

FILED

APR 24 2010

DEPARTMENT OF REAL ESTATE

[Signature]

BEFORE THE DEPARTMENT OF REAL ESTATE
STATE OF CALIFORNIA

In the Matter of the Accusation of

JEFFREY SCOTT OLSON,

Respondent.

No. H-2797 SD

ORDER DENYING REINSTATEMENT OF LICENSE

On April 30, 2003, a Decision was rendered in Case No. H-2797 SD revoking the real estate broker license of Respondent effective May 27, 2003, but granting Respondent the right to apply for and be issued a restricted real estate broker license. A restricted broker license was issued to Respondent on May 27, 2003.

On February 27, 2009, Respondent petitioned for reinstatement of said real estate broker license, and the Attorney General of the State of California has been given notice of the filing of said petition.

I have considered the petition of Respondent and the evidence submitted in support thereof. Respondent has failed to demonstrate to my satisfaction that Respondent has undergone sufficient rehabilitation to warrant the reinstatement of Respondent's real estate broker license at this time.

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1 The burden of proving rehabilitation rests with the petitioner (*Feinstein v. State*
2 *Bar* (1952) 39 Cal. 2d 541). A petitioner is required to show greater proof of honesty and
3 integrity than an applicant for first time licensure. The proof must be sufficient to overcome the
4 prior adverse judgment on the applicant's character (*Tardiff v. State Bar* (1980) 27 Cal. 3d 395).

5 The Department has developed criteria in Section 2911 of Title 10, California
6 Code of Regulations (Regulations) to assist in evaluating the rehabilitation of an applicant for
7 reinstatement of a license. Among the criteria relevant in this proceeding are:

8 Regulation 2911(k) Correction of business practices resulting in injury to others or
9 with the potential to cause such injury.

10 Respondent has provided no information that he has corrected his business
11 practices which led to the revocation of his license. Although Respondent may now be in
12 compliance with the law, a follow-up audit in 2004 found some of the same violations which led
13 to his license revocation in 2003. A subsequent audit in 2009 also found trust fund handling
14 violations. Respondent must demonstrate complete compliance with trust fund handling and
15 other requirements of the Real Estate Law for a sustained period of time before his petition can
16 be granted.

17 Regulation 2911(l) Significant or conscientious involvement in community,
18 church or privately-sponsored programs designed to provide social benefits or to ameliorate
19 social problems.

20 Respondent has provided no information that he has any significant or
21 conscientious involvement in community or other activities designed to provide social benefits or
22 ameliorate social problems.

23 Given the violations found and the fact that Respondent has not established that
24 Respondent has satisfied Regulations 2911(k) and (l), I am not satisfied that Respondent is
25 sufficiently rehabilitated to receive a real estate broker license.

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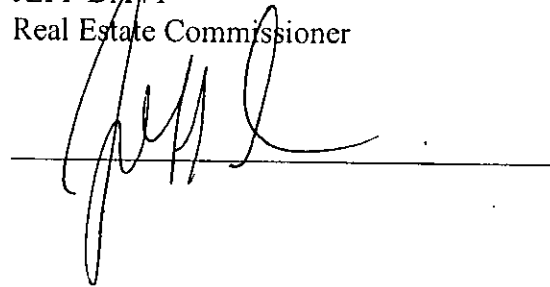
1 NOW, THEREFORE, IT IS ORDERED that Respondent's petition for
2 reinstatement of Respondent's real estate broker license is denied.

3 This Order shall become effective at 12 o'clock noon on MAY 14 2010

4 IT IS SO ORDERED 4-14-2010

5 JEFF DAVI
6 Real Estate Commissioner

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1 Department of Real Estate
2 P. O. Box 187000
3 Sacramento, CA 95818-7000
4 Telephone: (916) 227-0789

FILED
MAY - 6 2003

DEPARTMENT OF REAL ESTATE

By Maricel J. [Signature]

7 BEFORE THE DEPARTMENT OF REAL ESTATE
8 STATE OF CALIFORNIA

9 * * *

10 In the Matter of the Accusation of) No. H-2797 SD
11 JEFFREY SCOTT OLSON,)
12 Respondent.) STIPULATION AND AGREEMENT
13)

14 It is hereby stipulated by and between Respondent
15 JEFFREY SCOTT OLSON dba Advanced Management Services and
16 Eastgate Realty (hereinafter "Respondent"), and the
17 Complainant, acting by and through David A. Peters, Counsel for
18 the Department of Real Estate, as follows for the purpose of
19 settling and disposing of the Accusation filed on January 17,
20 2003 in this matter.

21 1. All issues which were to be contested and all
22 evidence which was to be presented by Complainant and
23 Respondent at a formal hearing on the Accusation, which hearing
24 was to be held in accordance with the provisions of the
25 Administrative Procedure Act (APA), shall instead and in place
26 thereof be submitted solely on the basis of the provisions of
27 this Stipulation and Agreement.

H-2797 SD

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

5 3. On January 29, 2003, Respondent filed a Notice
6 of Defense pursuant to Section 11505 of the Government Code for
7 the purpose of requesting a hearing on the allegations in the
8 Accusation. Respondent hereby freely and voluntarily withdraws
9 said Notice of Defense. Respondent acknowledges that
10 Respondent understands that by withdrawing said Notice of
11 Defense Respondent will thereby waive Respondent's right to
12 require the Commissioner to prove the allegations in the
13 Accusation at a contested hearing held in accordance with the
14 provisions of the APA and that Respondent will waive other
15 rights afforded to Respondent in connection with the hearing
16 such as the right to present evidence in defense of the
17 allegations in the Accusation and the right to cross-examine
18 witnesses.

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

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

12 6. The Order or any subsequent Order of the Real
13 Estate Commissioner made pursuant to this Stipulation and
14 Agreement shall not constitute an estoppel, merger or bar to
15 any further administrative or civil proceedings by the
16 Department of Real Estate with respect to any matters which
17 were not specifically alleged to be cause for accusation in
18 this proceeding.

19 7. Respondent understands that by agreeing to this
20 Stipulation and Agreement, Respondent agrees to pay, pursuant
21 to Section 10148 of the Business and Professions Code, the cost
22 of the audit which led to this disciplinary action. The amount
23 of said cost is \$8,957.00.

24 8. Respondent has received, read, and understands
25 the "Notice Concerning Costs of Subsequent Audits". Respondent
26 understands that by agreeing to this Stipulation and Agreement
27 in Settlement, the findings set forth below in the DETERMINATION

1 OF ISSUES become final, and that the Commissioner may charge
2 Respondent for the cost of any audit conducted pursuant to
3 Section 10148 of the Business and Professions Code to determine
4 if the violations have been corrected. The maximum costs of
5 said audit will not exceed \$8,957.00.

6 DETERMINATION OF ISSUES

7 By reason of the foregoing stipulations, admissions
8 and waivers, and solely for the purpose of settlement of the
9 pending Accusation without hearing, it is stipulated and agreed
10 that the following determination of issues shall be made:

11 I

12 The conduct of Respondent OLSON, as described in the
13 Accusation, constitutes cause for the suspension or revocation
14 of the real estate license and license rights of Respondent
15 under the provisions of Sections 10176(e) and 10177(d) of the
16 California Business and Professions Code ("Code") in conjunction
17 with Sections 10145, 10163, 10148, 10232.4, 10236.4, 10241,
18 10240(a) and 10229(a) of the Code and Sections 2832.1, 2831,
19 2831.1, 2831.2, 2834, 2832, 2835, 2726, 2710(c) and 2715 of
20 Title 10, California Code of Regulations.

21 ORDER

22 A. The real estate broker license and all license
23 rights of Respondent OLSON under the Real Estate Law are
24 revoked.

25 B. A restricted real estate broker license shall be
26 issued to Respondent pursuant to Business and Professions Code
27 Section 10156.5, if Respondent makes application therefor and

1 pays to the Department the appropriate fee for said license
2 within ninety (90) days from the effective date of this Order.

3 C. The restricted license issued to Respondent shall
4 be subject to all the provisions of Section 10156.7 of the
5 Business and Professions Code and to the following limitations,
6 conditions and restrictions imposed under authority of Section
7 10156.6 of said Code:

8 (1) The license shall not confer any property right
9 in the privileges to be exercised, and the Real
10 Estate Commissioner may, by appropriate order
11 suspend the right to exercise any privileges
12 granted under the restricted license in the event
13 of:

14 (a) The conviction of Respondent (including a
15 plea of nolo contendere) to a crime which
16 bears a significant relation to Respondent's
17 fitness or capacity as a real estate
18 licensee; or,

19 (b) The receipt of evidence that Respondent has
20 violated provisions of the California Real
21 Estate Law, Subdivided Lands Law,
22 Regulations of the Real Estate Commissioner
23 or conditions attaching to the restricted
24 license.

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1 (2) Respondent shall not be eligible to apply for
2 issuance of an unrestricted real estate license
3 nor the removal of any of the conditions,
4 limitations or restrictions attaching to the
5 restricted license until four (4) years have
6 elapsed from the date of issuance of a restricted
7 license to Respondent.

8 D. Respondent shall, within nine (9) months from the
9 effective date of this ORDER, present evidence satisfactory to
10 the Real Estate Commissioner that she has, since the most recent
11 issuance of an original or renewal real estate license, taken
12 and successfully completed the continuing education requirements
13 of Article 2.5 of Chapter 3 of the Real Estate Law for renewal
14 of a real estate license. If Respondent fails to satisfy this
15 condition, the Commissioner may order the suspension of the
16 restricted license until Respondent presents such evidence. The
17 Commissioner shall afford Respondent the opportunity for a
18 hearing pursuant to the Administrative Procedure Act to present
19 such evidence.

20 E. Respondent shall, within six (6) months from the
21 effective date of the restricted license, take and pass the
22 Professional Responsibility Examination administered by the
23 Department including the payment of the appropriate examination
24 fee. If Respondent fails to satisfy this condition, the
25 Commissioner may order the suspension of the restricted license
26 until Respondent passes the examination.

27 ///

1 F. Respondent shall, prior to and as a condition of
2 the issuance of the restricted license, submit proof
3 satisfactory to the Commissioner of having taken and
4 successfully completed the continuing education course on trust
5 fund accounting and handling specified in subdivision (a) of
6 Section 10170.5 of the Business and Professions Code. Proof of
7 satisfaction of this requirement includes evidence that
8 respondent has successfully completed the trust fund account and
9 handling continuing education course within 120 days prior to
10 the effective date of the Decision in this matter.

11 G. Pursuant to Section 10148 of the Business and
12 Professions Code, Respondent shall pay the Commissioner's
13 reasonable cost for: a) the audit which led to this
14 disciplinary action, and b) a subsequent audit to determine if
15 Respondent has corrected the trust fund violations found in
16 Paragraph I of the Determination of Issues. In calculating the
17 amount of the Commissioner's reasonable cost, the Commissioner
18 may use the estimated average hourly salary for all persons
19 performing audits of real estate brokers, and shall include an
20 allocation for travel time to and from the auditor's place of
21 work. Respondent shall pay such cost within sixty (60) days of
22 receiving an invoice from the Commissioner detailing the
23 activities performed during the audit and the amount of time
24 spent performing those activities. The Commissioner may suspend
25 the restricted license issued to Respondent pending a hearing
26 held in accordance with Section 11500, et seq., of the
27

1 Government Code, if payment is not timely made as provided for
2 herein, or as provided for in a subsequent agreement between the
3 Respondent and the Commissioner. The suspension shall remain in
4 effect until payment is made in full or until Respondent enters
5 into an agreement satisfactory to the Commissioner to provide
6 for payment, or until a decision providing otherwise is adopted
7 following a hearing held pursuant to this condition.

8 G. Respondent shall prior to the effective date of
9 the Decision provide evidence satisfactory to the Commissioner
10 that Respondent has cured the trust fund shortage alleged in the
11 Accusation.

12 H. Any restricted real estate license issued to
13 Respondent pursuant to this Decision shall be suspended for
14 sixty (60) days from the date of issuance of said restricted
15 license, however, sixty (60) days of said suspension shall be
16 stayed upon the condition that Respondent petitions pursuant to
17 Section 10175.2 of the Business and Professions Code and pays a
18 monetary penalty pursuant to Section 10175.2 of the Business and
19 Professions Code at a rate of \$125.00 for each day of stayed
20 suspension for a total monetary penalty of \$7,500.00:

21 (1) Said payment shall be in the form of a cashier's
22 check or certified check made payable to the Recovery Account of
23 the Real Estate Fund. Said check must be delivered to the
24 Department prior to the effective date of the Decision in this
25 matter.

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1 (2) No further cause for disciplinary action against
2 the real estate license of Respondent occurs within two (2)
3 years form the effective date of the Decision in this matter.

4 (3) If Respondent fails to pay the monetary penalty
5 in accordance with the terms and conditions of the Decision, the
6 Commissioner may, without a hearing, order the immediate
7 execution of all or any part of the stayed suspension in which
8 event the Respondent shall not be entitled to any repayment nor
9 credit, prorated or otherwise, for money paid to the Department
10 under the terms of the Decision.

11 (4) If Respondent pays the monetary penalty and if no
12 further cause for disciplinary action against the real estate
13 license of Respondent occurs within two (2) years from the
14 effective date of the Decision, the stay hereby granted shall
15 become permanent.

16 J. Any restricted real estate broker license issued
17 to Respondent may be suspended or revoked for a violation by
18 Respondent of any of the conditions attaching to the restricted
19 license.

20
21 4/2/03
22 _____ DATED

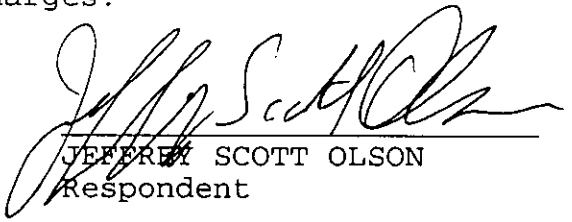
23 _____
24 DAVID A. PETERS, Counsel
25 DEPARTMENT OF REAL ESTATE
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1 * * *

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

13 4-1-03

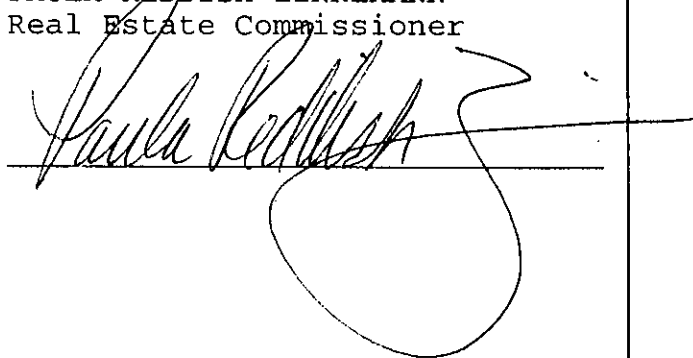
14 DATED

15 
JEFFREY SCOTT OLSON
Respondent

16 * * *

17 The foregoing Stipulation and Agreement for
18 Settlement is hereby adopted by the Real Estate Commissioner as
19 her Decision and Order and shall become effective at 12 o'clock
20 noon on MAY 27, 2003

21 IT IS SO ORDERED

22 
PAULA REDDISH ZINNEMANN
23 Real Estate Commissioner
24 
25
26
27

1 DAVID A. PETERS, Counsel (SBN 99528)
2 Department of Real Estate
3 P. O. Box 187000
4 Sacramento, CA 95818-7000

5 Telephone: (916) 227-0789
6 -or- (916) 227-0781 (Direct)
7

FILED
JAN 17 2003

DEPARTMENT OF REAL ESTATE

By Laurie L. Jan

8 BEFORE THE DEPARTMENT OF REAL ESTATE

9 STATE OF CALIFORNIA

10 * * *

11 In the Matter of the Accusation of)

12 JEFFREY SCOTT OLSON,)

13 Respondent.)

No. H-2797 SD

ACCUSATION

14
15 The Complainant, J. Chris Graves, a Deputy Real Estate
16 Commissioner of the State of California, for cause of accusation
17 against JEFFREY SCOTT OLSON dba Advanced Management Services and
18 Eastgate Realty (hereinafter "Respondent") is informed and
19 alleges as follows:

20 1.

21 The Complainant, J. Chris Graves, a Deputy Real Estate
22 Commissioner of the State of California, makes this Accusation
23 in his official capacity.

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1 2.

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

6 3.

7 At all times herein mentioned, Respondent engaged in
8 the business of, acted in the capacity of, advertised or assumed
9 to act a real estate broker in the State of California, within
10 the meaning of Section 10131(b) of the Code, wherein Respondent
11 for or in expectation of a compensation solicited prospective
12 tenants for, negotiated rental agreements for and collected
13 rents from real properties owned by another or others and
14 otherwise managed real properties.

15 4.

16 At all times herein mentioned, Respondent engaged in
17 the business of, acted in the capacity of, advertised or assumed
18 to act as a real estate broker in the State of California within
19 the meaning of Section 10131(d) of the Code, including the
20 operation and conduct of a mortgage loan brokerage business with
21 the public wherein lenders and borrowers were solicited for
22 loans secured directly or collaterally by liens on real property
23 or a business opportunity, and wherein such loans were arranged,
24 negotiated, processed, and consummated on behalf of others for
25 compensation or in expectation of a compensation. '

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1 5.

2 Beginning on or about August 1, 2002, the Department
3 conducted an audit of Respondent's property management and
4 mortgage loan brokerage activities for the time period of
5 January 1, 2000 and July 31, 2002 as set forth in Audit
6 No. SD 020017/SD 020018 dated October 31, 2002. During the
7 course of the property management activities described in
8 Paragraph 3 above, and the mortgage loan brokerage activities
9 described in Paragraph 4 above, Respondent received and
10 disbursed funds held in trust on behalf of another or others.

11 6.

12 Beginning on or before January 1, 2000 through on or
13 after July 31, 2002, Respondent maintained the following trust
14 fund accounts:

15 <u>TITLE AND ACCOUNT NUMBERS</u>	<u>BANK</u>
16 Advanced Management Services 17 Property Management Trust 18 Account No. 8313605612 (hereinafter "Trust Account #1")	Community First El Cajon, California
19 Olson, Jeff or Olson, Jennifer Real 20 Estate Trust Account Account No. 3720888 (hereinafter "Trust Account #2")	Community First El Cajon, California

21 7.

22 In connection with the receipt and disbursement of
23 trust funds described in Paragraph 5 above, Respondent failed to
24 deposit and maintain trust funds in Trust Account #1 in such
25 manner that as of December 31, 2000, there was a shortage of
26 \$16,865.69 of trust funds.

27 ///

1 8.

2 In connection with the receipt and disbursement of
3 trust funds described in Paragraph 5 above, Respondent failed to
4 deposit and maintain trust funds in Trust Account #1 in such
5 manner that as of July 31, 2002, there was a shortage of
6 \$14,331.30 of trust funds.

7 9.

8 In connection with the receipt and disbursement of
9 trust funds described in Paragraph 5 above, Respondent failed to
10 deposit and maintain trust funds in Trust Account #2 in such
11 manner that as of July 31, 2002, there was a shortage of \$109.00
12 of trust funds.

13 10.

14 Respondent failed to obtain the prior written consent
15 from each of the principals for the reduction of the aggregate
16 trust funds in the accounts described in Paragraph 6 above, to
17 an amount less than the existing aggregate trust fund liability
18 to the owners of said funds as required by Section 2832.1 of
19 Title 10, California Code of Regulations (hereinafter
20 "Regulations").

21 11.

22 In connection with the receipt and disbursement of
23 trust funds described in Paragraph 5 above, Respondent failed to
24 maintain adequate columnar records of all trust funds received
25 and disbursed in the manner required by Section 2831 of the
26 Regulations.

27 ///

12.

In connection with the receipt and disbursement of trust funds described in Paragraph 5 above, Respondent failed to adequately maintain a separate record for each beneficiary or transaction accounting therein for all said trust funds received, deposited, and disbursed in the manner required by Section 2831.1 of the Regulations.

13.

In connection with the receipt and disbursement of trust funds described in Paragraph 5 above, Respondent failed to adequately maintain and perform a reconciliation with the records of all trust funds received and disbursed as required by Section 2831.1 of the Regulations at least once per month, in conformance with Section 2831.2 of the Regulations.

14.

In connection with the receipt and disbursement of trust funds described in Paragraph 5 above, Respondent permitted withdrawals to be made from Trust Account #1 and Trust Account #2 by someone other than a corporate officer, or a salesperson licensed to Respondent and authorized in writing by Respondent to withdraw said funds, or an authorized unlicensed employee covered by a fidelity bond indemnifying Respondent against loss in an amount sufficient to cover the maximum amount of funds to which the employee had access at any time, as required by Section 2834 of the Regulations.

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15.

In connection with the receipt and disbursement of trust funds described in Paragraph 5 above, Respondent failed to maintain Trust Account #2 in the name of Respondent, or a fictitious name in which Respondent was licensed by the Department, as trustee at a bank or other financial institution in violation of Section 10145 of the Code and Section 2832 of the Regulations.

16.

In connection with the receipt and disbursement of trust funds described in Paragraph 5 above, Respondent failed to deposit trust funds accepted on behalf of another, into the hands of the owner of the funds, into a neutral escrow depository or into a trust fund account in the name of Respondent as trustee at a bank or other financial institution no later than three (3) business days following receipt of the funds as required by Section 10145(a) of the Code and Section 2832 of the Regulations.

17.

During the course of the property management activities described in Paragraph 3 above, Respondent commingled his own money with the money of others which was received and held by Respondent in violation of Section 10176(e) of the Code and Section 2835 of the Regulations.

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18.

Within the three year period immediately preceding the filing of this Accusation, Respondent failed to have a written agreement with his salesperson, covering material aspects of the relationship between the parties as required by Section 2726 of the Regulations.

19.

Within the three year period immediately preceding the filing of this Accusation, Respondent operated his real estate business at 1732 Camino Del Sequan, Alpine, California without obtaining a branch office license as required by Section 10163 of the Code, and without filing with the Real Estate Commissioner the address of such branch office as required by Section 2710(c) and Section 2715 of the Regulations.

20.

Respondent failed after a request by a representative of the Real Estate Commissioner to produce all records, papers, books, accounts and documents executed or obtained in connection with transactions for which a real estate license is required. Respondent failed and/or refused to make said records available for inspection and/or failed to retain said records in violation of Section 10148 of the Code.

21.

Respondent in connection with the mortgage loan brokerage activities described in Paragraph 4 above, failed to prepare and deliver to lenders, a written Lender Purchaser Disclosure Statement as required by Section 10232.4 of the Code

1 prior to the lender becoming obligated to make the loan, and/or
2 failed to retain copies of such statements with the records of
3 the company.

4 22.

5 In connection with the mortgage loan brokerage
6 activities described in Paragraph 4 above, Respondent failed to
7 disclose in Mortgage Loan Disclosure Statements all of the
8 information required by Section 10236.4 of the Code.

9 23.

10 In connection with the mortgage loan brokerage
11 activities described in Paragraph 4 above, Respondent failed to
12 present to borrowers, before said borrowers became obligated to
13 complete the loan, a statement with the contents set forth in
14 Section 10241 of the Code, in violation of Section 10240(a) of
15 the Code.

16 24.

17 In connection with the mortgage loan brokerage
18 activities described in Paragraph 4 above, Respondent failed to
19 provide to the Department the Multi-Lender Notification required
20 pursuant to Section 10229(a) of the Code.

21 25.

22 The facts alleged above, are grounds for the
23 suspension or revocation of Respondent's license and/or license
24 rights under the following sections of the Code and Regulations:

25 (1) As to Paragraph 7., under Section 10177(d) of the
26 Code in conjunction with Section 10145 of the Code;

27 ///

1 (2) As to Paragraph 8., under Section 10177(d) of the
2 Code in conjunction with Section 10145 of the Code;
3 (3) As to Paragraph 9., under Section 10177(d) of the
4 Code in conjunction with Section 10145 of the Code;
5 (4) As to Paragraph 10., under Section 10177(d) of
6 the Code in conjunction with Section 2832.1 of the Regulations;
7 (5) As to Paragraph 11., under Section 10177(d) of
8 the Code in conjunction with Section 2831 of the Regulations;
9 (6) As to Paragraph 12., under Section 10177(d) of
10 the Code in conjunction with Section 2831.1 of the Regulations;
11 (7) As to Paragraph 13., under Section 10177(d) of
12 the Code in conjunction with Section 2831.2 of the Regulations;
13 (8) As to Paragraph 14., under Section 10177(d) of
14 the Code in conjunction with Section 2834 of the Regulations;
15 (9) As to Paragraph 15., under Section 10177(d) of
16 the Code in conjunction with Section 10145 of the Code and
17 Section 2832 of the Regulations;
18 (10) As to Paragraph 16., under Section 10177(d) of
19 the Code in conjunction with Section 10145(a) of the Code and
20 Section 2832 of the Regulations;
21 (11) As to Paragraph 17., under Section 10176(e) of
22 the Code and Section 10177(d) of the Code in conjunction with
23 Section 2835 of the Regulations;
24 (12) As to Paragraph 18., under Section 10177(d) of
25 the Code in conjunction with Section 2726 of the Regulations;
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27 ///

1 (13) As to Paragraph 19., under Section 10177(d) of
2 the Code in conjunction with Section 10163 of the Code and
3 Sections 2710(c) and 2715 of the Regulations;

4 (14) As to Paragraph 20., under Section 10177(d) of
5 the Code in conjunction with Section 10148 of the Code;

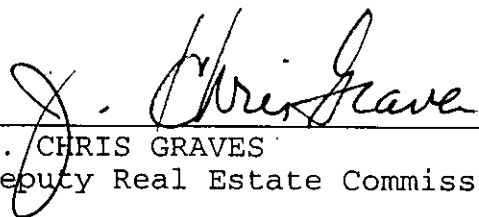
6 (15) As to Paragraph 21., under Section 10177(d) of
7 the Code in conjunction with Section 10232.4 of the Code;

8 (16) As to Paragraph 22., under Section 10177(d) of
9 the Code in conjunction with Section 10236.4 of the Code;

10 (17) As to Paragraph 23., under Section 10177(d) of
11 the Code in conjunction with Sections 10241 and 10240(a) of the
12 Code; and

13 (18) As to Paragraph 24., under Section 10177(d) of
14 the Code in conjunction with Section 10229(a) of the Code.

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

22
23 
24 J. CHRIS GRAVES
Deputy Real Estate Commissioner

25 Dated at San Diego, California,
26 this 14th day of January, 2003.