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FILED

MAY 23 2019

DEPT. OF REAL ESTATE
By *Rogelio Danes*

BEFORE THE DEPARTMENT OF REAL ESTATE
STATE OF CALIFORNIA

In the Matter of the Accusation of

No. H-03249 FR

EB PREFERRED;

ACCUSATION

RALPH DOMENICO SCHIAVONE,
individually and as designated officer of
EB Preferred; and

ETHELE MARIE BARRON,

Respondents.

The Complainant, Brenda Smith, a Supervising Special Investigator of the State of California, for cause of Accusation against EB PREFERRED, RALPH DOMENICO SCHIAVONE, and ETHELE MARIE BARRON, alleges as follows:

1.

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

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2.

All references to the "Code" are to the California Business and Professions Code and all references to "Regulations" are to Title 10, Chapter 6, California Code of Regulations.

DEPARTMENT OF REAL ESTATE LICENSE HISTORY

3.

EB PREFERRED

A. Respondent EB PREFERRED ("EB") is presently licensed and/or has license rights under the Real Estate Law (Part 1 of Division 4 of the Code) as a real estate broker (corporation) ("REC"), California Department of Real Estate ("DRE" or "Department") license ID 01979445.

B. EB was originally licensed by the DRE as a REC on or about December 27, 2017.

C. EB's DRE address of record is: 325 Kern St., Taft, CA 93268.

D. EB has one licensed real estate salesperson ("RES") under its REC license.

E. EB's designated officer ("D.O.") of record is RALPH DOMENICO SCHIAVONE until his officer expiration date of December 26, 2021.

F. EB's DRE license will expire on December 26, 2021.

4.

RALPH DOMENICO SCHIAVONE

A. Respondent RALPH DOMENICO SCHIAVONE ("SCHIAVONE") is presently licensed and/or has license rights under the Real Estate Law (Part 1 of Division 4 of the Code) as a REB, DRE license ID 01158966. SCHIAVONE also holds a Mortgage Loan Originator ("MLO") license endorsement, Nationwide Mortgage Licensing System ("NMLS") ID 350842.

1 B. SCHIAVONE was originally licensed by the DRE as a real estate salesperson
2 ("RES") on or about April 27, 1993, and as a REB on or about September 7, 2001.

3 C. SCHIAVONE's DRE address of record is: 2911 La Vista Avenue, Corona, CA
4 92879.

5 D. SCHIAVONE two DBAs active under his license: HLS and Home Loan
6 Solutions Group, both active as of November 20, 2001.

7 E. SCHIVAONE is the D.O. for EB and for HLS Group Inc (DRE license ID
8 01842164).

9 F. SCHIAVONE's DRE license will expire on September 6, 2021.

10 5.

11 ETHELE MARIE BARRON

12 A. Respondent ETHELE MARIE BARRON ("BARRON") is presently licensed
13 and/or has license rights under the Real Estate Law (Part 1 of Division 4 of the Code) as a
14 restricted RES ("RRES"), DRE license ID 01812075.

15 B. BARRON was originally licensed by the DRE as a RES on or about September
16 19, 2007.

17 C. BARRON's DRE address of record is that same as that of EB.

18 D. On or about February 5, 2015, BARRON's RES license was revoked and
19 BARRON was allowed to apply for and be issued a RRES in DRE Case No. H-02872 FR, for
20 violation of Code Section 10177(g) (negligence).

21 E. BARRON's DRE license will expire on September 6, 2021.

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collects rents from real property, or improvements thereon, or from business opportunities.

(c) Assists or offers to assist in filing an application for the purchase or lease of, or in locating or entering upon, lands owned by the state or federal government.

(d) Solicits borrowers or lenders for or negotiates loans or collects payments or performs services for borrowers or lenders or note owners in connection with loans secured directly or collaterally by liens on real property or on a business opportunity.

(e) Sells or offers to sell, buys or offers to buy, or exchanges or offers to exchange a real property sales contract, or a promissory note secured directly or collaterally by a lien on real property or on a business opportunity, and performs services for the holders thereof.”

8.

Pursuant to Code Section 10132, “A real estate salesperson within the meaning of this part is a natural person who, for a compensation or in expectation of a compensation, is employed by a licensed real estate broker to do one or more of the acts set forth in Sections 10131, 10131.1, 10131.2, 10131.3, 10131.4, and 10131.6.”

Unlawful Employment or Payment of Compensation - Code Section 10137

9.

Pursuant to Code Section 10137, “It is unlawful for any licensed real estate broker to employ or compensate, directly or indirectly, any person for performing any of the acts within the scope of this chapter who is not a license real estate broker, or a real estate salesperson licensed under the broker employing or compensating him or her, or to employ or compensate, directly or indirectly, any licensee for engaging in any activity for which a mortgage loan originator license endorsement is required, if that licensee does not hold a mortgage loan

1 originator license endorsement; provided, however, that a licensed real estate broker may pay a
2 commission to a broker of another state. No real estate salesperson shall be employed by or
3 accept compensation for activity requiring a real estate license from any person other than the
4 broker under whom he or she is at the time licensed. It is unlawful for any licensed real estate
5 salesperson to pay any compensation for performing any of the acts within the scope of this
6 chapter to any real estate licensee except through the broker under whom he or she is at the time
7 licensed. For a violation of any of the provisions of this section, the commissioner may
8 temporarily suspend or permanently revoke the license of the real estate licensee, in accordance
9 with the provisions of this part relating to hearings.”

10 **Trust Fund Handling –**

11 **Code Section 10145 and Regulations 2831, 2831.1, 2831.2, and 2832.1**

12 10.

13 Pursuant to Code Section 10145 *Handling of Trust Funds* (selected portions):

14 “(a)(1): A real estate broker who accepts funds belonging to others in connection
15 with a transaction subject to this part shall deposit all those funds that are not immediately placed
16 into a neutral escrow depository or into the hands of the broker’s principal, into a trust fund
17 account maintained by the broker in a bank or recognized depository in this state. All funds
18 deposited by the broker in a trust account shall be maintained there until disbursed by the broker
19 in accordance with instructions from the person entitled to the funds.

20 (2) Withdrawals may be made from a trust fund account of an individual broker
21 only upon the signature of that broker, or in the case of a corporate broker, only upon the
22 signature of an officer through whom the corporation is licensed pursuant to Section 10158 or
23 10211, or one, or more, of the following persons if specifically authorized in writing by the
24 individual broker or officer:

25 (A) A real estate salesperson licensed to the broker.

1 (B) Another broker acting pursuant to a written agreement with the
2 individual broker that conforms to the requirements of this part and any
3 regulations promulgated pursuant to this part.

4 (C) An unlicensed employee of the individual broker, if the broker has
5 fidelity bond coverage equal to at least the maximum amount of the trust
6 funds to which the unlicensed employee has access at any time. For
7 purposes of this section, bonds providing coverage may be written with a
8 deductible of up to 5 percent of the coverage amount. For bonds with a
9 deductible, the employing broker shall have evidence of financial
10 responsibility that is sufficient to protect members of the public against a
11 loss subject to the deductible amount.

12 Evidence of financial responsibility shall include one or more of the
13 following:

14 (i) Separate fidelity bond coverage adequate to cover the amount
15 of the fidelity bond deductible.

16 (ii) A cash deposit held in a separate account, apart from other
17 funds of the broker, the broker's employees, or the broker's
18 principals, in a bank or recognized depository in this state adequate
19 to cover the amount of the fidelity bond deductible and held
20 exclusively and solely for the purpose of paying the fidelity bond
21 deductible amount.

22 (iii) Any other evidence of financial responsibility approved by the
23 commissioner.

24 (3) An arrangement under which a person enumerated in subparagraph (A),(B),
25 or (C) of paragraph (2) is authorized to make withdrawals from a trust fund account of a broker
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1 shall not relieve an individual broker, nor the broker-officer of a corporate broker licensee, from
2 responsibility or liability as provided by law in handling trust funds in the broker's custody.

3 ...

4 (4)(b) A real estate broker acting as a principal pursuant to Section 10131.1¹
5 shall place all funds received from others for the purchase of real property sales contracts or
6 promissory notes secured directly or collaterally by liens on real property in a neutral escrow
7 depository unless delivery of the contract or notes is made simultaneously with the receipt of the
8 purchase funds.

9 ...

10 (4)(g) The broker shall maintain a separate record of the receipt and disposition of
11 all funds described in subdivisions (a) and (b), including any interest earned on the funds..."

12 11.

13 Pursuant to Regulation 2831 *Trust Fund Records To Be Maintained:*

14 "(a) Every broker shall keep a record of all trust funds received, including
15 uncashed checks held pursuant to instructions of his or her principal. This record, including
16 records maintained under an automated data processing system, shall set forth in chronological
17 sequence the following information in columnar form:

- 18 (1) Date trust funds received.
- 19 (2) From whom trust funds received.
- 20 (3) Amount received.
- 21 (4) With respect to funds deposited in an account, date of said deposit.
- 22 (5) With respect to trust funds previously deposited to an account, check
23 number and date of related disbursement.

24
25 ²Code Section 10131.1 states, "(a) A real state broker within the meaning of this part is also a person who engages as
26 a principal in the business of making loans or buying from, selling to, or exchanging with the public, real property
27 sales contracts or promissory notes secured directly or collaterally by liens on real property..."

1 (6) With respect to trust funds not deposited in an account, identity of other
2 depository and date funds were forwarded.

3 (7) Daily balance of said account.

4 (b) For each bank account which contains trust funds, a record of all trust funds
5 received and disbursed shall be maintained in accordance with subdivision (a) or (c).

6 (c) Maintenance of journals of account cash receipts and disbursements, or similar
7 records, or automated data processing systems, including computer systems and electronic
8 storage and manipulation of information and documents, in accordance with generally accepted
9 accounting principles, shall constitute compliance with subdivision (a) provided that such
10 journals, records, or systems contain the elements required by subdivision (a) and that such
11 elements are maintained in a format that will readily enable tracing and reconciliation in
12 accordance with Section 2831.2.

13 (d) Nothing in this section shall be construed to permit a violation of Section
14 10145 of the Code.

15 (e) A broker is not required to keep records pursuant to this section of checks
16 which are written by a principal, given to the broker and made payable to third parties for the
17 provision of services, including but not limited to escrow, credit and appraisal services, when
18 the total amount of such checks for any transaction from that principal does not exceed \$1,000.
19 Upon request of the Department or the maker of such checks, a broker shall account for the
20 receipt and distribution of such checks. A broker shall retain for three years copies of receipts
21 issued or obtained in connection with the receipt and distribution of such checks."

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12.

Pursuant to Regulation 2831.1 *Separate Record for Each Beneficiary or Transaction*:

“(a) A broker shall keep a separate record for each beneficiary or transaction, accounting for all funds which have been deposited to the broker’s trust bank account and interest, if any, earned on the funds on deposit. The record shall include information sufficient to identify the transaction and the parties to the transaction. Each record shall set forth in chronological sequence the following information in columnar form:

(1) Date of deposit.

(2) Amount of deposit.

(3) Date of each related disbursement.

(4) Check number of each related disbursement.

(5) Amount of each related disbursement.

(6) If applicable, dates and amounts of interest earned and credited to the account.

(7) Balance after posting transactions on any date.

(b) Maintenance of trust ledgers of separate beneficiaries or transactions, or similar records, or automated data processing systems, including computer systems and electronic storage and manipulation of information and documents, in accordance with generally accepted accounting principles will constitute compliance with subdivision (a), provided that such ledgers, records, or systems contain the elements required by subdivision (a) and that such elements are maintained in a format that will readily enable tracing and reconciliation in accordance with Section 2831.2.”

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13.

Pursuant to Regulation 2831.2 *Trust Account Reconciliation*:

“The balance of all separate beneficiary or transaction records maintained pursuant to the provisions of Section 2831.1 must be reconciled with the record of all trust funds received and disbursed required by Section 2831, at least once a month, except in those months when the bank account did not have any activities. A record of the reconciliation must be maintained, and it must identify the bank account name and number, the date of the reconciliation, the account number or name of the principals or beneficiaries or transactions, and the trust fund liabilities of the broker to each of the principals, beneficiaries or transactions.”

14.

Pursuant to Regulation 2832.1 *Trust Fund Handling for Multiple Beneficiaries*:

“The written consent of every principal who is an owner of the funds in the account shall be obtained by a real estate broker prior to each disbursement if such a disbursement will reduce the balance of funds in the account to an amount less than the existing aggregate trust fund liability of the broker to all owners of the funds.”

Responsibility of Corporate Officer in Charge – Code Section 10159.2 and Regulation 2725

15.

Pursuant to Code Section 10159.2 *Responsibility of Corporate Officer in Charge*:

“(a) The officer designated by a corporate broker licensee pursuant to Section 10211 shall be responsible for the supervision and control of the activities conducted on behalf of the corporation by its officers and employees as necessary to secure full compliance with the provisions of this division, including the supervision of salespersons licensed to the corporation in the performance of acts for which a real estate license is required.

(b) A corporate broker licensee that has procured additional licenses in accordance with Section 10158 through officers other than the officer designated pursuant to Section 10211

1 may, by appropriate resolution of its board of directors, assign supervisory responsibility over
2 salespersons licensed to the corporation to its broker-officers.

3 (c) A certified copy of any resolution of the board of directors assigning
4 supervisory responsibility over real estate salespersons licensed to the corporation shall be filed
5 with the Real Estate Commissioner within five days after the adoption or modification thereof.”

6 16.

7 Pursuant to Regulation 2725 *Broker Supervision*:

8 “A broker shall exercise reasonable supervision over the activities of his or her
9 salespersons. Reasonable supervision includes, as appropriate, the establishment of policies,
10 rules, procedures and systems to review, oversee, inspect and manage:

11 (a) Transactions requiring a real estate license.

12 (b) Documents which may have a material effect upon the rights or obligations of
13 a party to the transaction.

14 (c) Filing, storage and maintenance of such documents.

15 (d) The handling of trust funds.

16 (e) Advertising of any service for which a license is required.

17 (f) Familiarizing salespersons with the requirements of federal and state laws
18 relating to the prohibition of discrimination.

19 (g) Regular and consistent reports of licensed activities of salespersons.

20 The form and extent of such policies, rules, procedures and systems shall take into
21 consideration the number of salespersons employed and the number and location of branch
22 offices.

23 A broker shall establish a system for monitoring compliance with such policies,
24 rules, procedures and systems. A broker may use the services of brokers and salespersons to
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1 assist in administering the provisions of this section so long as the broker does not relinquish
2 overall responsibility for supervision of the acts of salespersons licensed to the broker.”

3 **False or Fictitious Business Name – Code Section 10159.5 and Regulation 2731**

4 17.

5 Pursuant to Code Section 10159.5(a)(1), “Every person applying for a license
6 under this chapter who desires to have the license issued under a fictitious business name shall
7 file with his or her application a certified copy of his or her fictitious business name statement
8 filed with the county clerk pursuant to Chapter 5 (commencing with Section 17900) of Part 3 of
9 Division 7.”

10 18.

11 Pursuant to Regulation 2731(a), “A licensee shall not use a fictitious name in the
12 conduct of any activity for which a license is required under the Real Estate Law unless the
13 licensee is the holder of a license bearing the fictitious business name.”

14 **Further Grounds for Disciplinary Action – Code Section 10177**

15 19.

16 Pursuant to Code Section 10177, “The commissioner may suspend or revoke the
17 license of a real estate licensee, delay the renewal of a license of a real estate licensee, or deny the
18 issuance of a license to an applicant, who has done any of the following:

19 ...

20 (d) Willfully disregarded or violated the Real Estate Law (Part 1 (commencing
21 with Section 10000)) or Chapter 1 (commencing with Section 11000) of Part 2 or the rules and
22 regulations of the commissioner for the administration and enforcement of the Real Estate Law
23 and Chapter 1 (commencing with Section 11000) of Part 2.”

24 ...

1 (g) Demonstrated negligence or incompetence in performing an act for which he
2 or she is required to hold a license...”

3 **FIRST CAUSE FOR DISCIPLINE**

4 **DRE AUDIT LA FR170087: EB PREFERRED**

5 **(PROPERTY MANAGEMENT ACTIVITIES)**

6 20.

7 On July 2, 2018, the DRE completed its audit examinations of the books and
8 records of Respondent EB pertaining to its property management activities (FR170087), which
9 require a real estate license. The audit examination covered a period of time beginning on
10 December 27, 2017 and ending on March 31, 2018 (“audit examination period” or “audit
11 period”), and was performed on April 25, 2018. The final report of July 2, 2018 revealed
12 violations of the Code and the Regulations as set forth in the following paragraphs, and more
13 fully discussed in the Audit Report for FR170087.

14 21.

15 **Trust Account**

16 During the audit period, EB a trust account at Bank of America, account number
17 #####5565 (Trust Account #1). The DRE auditor performed a bank reconciliation as of
18 March 31, 2018 for Trust Account #1.

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22.

In the course of property management activities and during the audit examination period described in Paragraph 20, Respondent EB violated the Code and the Regulations, as described below:

Trust Fund Handling for Multiple Beneficiaries

(Code Section 10145 and Regulation 2832.1)

As of March 31, 2018, there was a shortage of <\$591.85> in Trust Account #1 due to bank fees, in violation of **Code Section 10145 and Regulation 2832.1**. The shortage amount is comprised of \$197.35 in bank fees during the audit period and \$394.50 in bank fees prior to the audit period. Because D.O. SCHIAVONE maintained the same trust account for property management activities conducted under his individual REB license and for those activities conducted under EB, the DRE auditor received bank statements for 2017 showing the bank fees. On April 25, 2018, D.O. SCHIAVONE deposited \$791.85 into Trust Account #1 to cure the <\$591.85> shortage and to have an additional \$200.00 in broker funds for future bank uses.

24.

Trust Fund Handling – Trust Account Reconciliation

(Code Section 10145 and Regulation 2831.2)

During the audit period, EB failed to perform and maintain a monthly reconciliation comparing the balance of all separate beneficiary records to the balance of the record of all trust funds received and disbursed (control record) for Trust Account #1, in violation of **Code Section 10145 and Regulation 2831.2.**

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25.

Separate Records for Each Beneficiary or Transaction

(Code Section 10145 and Regulation 2831.1)

During the audit period, EB did not maintain a separate set of records for each beneficiary in chronological sequence and columnar form for Trust Account #1, as well as a separate record for the "unidentified/unaccounted for funds" (\$159.82) held in Trust Account #1, in violation of Code Section 10145 and Regulation 2831.1.

26.

Trust Fund Records To Be Maintained

(Code Section 10145 and Regulation 2831)

27.

During the audit period, EB did not maintain record for Trust Account #1 for all trust funds received and disbursed in chronological sequence, in violation of Code Section 10145 and Regulation 2831.

SECOND, THIRD AND FOURTH CAUSES FOR DISCIPLINE

DRE BROKER OFFICE SURVEY OF 4/25/18: EB PREFERRED

28.

On April 25, 2018, DRE Special Investigator Araceli Amezola ("SI Amezola") arrived at EB's offices in Taft, California to perform a broker office survey ("BOS"). SI Amezola interviewed BARRON, Corenna Rose (non-licensee) ("Rose"), and SCHIAVONE, and examined EB's property management and lease agreements.

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29.

Use of False or Fictitious Business Names

(Code Section 10159.5 and Regulation 2731)

A. SI Amezola requested to examine some of EB's contracts during the BOS. Three (3) lease agreements and three (3) property management agreements were provided by Rose to SI Amezola for review, all of which had been signed and dated by BARRON within the last year. Rose indicated that the agreements had already been revised by D.O. SCHIAVONE.

B. EB used different names for "Landlord" on the agreements provided for review, including "EB PREFERRED," "EB Preferred Inc" and "EB Preferred Property Management." EB's use of the fictitious business names "EB Preferred Inc" and "EB Preferred Property Management" during the audit period without first obtaining a license from the Department bearing such names is in violation of Code Section 10159.5 and Regulation 2731.

30.

BARRON Interview with SI Amezola

A. According to BARRON, she has been a property manager since 2008 and that her RES license status changed to restricted under her employ with her previous broker. BARRON indicated that it was her third year with D.O. SCHIAVONE and that she manages 104 doors. BARRON reported that she is usually in the office on a daily basis and usually runs the business by herself, and that due to recent health issues, she has hired an assistant (Rose). When asked about her duties, BARRON stated she is the property manager, completes reports, disperses money, deals with tenants and owners, shows properties and signs contracts. As to advertising, BARRON indicated she uses Craigslist.org and fliers to advertise available properties. When asked about D.O. SCHIAVONE's visibility, BARRON reported that he makes office visits at least once per month and is in the office for a few hours to review paperwork and

1 bank statements. BARRON added that SCHIAVONE is available via telephone and e-mail and
2 is accessible for helping her and answering her questions.

3 B. BARRON pays herself once per month from the total rental income, and then
4 pays SCHIAVONE his portion from her personal bank account.

5 C. BARRON was licensed and associated with EB, the D.O. of which was
6 SCHIAVONE. However, throughout the duration of BARRON's employ under EB as her
7 employing REB, BARRON engaged in the business of, or acted in the capacity of a RES to
8 perform licensed acts for EB, and accepted compensation for said licensed activities directly
9 from the property owners, rather than through her employing REB of record, SCHIAVONE.
10 BARRON's receipt of such compensation is in violation of Code Section 10137.

11 31.

12 SCHIAVONE Interview with SI Amezola

13 A. According to SCHIAVONE, he is from Corona, California and has another
14 corporation, HLS Group Inc, a real estate sales corporation. SCHIAVONE indicated that he has
15 known BARRON personally for quite some time and that she reached out to him when her RES
16 license status became restricted and she needed a REB of record in order to continue with her
17 business. SCHIAVONE stated that he asked BARRON what that entailed, and BARRON told
18 him that supervision of her business included reviewing files and touching bases with her to
19 provide guidance; SCHIAVONE stated that he believed he could provide such help to BARRON
20 and her business. SCHIAVONE reported that he joined EB in May 2015, that EB is BARRON's
21 company, and that by the time they made their agreement the business was already in place.
22 SCHIAVONE indicated that he spends an average of eight (8) hours per month in the office, but
23 that he is available to BARRON via telephone and e-mail, and that he communicates with
24 BARRON on a weekly basis. SCHIAVONE stated that he resides in Corona, California, which
25 is 140 miles from the EB office in Taft, California. SCHIAVONE stated that he does not have a
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1 policies and procedures manual in place. SCHIAVONE also stated that he and BARRON are
2 signers on the trust account (Trust Account #1).

3 B. D.O. SCHIAVONE failed to exercise reasonable control and supervision over
4 the activities conducted by licensees and/or employees on behalf of EB as necessary to secure
5 full compliance with the Real Estate Laws and Regulations, in violation of **Code Sections 10159.2**
6 **and 10177(h) and Regulation 2725.**

7 32.

8 **Additional Violations of the Real Estate Law**

9 The overall conduct of Respondents EB PREFERRED, RALPH DOMENICO
10 SCHIAVONE, and ETHELE MARIE BARRON is violative of the Real Estate Law and
11 constitutes cause for the suspension or revocation of their real estate licenses and license rights
12 under the provisions of **Code Section 10177(g)** for negligence and **Code Section 10177(d)** for
13 willful disregard of the Real Estate Law.

14 **COSTS**

15 **Investigation and Enforcement Costs**

16 33.

17 **Code Section 10106** provides, in pertinent part, that in any order issued in
18 resolution of a disciplinary proceeding before the Department of Real Estate, the Commissioner
19 may request the administrative law judge to direct a licensee found to have committed a violation
20 of this part to pay a sum not to exceed the reasonable costs of the investigation and enforcement
21 of the case.

22 **Audit Costs**

23 34.

24 **Code Section 10148(b)** provides, in pertinent part, the Commissioner shall charge
25 a real estate broker for the cost of any audit, if the Commissioner has found in a final decision
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1 following a disciplinary hearing that the broker has violated Code section 10145 or a regulation
2 or rule of the Commissioner interpreting said section.

3 WHEREFORE, Complainant prays that a hearing be conducted on the allegations
4 of this Accusation and that upon proof thereof, a decision be rendered imposing disciplinary
5 action against the licenses and license rights of Respondents EB PREFERRED, RALPH
6 DOMENICO SCHIAVONE, and ETHELE MARIE BARRON under the Real Estate Law (Part 1
7 of vision 4 of the Business and Professions Code), for the cost of investigation and enforcement
8 as permitted by law, and for such other and further relief as may be proper under other provisions
9 of law, and for costs of audit.

10 Dated at Los Angeles, California

11 this 16 day of May, 2019.

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13 Brenda Smith
14 Supervising Special Investigator

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20 cc: EB PREFERRED
21 RALPH DOMENICO SCHIAVONE
22 ETHELE MARIE BARRON
23 Enforcement – A. Amezola, B. Smith
24 Audits – A. Patterson, C. de Sonnaville
25 Sacto.
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