13 (f) Respondent failed to timely deposit trust funds
14 into a neutral escrow depository, into the hands of a principal on
15 whose behalf the funds were received, or into a trust fund account
16 in the name of the broker as trustee, within one business day
17 following receipt of the funds by Respondents, as required by
18 Section 2832 of the Regulations;

19 XIV

20 Respondent deposited Respondent's own money into
21 Sullivan Accounts #1, #2, and #3, thereby commingling Respondent's
22 own money with trust funds described in Paragraph VI, above.

23 XV

24 On or about January 4, 1991, Respondent withdrew \$5,000
25 from funds theretofore held in trust by Respondent in Sullivan
26 Account #2, and deposited said sum into account No. 064176189 held
27 by Respondent as and for the "Sullivan Business Account" at the

1 University Office of Union Bank in the City of Fullerton,
2 California; thereafter Respondent expended said sum for
3 Respondent's expenses, thereby fraudulently converting said sum to
4 the use and benefit of Respondent.

5
6 XVI

7 The acts and omissions of Respondents described in
8 Paragraph XIII, above, violated the Code and the Regulations as
9 set forth below:

<u>PARAGRAPH</u>	<u>PROVISIONS VIOLATED</u>
XIII (a)	Sec. 10145 of the Code, and Sec. 2830 of the Regulations;
XIII (b)	Sec. 10145 (d) of the Code;
XIII (c)	Sec. 2831 of the Regulations;
XIII (d)	Sec. 2832.1 of the Regulations;
XIII (e)	Sec. 2831.2 of the Regulations;
XIII (f)	Sec. 2832 of the Regulations.

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14 Each of the foregoing violations separately constitutes cause for
15 the suspension or revocation of all real estate licenses and
16 license rights of Respondents pursuant to the provisions of
17 Section 10177(d) of the Code.

18
19 XVII

20 The acts and omissions of Respondent described in
21 Paragraph XIV, above, constitute cause for the suspension or
22 revocation of all real estate licenses and license rights of
23 Respondent pursuant to the provisions of Section 10176(e) of the
24 Code.

25 XVIII

26 The acts and omissions of Respondent described in
27 Paragraph XV, above, constitute fraud and dishonest dealing, and

1 are cause for the suspension or revocation of all real estate
2 licenses and license rights of Respondent pursuant to the
3 provisions of Section 10176(i) of the Code.

4 WHEREFORE, Complainant prays that a hearing be conducted
5 on the allegations of this Accusation and that upon proof thereof
6 a decision be rendered imposing disciplinary action against all
7 licenses and license rights of Respondent under the Real Estate
8 Law (Part 1 of Division 4 of the Business and Professions Code)
9 and for such other and further relief as may be proper under other
10 applicable provisions of law.

11
12 Dated at Santa Ana, California
13 this 5th day of August , 1991.

14
15 THOMAS McCRADY
16 THOMAS C. McCRADY
17 Deputy Real Estate Commissioner
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