

1 JUDITH B. VASAN, Counsel (SBN 278115)  
2 Department of Real Estate  
3 320 West 4th Street, Suite 350  
4 Los Angeles, California 90013-1105  
5 Telephone: (213) 576-6982  
6 Direct: (213) 576-6904  
7 Fax: (213) 576-6917  
8 *Attorney for Complainant*

**FILED**  
**MAY 13 2019**  
**DEPT. OF REAL ESTATE**  
By John Aguirre

9 BEFORE THE DEPARTMENT OF REAL ESTATE  
10 STATE OF CALIFORNIA

11 \* \* \*

12 In the Matter of the Accusation against ) No. H-03247 FR  
13 SYNERGY PROPERTY MANAGEMENT, ) ACCUSATION  
14 and HARJINDER PAL SINGH, individually )  
15 and as designated officer of Synergy Property )  
16 Management, )  
17 Respondents. )

18 The Complainant, Brenda Smith, a Supervising Special Investigator of the State  
19 of California, for cause of Accusation against SYNERGY PROPERTY MANAGEMENT and  
20 HARJINDER PAL SINGH, individually and as designated officer of Synergy Property  
21 Management (sometimes referred to as "Respondents") alleges as follows:

22 1.

23 The Complainant, Brenda Smith, a Supervising Special Investigator of the State  
24 of California, makes this Accusation in her official capacity.

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27 2.

1 All references to the "Code" are to the Real Estate Law, Part 1 of Division 4 of  
2 the California Business and Professions Code and all references to "Regulations" are to Title  
3 10, Chapter 6, California Code of Regulations.

4 LICENSE HISTORY

5 (SYNERGY PROPERTY MANAGEMENT)

6 3.

7 a. Respondent SYNERGY PROPERTY MANAGEMENT ("SPM") is presently  
8 licensed and/or has license rights under the Code as a corporate real estate broker, Department  
9 of Real Estate<sup>1</sup> ("Department") license ID 02012941.

10 b. The Department originally issued SPM's corporate broker license on February  
11 14, 2017. SPM's license is scheduled to expire February 13, 2021, unless renewed.

12 c. According to the Department's records to date, SPM's main office address is  
13 3400 Panama Lane, Suite J, in Bakersfield, California.

14 d. SPM's designated officer is Respondent HARJINDER PAL SINGH  
15 ("SINGH")

16 e. According to the Department's records to date, SPM employs one (1)  
17 salesperson, Sanjeev Advani ("Advani"), under its corporate broker license. SPM has been  
18 Advani's employing broker since November 17, 2017.

19 f. Since January 5, 2018, SPM has maintained the authorized fictitious business  
20 names "Synergy Real Estate" and "Synergy Real Estate Team."

21 g. SPM is a California corporation formed on May 5, 2016 (file no. C3904208).  
22 SINGH is SPM's chief executive officer and Advani is the chief financial officer and director.

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27 <sup>1</sup> Between July 1, 2013 and July 1, 2018, the Department of Real Estate operated as the Bureau of Real Estate  
under the Department of Consumer Affairs.

1 (HARJINDER PAL SINGH)

2 4.

3 a. Respondent SINGH is presently licensed and/or has license rights under the  
4 Code as a real estate broker, Department license ID 01402980.

5 b. The Department originally issued SINGH a broker license on June 23, 2009.  
6 SINGH's license is scheduled to expire on June 22, 2021, unless renewed.

7 c. SINGH is the designated officer of Respondent SPM and another corporate  
8 real estate broker, Hero Real Estate, Inc., Department ID 01902111.

9 d. According to the Department records to date, SINGH employs one (1)  
10 salesperson, Kazim Raza Kazmi ("Kazmi") Department license ID 01409638, under SINGH's  
11 individual real estate broker license.

12 e. Since October 4, 2010, SINGH has maintained the authorized fictitious  
13 business name "Hero Real Estate." Since August 26, 2014, SINGH has maintained the  
14 authorized fictitious business name "Nationwide Realty."

15 REAL ESTATE ACTIVITY

16 5.

17 At all times mentioned herein, Respondent SPM engaged in the business of,  
18 acted in the capacity of, advertised or assumed to act as a real estate broker, within the meaning  
19 of Section 10131(b) of the Code. SPM's activities included leasing or renting or offering to  
20 lease or rent, or placing for rent, or soliciting listings of places for rent, or soliciting for  
21 prospective tenants, or negotiating the sale, purchase or exchanges of leases on real property, or  
22 on a business opportunity, or collecting rents from real property on behalf of others for  
23 compensation or in expectation of compensation.

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1 FIRST CAUSE FOR ACCUSATION

2 (AUDIT OF SYNERGY PROPERTY MANAGEMENT – AUDIT NO. FR170029)

3 6.

4 On or about July 6, 2018, the Department completed an audit examination of the  
5 books and records of SPM pertaining to the real estate activities described in Paragraph 5  
6 above. The audit examination covered the period from January 1, 2017, through October 1,  
7 2017 (“audit period”). The primary purpose of the examination was to determine SPM’s  
8 compliance with the Real Estate Law and the Commissioner’s Regulations. The audit  
9 examination revealed violations of the Code and the Regulations as set forth in the following  
10 paragraphs, and more fully discussed in Audit No. FR170029 and the exhibits and work papers  
11 attached to said audit report.

12 7.

13 The Department auditor and special investigator met with SINGH and Advani  
14 on October 30, 2017, at SPM’s main office address at 3400 Panama Lane in Bakersfield,  
15 California. According to Advani, SPM managed twenty-five (25) single-family homes, one (1)  
16 duplex, two (2) four-unit homes, and one (1) commercial building during the audit period. SPM  
17 collected rents, paid expenses, and charged a management fee of 5% to 7% of the rents  
18 collected.

19 8.

20 At all times mentioned herein, and in connection with the property management  
21 activities described in Paragraph 5 above, SPM accepted or received funds, including funds in  
22 trust (“trust funds”) from or on behalf of the owners of the properties managed by SPM, and  
23 thereafter made deposits and/or disbursements of such funds. According to Advani, SPM  
24 maintained two (2) bank accounts for handling of the receipts and disbursements of rents during  
25 the audit period in connection with SPM’s property management activity. The bank accounts  
26 are as follows:

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1 Bank Account #1

2 Bank: Chase  
3 Account Name: Synergy Property Management  
4 Account Number: xxxxxxxx1705  
5 Signatories: Harjinder Pal Singh, Sanjeev Advani, and John Gonzalez (unlicensed by  
6 the Department)  
7 Signatures required: One  
8 Purpose: SPM maintained Bank Account #1 for trust fund handling for property  
9 management activities.

10 Bank Account #2

11 Bank: Chase  
12 Account Name: Synergy Property Management  
13 Account Number: xxxxxxxx2252  
14 Signatories: Harjinder Pal Singh, Sanjeev Advani, and John Gonzalez (unlicensed by  
15 the Department)  
16 Signatures required: One  
17 Purpose: SPM maintained Bank Account #2 for trust fund handling for property  
18 management activities.

19 Audit Violations in Audit No. FR170029

20 9.

21 The audit examination revealed violations of the Code and the Regulations, as  
22 set forth in the following paragraphs, and more fully discussed in Audit No. FR170029 and the  
23 exhibits and work papers attached to the audit report:

24 (a) Trust Account Reconciliation (Regulations section 2831.2). Respondent  
25 SPM failed to accurately reconcile the balance of all separate beneficiary or transaction records  
26 with the record of all trust funds received and disbursed for Bank Account #1 and Bank  
27 Account #2 in violation of Regulations section 2831.2

1                   **(b) Trust Fund Handling (Code section 10145 and Regulations section**  
2 **2832.1)**. According to the bank records provided by SPM for Bank Account #1, as of  
3 September 30, 2017, Bank Account #1 had a shortage of <\$24.00> without evidence that the  
4 owners of the trust funds had given their written consent to allow SPM to reduce the balance of  
5 the funds in Bank Account #1 to an amount less than the existing aggregate trust fund liabilities  
6 in violation of Code section 10145 and Regulations section 2832.1.

7                   **(c) Trust Fund Handling – Account Designation (Code section 10145 and**  
8 **Regulations section 2832)**. Respondent SPM did not designate Bank Account #1 and Bank  
9 Account #2, accounts used to hold trust funds, as trust accounts in the name of SPM as trustee  
10 in violation of Code section 10145 and Regulations section 2832.

11                   **(d) Trust Fund Handling and Trust Account Withdrawals (Code section**  
12 **10145 and Regulations section 2834)**. Based on an examination of the bank signature cards,  
13 Respondent SPM allowed John Gonzalez, who is not licensed by the Department, to make  
14 withdrawals on Bank Account #1 and Bank Account #2 while he was not licensed by the  
15 Department in any capacity and not covered by fidelity bond during the audit period in violation  
16 of Code section 10145 and Regulations section 2834.

17                   **(e) Responsibility of Corporate Officer in Charge (Code section 10159.2)**.

18                   Based on the violations set forth in Paragraphs 9(a)-(d), SINGH failed to  
19 exercise reasonable supervision over the activities of SPM's property management operation  
20 and over its employees, to ensure compliance with the Real Estate Laws and the  
21 Commissioner's Regulations in violation of Code section 10159.2.

22                   10.

23                   Each of the foregoing violations in Paragraphs 9(a)-(d) above constitute cause  
24 for the suspension or revocation of the real estate license and/or license rights of Respondent  
25 SPM under the provisions of Code sections 10177(d), and/or 10177(g).

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ACCUSATION

1 11.

2 The conduct as set forth in Paragraph 9(e) above constitutes cause for the  
3 suspension or revocation of the real estate license and/or license rights of Respondent SINGH  
4 under the provisions of Code sections 10177(d), 10177(g), and/or 10177(h).

5 SECOND CAUSE FOR ACCUSATION

6 (UNLICENSED ACTIVITY OF SYNERGY PROPERTY MANAGEMENT)

7 12.

8 From on or about August 3, 2016, through February 13, 2017, while  
9 incorporated by the California Secretary of State but unlicensed by the Department, Respondent  
10 SPM, and/or any other fictitious business name used by SPM, engaged in the business of, acted  
11 in the capacity of, advertised or assumed to act as a real estate broker, within the meaning of  
12 Code section 10131(b). SPM's activities included the leasing or renting of real property and the  
13 collection of rents and security deposits for real property on behalf of others for compensation  
14 or in expectation of compensation ("property management").

15 13.

16 From on or about August 3, 2016, through January 19, 2017, while unlicensed  
17 by the Department, SPM entered into numerous property management agreements with owners  
18 of real property and entered into numerous lease agreement with tenants in expectation of  
19 compensation. During this period, SPM accepted trust funds in the form of rents and security  
20 deposits for said lease agreements, and accepted trust fund reserves from owners upon  
21 execution of the property management agreements.

22 3004 Stoney Peak Lane

23 14.

24 On or about August 3, 2016, while unlicensed by the Department, Respondent  
25 SPM entered into a Property Management Agreement with the owner of the real property  
26 located at 3004 Stoney Peak Lane in Bakersfield, California. The term of the agreement was  
27 from August 3, 2016, through September 1, 2017. Although page 1 of the agreement listed

1 "Hero Real Estate," the fictitious business name for Respondent SINGH, as the broker,  
2 Paragraph 20 on page 13 of the agreement stated, "SPECIAL PROVISIONS: Synergy Property  
3 Management reserves the right to charge a close out fee on property management services, not  
4 to exceed \$150.00." Moreover, the letterhead of the agreement listed "Synergy Property  
5 Management."

6 15.

7 On or about October 14, 2016, while unlicensed by the Department, Respondent  
8 SPM entered into a Residential Lease Agreement, as the agent for 3004 Stoney Peak Lane with  
9 the new tenants for the tenancy term commencing on October 14, 2016, through November 1,  
10 2017. The prorated amount for the first month's rent was \$774.19. SPM's general ledger for  
11 Bank Account #1 provided to the Department auditor showed an entry for \$774.19 dated  
12 October 14, 2016, for 3004 Stoney Peak Lane with the description "Rent Income."

13 16.

14 On or about October 19, 2016, Respondent SPM collected a commission and  
15 placement fee of \$199.00, and a management fee of \$54.19 for 3004 Stoney Peak Lane. On or  
16 about November 9, 2016, SPM collected a management fee of \$111.17.

17 5208 Barley Harvest Avenue

18 17.

19 On or about September 12, 2016, while unlicensed by the Department,  
20 Respondent SPM entered into a Property Management Agreement with the owner of the real  
21 property located at 5208 Barley Harvest Avenue in Bakersfield, California. The term of the  
22 agreement was from September 12, 2016, through September 12, 2017. Although page 1 of the  
23 agreement listed "Hero Real Estate," the fictitious business name for Respondent SINGH, as  
24 the broker, Paragraph 20 on page 12 of the agreement stated, "SPECIAL PROVISIONS:  
25 Synergy Property Management reserves the right to charge a close out fee on property  
26 management services, not to exceed \$150.00." Moreover, the letterhead of the agreement listed  
27 "Synergy Property Management." SINGH signed the agreement as the broker.



1 18.

2 On or about November 18, 2016, while unlicensed by the Department,  
3 Respondent SPM entered into a Residential Lease Agreement, as the agent for 5208 Barley  
4 Harvest Avenue with the new tenants for the tenancy term commencing on November 18, 2016,  
5 through December 1, 2017. The prorated amount for the first month's rent was \$715.00. SPM's  
6 general ledger for Bank Account #1 provided to the Department auditor showed an entry for  
7 \$715.00 dated November 18, 2016, for 5208 Barley Harvest Avenue with the description "Rent  
8 Income."

9 2817 Crescent Ridge Street

10 19.

11 On or about September 27, 2016, while unlicensed by the Department,  
12 Respondent SPM entered into a Residential Lease Agreement, as the agent for 2817 Crescent  
13 Ridge Street with the new tenant for the tenancy term commencing on September 27, 2016,  
14 through October 1, 2017. The prorated amount for the first month's rent was \$180.00 and the  
15 monthly rent was \$1,350.00. SPM's general ledger for Bank Account #1 provided to the  
16 Department auditor showed an entry for \$180.00 dated September 27, 2016, for 2817 Crescent  
17 Ridge Street with the description "Rent Income" and an entry of \$1,350.00 dated September 27,  
18 2016, with the description "Prepaid Rent Income."

19 8215 Prentice Hall Drive

20 20.

21 On or about October 7, 2016, while unlicensed by the Department, Respondent  
22 SPM entered into a Property Management Agreement with the owner of the real property  
23 located at 8215 Prentice Hall Drive in Bakersfield, California. Although page 1 of the  
24 agreement listed "Hero Real Estate," as the broker, Paragraph 20 on page 12 of the agreement  
25 stated, "SPECIAL PROVISIONS: Synergy Property Management reserves the right to charge a  
26 close out fee on property management services, not to exceed \$150.00." Moreover, the  
27

1 letterhead of the agreement listed "Synergy Property Management." SINGH signed the  
2 agreement as the broker.

3 21.

4 On or about November 18, 2016, while unlicensed by the Department,  
5 Respondent SPM entered into a Residential Lease Agreement, as the agent for 8215 Prentice  
6 Hall Drive with the new tenant for the tenancy term commencing on November 18, 2016,  
7 through December 1, 2017. The prorated amount for the first month's rent was \$758.33 and the  
8 monthly rent was \$1,750.00. The tenant issued a check, check number 1078, in the amount of  
9 \$758.33 payable to SPM. The memo line on the check stated "Nov. Partial Rent." SPM's  
10 general ledger for Bank Account #1 provided to the Department auditor showed an entry for  
11 \$758.33.00 dated November 18, 2016, for 8215 Prentice Hall Drive with the description "Rent  
12 Income."

13 8110 McGraw Hill Drive

14 22.

15 On or about November 14, 2016, while unlicensed by the Department,  
16 Respondent SPM entered into a Property Management Agreement with the owner of the real  
17 property located at 8110 McGraw Hill Drive in Bakersfield, California. The term of the  
18 agreement was from November 15, 2016, through November 15, 2017. Page 1 of the agreement  
19 listed SPM as the broker. The letterhead of the agreement listed "Synergy Property  
20 Management" and SINGH signed as the broker.

21 2623 Van Buren Place

22 23.

23 On or about November 17, 2016, while unlicensed by the Department,  
24 Respondent SPM entered into a Property Management Agreement with the owner of the real  
25 property located at 2623 Van Buren Place in Bakersfield, California. The term of the agreement  
26 was from November 18, 2016, through November 18, 2017. Page 1 of the agreement listed  
27

1 SPM as the broker. The letterhead of the agreement listed "Synergy Property Management."  
2 Advani and SINGH signed as the broker.

3 24.

4 On or about January 19, 2017, while unlicensed by the Department, Respondent  
5 SPM entered into a Residential Lease Agreement as the agent for 2623 Van Buren Place with  
6 the new tenants for the tenancy term commencing on January 19, 2017, through January 31,  
7 2018. SINGH executed the agreement as the property manager.

8 4423 Silver Maple Court

9 25.

10 On or about November 20, 2016, while unlicensed by the Department,  
11 Respondent SPM entered into a Property Management Agreement with the owner of the real  
12 property located at 4423 Silver Maple Court in Bakersfield, California. The term of the  
13 agreement was November 21, 2016, through November 21, 2017. Page 1 of the agreement  
14 listed SPM as the broker. The letterhead of the agreement listed "Synergy Property  
15 Management" and SINGH signed as the broker.

16 5511 Trabucco Canyon Drive

17 26.

18 On or about January 18, 2017, while unlicensed by the Department, Respondent  
19 SPM entered into a Property Management Agreement with the owner of the real property  
20 located at 5511 Trabucco Canyon Drive in Bakersfield, California. The term of the agreement  
21 was from January 18, 2017, through January 18, 2018. Page 1 of the agreement listed SPM as  
22 the broker. The letterhead of the agreement listed "Synergy Property Management" and SINGH  
23 signed as the broker.

24 27.

25 For an unknown period of time, including October 31, 2016, and November 21,  
26 2016, while unlicensed by the Department, SPM advertised online at [www.synergy-pm.com](http://www.synergy-pm.com).  
27 The logo at the top of the main website page identified the business as "Synergy Property

1 Management.” On October 31, 2016, SPM’s website stated, “Synergy Property Management is  
2 a full-service property management and real estate investment team based in Bakersfield,  
3 California. More than a typical property management company, the Synergy team works in both  
4 commercial and residential real estate providing individualized services to meet the needs of  
5 our clients.” On that same date, SPM’s website offered for rent the properties located at 8215  
6 Prentice Hall Drive, 5208 Barley Harvest, and 5913 Brooklyn in Bakersfield, California. On  
7 November 21, 2016, SPM’s website offered for rent the properties located at 8110 McGraw  
8 Hill Drive and 5913 Brooklyn in Bakersfield, California.

9 28.

10 At all times mentioned above in Paragraphs 12 through 27, Respondent SPM  
11 was not licensed in any capacity by the Department. SPM conducted the real estate activities  
12 alleged above in Paragraphs 12 through 27, and expected compensation for such activities in  
13 violation of Code sections 10130 and 10131.

14 29.

15 Each of the foregoing violations above in Paragraphs 12 through 27 constitute  
16 cause for the suspension or revocation of the real estate license and/or license rights of  
17 Respondent SPM under the provisions of Code sections 10177(d) and/or 10177(g).

18 THIRD CAUSE FOR ACCUSATION

19 (AUDIT OF SINGH – AUDIT NO. FR170032)

20 30.

21 At all times mentioned herein, Respondent SINGH engaged in the  
22 business of, acted in the capacity of, advertised or assumed to act as a real estate broker, within  
23 the meaning of Section 10131(b) of the Code. SINGH’s activities included leasing or renting or  
24 offering to lease or rent, or placing for rent, or soliciting listings of places for rent, or soliciting  
25 for prospective tenants, or negotiating the sale, purchase or exchanges of leases on real  
26 property, or on a business opportunity, or collecting rents from real property on behalf of others  
27 for compensation or in expectation of compensation.

ACCUSATION

1 31.

2 On or about July 31, 2018, the Department completed an audit examination of  
3 the books and records of Respondent SINGH, doing business as Nationwide Realty, pertaining  
4 to his property management activities described in Paragraph 30 above. The audit examination  
5 covered the period of time from January 1, 2017, through April 1, 2018 ("audit period"). The  
6 primary purpose of the examination was to determine SINGH's compliance with the Real  
7 Estate Law and the Commissioner's Regulations. The examination revealed violations of the  
8 Code and the Regulations as set forth in the following paragraphs, and more fully discussed in  
9 Audit Report No. FR170032 and the exhibits and work papers attached to said audit report.

10 32.

11 The Department auditor met with SINGH, Kazim Raza Kazmi, and Erika  
12 Hernandez ("Hernandez"). Kazmi is licensed by the Department as a real estate salesperson,  
13 and is the owner of Nationwide Realty. Kazmi's employing broker is SINGH. Hernandez is the  
14 office manager for SINGH. According to SINGH, Kazmi, and Hernandez, SINGH, doing  
15 business as Nationwide Realty, provided property management services during the audit period.  
16 SINGH managed 452 units consisting of 452 properties for approximately 327 owners.

17 33.

18 At all times mentioned herein, and in connection with the property management  
19 activity described in Paragraph 30 above, SINGH accepted or received funds, including trust  
20 funds from or on behalf of the owner of the real property managed by SINGH, and thereafter  
21 made deposits and/or disbursements of such funds. From time-to-time during the audit period,  
22 said trust funds were deposited and/or maintained in the following bank accounts. According to  
23 SINGH, he maintained two (2) trust accounts during the audit period in connection with his  
24 property management activities. The bank accounts are as follows:

25 ///

26 ///

27 ///

1 Trust 1

2 Bank: Chase  
3 Account Name: Nationwide Realty Trust Account  
4 Account Number: xxxxxxxx2609  
5 Signatories: Harjinder Pal Singh, Kazim Raza Kazmi  
6 Purpose: SINGH maintained Trust 1 to handle trust funds related to property  
7 management activities only.

8 Trust 2

9 Bank: Chase  
10 Account Name: Nationwide Realty Trust Account  
11 Account Number: xxxxxxxx8706  
12 Signatories: Harjinder Pal Singh, Kazim Raza Kazmi  
13 Purpose: SINGH maintained Trust 2 to handle trust funds related to property  
14 management activities only.

15 Audit Violations in Audit No. FR170032

16 34.

17 The audit examination revealed violations of the Code and the Regulations, as  
18 set forth in the following paragraphs, and more fully discussed in Audit Report No. FR170032  
19 and the exhibits and work papers attached to the audit report:

20 (a) **Trust Fund Accountability and Balances (Code section 10145 and**  
21 **Regulations sections 2832.1)**. Based on the bank records provided, the auditor prepared bank  
22 reconciliations for Trust 1 for January 31, 2018, February 28, 2018, and March 31, 2018. The  
23 auditor compared the adjusted bank statement to the accountability amount and discovered the  
24 following shortages:

25 Trust 1:

26 Shortage as of January 31, 2018: <\$101,777.57>

27 Shortage as of February 28, 2018: <\$94,000.14>

1 Shortage as of March 31, 2018: <\$84,331.55>

2 The auditor was unable to identify the cause(s) of the trust fund shortages. There  
3 is no evidence that SINGH obtained the written consent of every principal who is an owner of  
4 the funds in Trust 1 prior to each disbursement when such disbursement would reduce the  
5 balance of funds in the account to an amount less than the existing aggregate trust fund liability  
6 of SINGH to all owners of the funds in violation of Regulations section 2832.1.

7 (b) **Trust Fund Record Keeping (Regulations section 2831)**. Based on the  
8 records provided for Trust 1 and Trust 2, SINGH failed to maintain adequate control records for  
9 Trust 1 and Trust 2. The columnar records did not contain all the information regarding all the  
10 deposits, disbursements, and ongoing balances for Trust 1 and Trust 2. SINGH did not maintain  
11 an adequate control record for all trust funds received and disbursed for Trust 1 and Trust 2 in  
12 violation of Regulations section 2831.

13 (c) **Trust Fund Record Keeping for Separate Beneficiaries (Regulations**  
14 **section 2831.1)**. Based on the records provided for Trust 1 and Trust 2, SINGH did not  
15 maintain adequate separate records for Trust 1 and Trust 2. The owner statements for Trust 1  
16 and the columnar record for Trust 2 did not contain all the information regarding all the  
17 deposits, disbursements, and ongoing balances for each property. SINGH failed to maintain  
18 adequate separate records for all trust funds received and disbursed for each property for Trust 1  
19 and Trust 2 in violation of Regulations section 2831.1.

20 (d) **Trust Fund Reconciliation (Regulations section 2831.2)**. Based on the  
21 records provided for Trust 1 and Trust 2, SINGH failed to reconcile the balance of all of the  
22 separate beneficiaries or transaction records with the record of all trust funds received and  
23 disbursed as required for Trust 1 and Trust 2 in violation of Regulations section 2831.2.

24 35.


25 Each of the foregoing violations in Paragraph 34(a)-(d) constitute cause for the  
26 suspension or revocation of the real estate license and/or license rights of Respondent SINGH  
27 under the provisions of Sections 10177(d) and/or 10177(g).





1                   WHEREFORE, Complainant prays that a hearing be conducted on the  
2 allegations of this Accusation and that upon proof thereof, a decision be rendered imposing  
3 disciplinary action against all the licenses and/or license rights of Respondents SYNERGY  
4 PROPERTY MANAGEMENT and HARJINDER PAL SINGH, individually and as designated  
5 officer of Synergy Property Management under the Real Estate Law, for the costs of  
6 investigation and enforcement as permitted by law, for the cost of the audit, and for such other  
7 and further relief as may be proper under other applicable provisions of law.

8  
9 Dated at Fresno, California this 19 day of April, 2019.

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14 Brenda Smith  
15 Supervising Special Investigator  
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25 cc: SYNERGY PROPERTY MANAGEMENT  
26 HARJINDER PAL SINGH  
27 Brenda Smith  
Sacto.  
Audits – Diana Brewster