

DEPARTMENT OF REAL ESTATE

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BEFORE THE DEPARTMENT OF REAL ESTATE

STATE OF CALIFORNIA

In the Matter of the Accusation of 12

No. H-1307 FRESNO

Respondent.

STEVE GEORGE TINETTI,

15 ORDER GRANTING REINSTATEMENT OF LICENSE 16 On February 25, 1997, an Order was rendered herein revoking the real estate broker license of Respondent, but 17 granting Respondent the right to the issuance of a restricted 18 19 real estate broker license. A restricted real estate broker 20 license was issued to Respondent on March 17, 1997, and 21 Respondent has operated as a restricted licensee without cause 2Ż for disciplinary action against Respondent since that time.

23 On February 16, 1999, Respondent petitioned for 24 reinstatement of said real estate broker license, and the Attorney General of the State of California has been given notice 25 of the filing of said petition. 26

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1 I have considered the petition of Respondent and the 2 evidence and arguments in support thereof including Respondent's record as a restricted licensee. Respondent has demonstrated to 3 my satisfaction that Respondent meets the requirements of law for 5 the issuance to Respondent of an unrestricted real estate broker license and that it would not be against the public interest to 6 issue said license to Respondent. 7 - .8. NOW, THEREFORE, IT IS ORDERED that Respondent's petition for reinstatement is granted and that a real estate . 10. broker license be issued to Respondent if Respondent satisfies-the following conditions within nine months from the date of this ·.... 12 Order: Submittal of a completed application and payment of en in 13. En suger rente a su 14 the fee for a real estate broker license. 15,\_ 2. Submittal of evidence of having, since the most . 16 recent issuance of an original or renewal real estate license, 17 taken and successfully completed the continuing education requirements of Article 2.5 of Chapter 3 of the Real Estate Law 18 19 for renewal of a real estate license. 20 This Order shall be effective immediately. brenken. 21 20 DATED: 1999. 22 PAULA REDDISH ZINNEMANN Real Estate Commissioner 23 24 25 26 27

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	1 2	Department of Real Estate P. O. Box 187000 Sacramento, CA 95818-7000
	3	Telephone: (916) 227-0789
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	8	BEFORE THE DEPARTMENT OF REAL ESTATE
	9	STATE OF CALIFORNIA
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	11	In the Matter of the Accusation of ) NO. H-1307 FRESNO
	12	) OAH NO. N-9609093 STEVE GEORGE TINETTI, )
	13	) <u>STIPULATION AND</u> ) <u>AGREEMENT IN</u>
	14	Respondent. ) <u>SETTLEMENT AND ORDER</u>
	15	
	16	It is hereby stipulated by and between Respondent STEVE
	17	GEORGE TINETTI (hereinafter "TINETTI" OR "Respondent"),
	18	individually and by and through Pat Quigley, Esq., Respondent's
	19	attorney of record herein, and the Complainant, acting by and
	20	through James L. Beaver, Counsel for the Department of Real
	21	Estate, as follows for the purpose of settling and disposing of
	22	the Accusation filed on September 5, 1996 in this matter, as
	23	amended by the Amendment to Accusation filed herein on
	24	December 19, 1996 (hereinafter "the Accusation"):
	25	1. All issues which were to be contested and all
	26	evidence which was to be presented by Complainant and Respondent
	27	at a formal hearing on the Accusation, which hearing was to be
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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
 4 Stipulation and Agreement in Settlement.

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 September 12, 1995, Respondent filed a Notice of 9 Defense pursuant to Section 11505 of the Government Code for the 10 purpose of requesting a hearing on the allegations in the 11 Accusation. Respondent hereby freely and voluntarily withdraws 12 said Notice of Defense. Respondent acknowledges that Respondent 13 understands that by withdrawing said Notice of Defense Respondent 14 will thereby waive Respondent's right to require the Commissioner 15 to prove the allegations in the Accusation at a contested hearing 16 held in accordance with the provisions of the APA and that 17 Respondent will waive other rights afforded to Respondent in 18 connection with the hearing such as the right to present evidence 19 in defense of the allegations in the Accusation and the right to 20 cross-examine witnesses. 21

4. Respondent, pursuant to the limitations set forth
below, hereby admits that the factual allegations in Paragraphs I
through VII of the Accusation are true and correct and the Real
Estate Commissioner shall not be required to provide further
evidence to prove such allegations.

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It is understood by the parties that the Real 5. 1 Estate Commissioner may adopt the Stipulation and Agreement as his 2 decision in this matter, thereby imposing the penalty and 3 sanctions on Respondent's real estate license and license rights • 4 as set forth in the "Order" set forth below. In the event that 5 the Commissioner in his discretion does not adopt the Stipulation 6 and Agreement in Settlement, it shall be void and of no effect, 7 and Respondent shall retain the right to a hearing and proceeding. 8 on the Accusation under all the provisions of the APA and shall 9 not be bound by any admission or waiver made herein. 10

6. The Order or any subsequent Order of the Real
Estate Commissioner made pursuant to this Stipulation and
Agreement in Settlement 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.

Respondent understand that by agreeing to this 7. 18 Stipulation and Agreement in Settlement, the findings set forth 19 below in the Determination Of Issues become final, and that the 20 Commissioner may charge said Respondent for the costs of any audit 21 conducted pursuant to Section 10148 of the Business and 22 Professions Code to determine if the violations have been 23 corrected. The maximum costs of said audit will not exceed 24 \$12,020.91. 25

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## DETERMINATION OF ISSUES

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1	DETERMINATION OF ISSUES
2	By reason of the foregoing stipulations, admissions and
3	waivers and solely for the purpose of settlement of the pending
4	Accusation without hearing, it is stipulated and agreed that the
5	following Determination of Issues shall be made:
6	I
7	The acts and/or omissions of Respondent STEVE GEORGE
8	TINETTI as described in Paragraphs VI and VII of the Accusation
9	are cause for the suspension or revocation of the licenses and
10	license rights of Respondent TINETTI under the following
11	provisions of the Code and/or the Regulations:
12	(a) As to Paragraph VI(a) under Section <u>10145</u> of the
13	Code and Section 2830 of the Regulations in conjunction with
14	Section 10177(d) of the Code;
- 15	(b) As to Paragraph VI(b) under Section 10145( <u>d)</u> of the
16	Code in conjunction with Section 10177(d) of the Code;
17	(c) As to Paragraph VI(c) under Section <u>2831.1</u> of the
18	Regulations in conjunction with Section 10177(d) of the Code;
19	(d) As to Paragraph VI(d) under Section <u>2831.2</u> of the
20	Regulations in conjunction with Section 10177(d) of the Code;
21	(e) As to Paragraph VI(e) under Section 2833 of the
22	Regulations in conjunction with Section 10177(d) of the Code;
23	(f) As to Paragraph VI(f) under Section <u>2834(a</u> ) of the
24	Regulations in conjunction with Section 10177(d) of the Code;
25	(g) As to Paragraph VI(g) under Section <u>10176(e)</u> of the
26	Code; and
27	///
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	1	(h) As to Paragraph VII under Section <u>2832.1</u> of the
	2	Regulations in conjunction with Section 10177(d) of the Code.
	3	ORDER
	4	I
	5	All licenses and licensing rights of Respondent STEVE
	6	GEORGE TINETTI under the Real Estate Law are revoked; provided,
	7	however, a restricted real estate broker license shall be issued
	8	to Respondent pursuant to Section 10156.5 of the Business and
	9	Professions Code if, within ninety (90) days from the effective
. 1		date of the Decision entered pursuant to this Order (hereinafter
. 1	11	"the Decision"):
1	.2	(a) Respondent provides proof satisfactory to the Real
1	13	Estate Commissioner that, as of some date, selected by Respondent,
1	.4	subsequent to December 30, 1996, there is on deposit in one or
נ	15	more trust bank accounts for the use and benefit of all owners of
. <b>1</b>	.6	funds entrusted to Respondent an amount or amounts equal to the
1	L7	individual and aggregate trust fund liability of Respondent to
1	18	such owners; and .
. 1	L9	(b) Respondent makes application for the restricted
2	20	license and pays to the Department of Real Estate the appropriate
2	21	fee therefor.
2	22	The restricted license issued to Respondent shall be
2	23	subject to all of the provisions of Section 10156.7 of the
2	24	Business and Professions Code and to the following limitations,
2	25	conditions and restrictions imposed under authority of Section
2	26	10156.6 of that Code:
2	27	///
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 The restricted license issued to Respondent may be suspended prior to hearing by Order of the Real Estate
 Commissioner in the event of Respondent's conviction or plea of nolo contendere to a crime which is substantially related to
 Respondent's fitness or capacity as a real estate licensee.

6 2. The restricted license issued to Respondent may be
7 suspended prior to hearing by Order of the Real Estate
8 Commissioner on evidence satisfactory to the Commissioner that
9 Respondent has violated provisions of the California Real Estate
10 Law, the Subdivided Lands Law, Regulations of the Real Estate
11 Commissioner or conditions attaching to the restricted license.

12 3. Respondent shall not be eligible to apply for the 13 issuance of an unrestricted real estate license nor for the 14 removal of any of the conditions, limitations or restrictions of a 15 restricted license until one (1) year has elapsed from the 16 effective date of this Decision.

Respondent shall, within nine months from the 4. 17 effective date of the Decision, present evidence satisfactory to 18 the Real Estate Commissioner that Respondent has, since the most 19 recent issuance of an original or renewal real estate license, 20 taken and successfully completed the continuing education 21 requirements of Article 2.5 of Chapter 3 of the Real Estate Law 22 for renewal of a real estate license. If Respondent fails to 23 satisfy this condition, the Commissioner may order the suspension 24 of the restricted license until the Respondent presents such 25 evidence. The Commissioner shall afford Respondent the 26 111 27

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opportunity for a hearing pursuant to the Administrative Procedure
 Act to present such evidence.

Respondent shall, within six (6) months from the 5. 3 issuance of the restricted license, take and pass the Professional 4 Responsibility Examination administered by the Department 5 including the payment of the appropriate examination fee. Ιf 6 Respondent fails to satisfy this condition, the Commissioner may 7 order the suspension of the restricted license until Respondent 8 passes the examination. 9

Pursuant to Section 10148 of the Business and б. 10 Professions Code, Respondent shall pay the Commissioner's 11 reasonable cost for an audit to determine if Respondent has 12 corrected the trust fund violation(s) found in paragraph I of the 13 Determination of Issues. In calculating the amount of the 14 Commissioner's reasonable cost, the Commissioner may use the 15 estimated average hourly salary for all persons performing audits 16 of real estate brokers, and shall include an allocation for travel 17 time to and from the auditor's place of work. Respondent shall 18 pay such cost within 45 days of receiving an invoice from the 19 Commissioner detailing the activities performed during the audit 20 and the amount of time spent performing those activities. The 21 Commissioner may suspend the restricted license issued to 22 respondent pending a hearing held in accordance with Section 23 11500, et seq., of the Government Code, if payment is not timely 24 made as provided for herein, or as provided for in a subsequent 25 agreement between the Respondent and the Commissioner. The 26 suspension shall remain in effect until payment is made in full or 27

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until Respondent enters into an agreement satisfactory to the 1 Commissioner to provide for payment, or until a decision providing 2 otherwise is adopted following a hearing held pursuant to this 3 condition. 4

7. Any restricted real estate broker license issued to
8 Respondent may be suspended or revoked for a violation by
7 Respondent of any of the conditions attaching to the restricted
8 license.

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BEAVER, JAMES L. Counsel DEPARTMENT OF REAL ESTATE

I have read the Stipulation and Agreement, and have 13 discussed its terms with my attorney, and its terms are 14 understood by me and are agreeable and acceptable to me. Ι 15 understand that I am waiving rights given to me by the California 16 Administrative Procedure Act (including but not limited to 17 Sections 11506, 11508, 11509, and 11513 of the Government Code), 18 and I willingly, intelligently, and voluntarily waive those 19 rights, including the right of requiring the Commissioner to 20 prove the allegations in the Accusation at a hearing at which I 21 would have the right to cross-examine witnesses against me and to 22 present evidence in defense and mitigation of the charges. 23

24 Annly DATED 25 26

STEVE GEORGE TINETTI

Respondent

STIPULATION OF STEVE GEORGE TINETTI



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. . . I have reviewed the Stipulation and Agreement as to 1 form and content and have advised my client accordingly. 2 3 1491 anary マン 4 PAT OUIGLEY DATED Attorney for Respondent 5 6 The foregoing Stipulation and Agreement for Settlement 7 is hereby adopted by the Real Estate Commissioner as his Decision 8 and Order and shall become effective at 12 o'clock noon on 9 17 March 1997. 10 2 1997. IT IS SO ORDERED 11 JIM ANTT, JR. 12 Real Estate Commissioner 13 14 (ЛЛ 15 16 17 18 19 20 21 22 23 24 25 26 27 STIPULATION OF H-1307 FRESNO 9 COURT PAPER STEVE GEORGE TINETTI STD. 113 (REV. 3-95)

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1	JAMES L. BEAVER, Counsel		
2	P. O. Box 187000 Sacramento, CA 95818-7000		
3	DEPARTMENT OF REAL ESTATE		
4	Telephone: (916) 227-0789		
5	(B) YUNIL YUN		
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7	BEFORE THE DEPARTMENT OF REAL ESTATE		
8	STATE OF CALIFORNIA		
9	* * *		
10	In the Matter of the Accusation of ) No. H-1307 FRESNO		
11	STEVE GEORGE TINETTI, ) OAH No. N-9609093		
12	Respondent. ) <u>AMENDMENT TO ACCUSATION</u> )		
13			
14	The Complainant, Dolores Vazquez-Ramos, a Deputy Real		
15	Estate Commissioner of the State of California, hereby amends the		
16	Accusation filed herein September 5, 1996 (hereinafter "the		
17	Accusation") as follows:		
18	I		
19	The reference in subparagraph (f) of Paragraph VI of the		
20	Accusation to "Section 3834(a)" is hereby amended to refer to		
21	"Section 2834(a)".	)	
22	God 1/2	/	
23	DOLORES VAZQUEZ-RAMOS 7	<b>)</b>	
24	Deputy Real Estate Commissioner		
25	Dated at Fresno, California,		
26	this day of December, 1996.		
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## BEFORE THE DEPARTMENT OF REAL ESTATE STATE OF CALIFORNIA

In the Matter of the Accusation of

STEVE GEORGE TINETTI,

Case No.	H-1307	FRESNO	1
		TUDDIO_	_

OAH No. <u>N-9609093</u>

Respondent

## NOTICE OF HEARING ON ACCUSATION

To the above named respondent:

You are hereby notified that a hearing will be held before the Department of Real Estate at \_\_\_\_\_\_the\_\_\_\_

State Building, 2550 Mariposa Mall, Room #1038, Fresno, CA 93721

		<u></u>	<u>,,</u>	
on	Thursday,	January 23	, 1997	, at the hour of 9:00 AM

or as soon thereafter as the matter can be heard, upon the Accusation served upon you.

You may be present at the hearing. You have the right to be represented by an attorney at your own expense. You are not entitled to the appointment of an attorney to represent you at public expense. You are entitled to represent yourself without legal counsel. If you are not present in person nor represented by counsel at the hearing, the Department may take disciplinary action against you based upon any express admission or other evidence including affidavits, without any notice to you.

You may present any relevant evidence and will be given full opportunity to cross-examine all witnesses testifying against you. You are entitled to the issuance of subpenas to compel the attendance of witnesses and the production of books, documents or other things by applying to the Department of Real Estate.

The hearing shall be conducted in the English language. If you want to offer the testimony of any witness who does not proficiently speak the English language, you must provide your own interpreter. The interpreter must be approved by the Administrative Law Judge conducting the hearing as someone who is proficient in both English and the language in which the witness will testify. You are required to pay the costs of the interpreter unless the Administrative Law Judge directs otherwise.

Dated: October 2, 1996

MENT OF REAL ESTATE nùnsel

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	1	JAMES L. BEAVER, Counsel
	2	P. O. Box 187000 Sacramento, CA 95818-7000
	3	DEPARTMENT OF REAL ESTATE
	4	Telephone: (916) 227-0789
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	6	
	7	BEFORE THE DEPARTMENT OF REAL ESTATE
	8	STATE OF CALIFORNIA
	9	* * *
	10	In the Matter of the Accusation of ) No. H-1307 FRESNO
	11	STEVE GEORGE TINETTI, )
	12	) <u>ACCUSATION</u> Respondent. )
	13	)
	14	The Complainant, Dolores Vazquez-Ramos, a Deputy Real
	15	Estate Commissioner of the State of California, for cause of
	16	Accusation against STEVE GEORGE TINETTI (herein "Respondent"), is
	17	informed and alleges as follows:
	18	I
	19	The Complainant, Dolores Vazquez-Ramos, a Deputy Real
	20	Estate Commissioner of the State of California, makes this
	21	Accusation in her official capacity.
•	22	II.
	23	At all times herein mentioned, Respondent was and now is
	24	licensed and/or has license rights under the Real Estate Law
	25	(Part 1 of Division 4 of the Business and Professions Code)
	26	(hereinafter "the Code") as a real estate broker.
	27	///
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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 within the State of California within the meaning of Sections 10131(a) and 10131(b) of the Code including:

(a) The operation and conduct of a real estate resale 7 brokerage with the public wherein, on behalf of others, for 8 compensation or in expectation of compensation, Respondent sold 9 and offered to sell, bought and offered to buy, solicited 10 prospective sellers and purchases of, solicited and obtained 11 listings of, and negotiated the purchase and sale of real 12 property; and 13

The operation and conduct of a property management (b) 14 business with the public wherein, on behalf of others, for 15 compensation or in expectation of compensation, Respondent leased 16 or rented and offered to lease or rent, and placed for rent, and 17 solicited listings of places for rent, and solicited for 18 prospective tenants of real property or improvements thereon, and 19 collected rents from real property or improvements thereon. 20

IV

In so acting as a real estate broker, as described in 22 Paragraph III, above, Respondent accepted or received funds in trust (hereinafter 'trust funds") from or on behalf of sellers, buyers, lessors, lessees, and others in connection with the resale brokerage and property management activities described in Paragraph III.

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The aforesaid trust funds accepted or received by Respondent were deposited or caused to be deposited by Respondent into one or more bank accounts (hereinafter "trust fund accounts") maintained by Respondent for the handling of trust funds, including, but not necessarily limited to the following accounts maintained by Respondents:

8 (a) The "Tinetti Realty Group Property Management Trust
9 #1", Account Number 0150528254, at the Merced, California, offices
10 of County Bank (hereinafter "Trust 1");

(b) The "Tinetti Realty Group Property Management Trust #2", Account Number 0150528262, at the Merced, California, offices of County Bank (hereinafter "Trust 2");

14 (c) The "Tinetti Realty Group Property Management Trust 15 #3", Account Number 0150528270, at the Merced, California, offices 16 of County Bank (hereinafter "Trust 3");

(d) The "Tinetti Realty Group Trust Account", Account Number 0235-106739, at the Merced, California, offices of Wells Fargo Bank (hereinafter "Trust 4");

(e) The "Tinetti Realty Group Trust Account", Account
Number 0235-108669, at the Merced, California, offices of Wells
Fargo Bank (hereinafter "Trust 5");

(f) The "Tinetti Realty Group Escrow/Commission Split",
Account Number 0150524933, at the Merced, California, offices of
County Bank (hereinafter "Trust 6");

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(g) The "Tinetti Realty Group Escrow Trust Account", 1 Account Number 0150529366, at the Merced, California, offices of County Bank (hereinafter "Trust 7"); and . 3

(h) The "Tinetti Realty Group" account, Account Number 4 693-3-56622, at the Merced, California, offices of First 5 Interstate Bank (hereinafter "Trust 8"). 6

VI

Within the three year period immediately preceding the 8 filing of this Accusation, in connection with the collection and 9 disbursement of said trust funds, Respondent: 10

Failed to place trust funds entrusted to Respondent (a) 11 into the hands of a principal on whose behalf the funds were 12 received, into a neutral escrow depository, or into a trust fund 13 account in the name of Respondent as trustee at a bank or other 14 financial institution, in conformance with the requirements of 15 Section 10145 of the Code and Section 2830 of Chapter 6, Title 10, 16 California Code of Regulations (hereinafter "the Regulations"), in 17 that Respondent deposited such funds into Trust 1, Trust 2, 18 Trust 3, Trust 6, and Trust 7, which accounts were not maintained 19 in the name of Respondent as trustee; 20

(b) Failed to conform to the requirements of Section 21 10145(d) of the Code with respect to the deposit and maintenance 22 of trust funds belonging to several different principals in 23 : Trust 6, an interest-bearing account, in that Trust 6 was not in 24 the name of Respondent as trustee, and Respondent failed to keep 25 funds in the interest-bearing account belonging to each principal 26 separate, distinct and apart from funds belonging to Respondent 27

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and funds belonging to other persons for whom Respondent held funds in trust;

3 (c) Failed to maintain a separate record for each
4 beneficiary or transaction, accounting therein for all said trust
5 funds received, deposited into, and disbursed from Trust 6, in the
6 manner required by Regulation 2831.1;

7 (d) Failed to reconcile, at least once a month, the
8 balance of all separate beneficiary or transaction records with
9 the record of all trust funds received into and disbursed from
10 Trust 1, Trust 3 and Trust 6;

(e) Failed to conform to the requirements of Regulation 2833 with respect to unexplained trust account overages in Trust 1, Trust 3, and Trust 6 by failing to maintain a separate subsidiary ledger to record the potential trust fund liability for such unexplained trust account overages, and by failing to perform a monthly reconciliation of such funds in the manner prescribed by Regulation 2831.2;

(f) Caused, suffered or permitted Nancy Rogers, Dixie Runyon and Sheila Ramsey, unlicensed employees of Respondent without any fidelity bond coverage, to make withdrawals from Trust 6, in violation of the provisions of Section 3834(a) of the Regulations;

(g) Commingled with Respondent's own money or property
funds which had been received and deposited into Trust 6, and were
held by Respondent in trust.

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Within the three year period immediately preceding the 2 filing of this Accusation, in connection with the collection and 3 disbursement of said trust funds, Respondent, without obtaining 4 the prior written consent of the owners of trust funds in Trust 1, 5 Trust 2 and Trust 6 for the reduction of the aggregate balance of 6 trust funds in said accounts to an amount less than the existing 7 aggregate trust fund liability to the owners of said funds: 8 Caused, suffered or permitted the balance of trust (a) 9 funds in Trust 1 to be reduced to an amount which, as of 10 August 31, 1995, was more than \$3,098.68 less than the aggregate 11 liability of Respondent to all owners of such funds; 12 Caused, suffered or permitted the balance of trust (b) 13 funds in Trust 2 to be reduced to an amount which, as of 14 August 31, 1995, was more than \$13,707.24 less than the aggregate 15 liability of Respondent to all owners of such funds; and 16 Caused, suffered or permitted the balance of trust (C) 17 funds in Trust 6 to be reduced to an amount which, as of 18 August 31, 1995, was more than \$4.58 less than the aggregate 19 liability of Respondent to all owners of such funds. 20 VIII 21 The facts alleged above are grounds for the suspension 22 or revocation of the licenses and license rights of Respondent 23 : under the following provisions of the Code and/or the Regulations: 24 (a) As to Paragraph VI(a) under Section 10145 of the 25 \* Code and Section 2830 of the Regulations in conjunction with 26 Section 10177(d) of the Code; 27

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As to Paragraph VI(b) under Section 10145(d) of the (b) 1 Code in conjunction with Section 10177(d) of the Code; 2

As to Paragraph VI(c) under Section 2831.1 of the (c)3 Regulations in conjunction with Section 10177(d) of the Code; 4

(d) As to Paragraph VI(d) under Section 2831.2 of the 5 Regulations in conjunction with Section 10177(d) of the Code; 6

As to Paragraph VI(e) under Section 2833 of the (e) 7 Regulations in conjunction with Section 10177(d) of the Code; 8

(f) As to Paragraph VI(f) under Section 2834(a) of the 9 Regulations in conjunction with Section 10177(d) of the Code; 10

As to Paragraph VI(g) under Section 10176(e) of the (g) 11 Code; and 12

As to Paragraph VII under Section 2832.1 of the (h) 13 Regulations in conjunction with Section 10177(d) of the Code. 14

WHEREFORE, Complainant prays that a hearing be conducted 15 on the allegations of this Accusation and that upon proof thereof 16 a decision be rendered imposing disciplinary action against all 17 licenses and license rights of Respondent, under the Real Estate 18 Law (Part 1 of Division 4 of the Business and Professions Code) 19 and for such other and further relief as may be proper under other 20 provisions of law. 21

22 23 24 Dated at Fresno, California. 25 this 28th day of August, 1996.

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VAZQUEZ-RAMOS DOLORES Deputy Real Estate Commissioner

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