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Department of Real Estate
P.O. Box 187007
Sacramento, CA 95818-7007

Telephone: (916) 227-0781

FILED
OCT 26 2006

DEPARTMENT OF REAL ESTATE

By Anne Shaver

BEFORE THE DEPARTMENT OF REAL ESTATE
STATE OF CALIFORNIA

* * *

In the Matter of the Accusation of)	No. H-3471 SD
)	
CAL-PROP MANAGEMENT INC. and)	<u>STIPULATION AND</u>
RICHARD NEIL THORNTON,)	<u>AGREEMENT</u>
)	
Respondent.)	

It is hereby stipulated by and between CAL-PROP MANAGEMENT INC. and RICHARD NEIL THORNTON (hereinafter "Respondents") and their attorney, Adam G. Slote, and the Complainant, acting by and through Truly Sughrue, Counsel for the Department of Real Estate, as follows for the purpose of settling and disposing the Accusation filed on March 27, 2006 in this matter:

1. All issues which were to be contested and all evidence which was to be presented by Complainant and Respondents at a formal hearing on the Accusation, which hearing was to be held in accordance with the provisions of the Administrative Procedure Act (APA), shall instead and in place thereof be

1 submitted solely on the basis of the provisions of this
2 Stipulation and Agreement.

3 2. Respondents have received, read and understand the
4 Statement to Respondent, and the Discovery Provisions of the APA
5 filed by the Department of Real Estate in this proceeding.

6 3. Respondents filed a Notice of Defense pursuant to
7 Section 11505 of the Government Code for the purpose of
8 requesting a hearing on the allegations in the Accusation.
9 Respondents hereby freely and voluntarily withdraw said Notice of
10 Defense. Respondents acknowledge that they understand that by
11 withdrawing said Notice of Defense they will thereby waive their
12 rights to require the Commissioner to prove the allegations in
13 the Accusation at a contested hearing held in accordance with the
14 provisions of the APA, and that they will waive other rights
15 afforded to them in connection with the hearing such as the right
16 to present evidence in defense of the allegations in the
17 Accusation and the right to cross-examine witnesses.

18 4. This stipulation is based on the factual
19 allegations contained in the Accusation. In the interest of
20 expediency and economy, Respondents choose not to contest these
21 factual allegations, but to remain silent and understands that,
22 as a result thereof, these factual statements will serve as a
23 prima facie basis for the "Determination of Issues" and "Order"
24 set forth below. The Real Estate Commissioner shall not be
25 required to provide further evidence to prove such allegations.

26 5. This Stipulation and Respondents decision not to
27

1 contest the Accusation are made for the purpose of reaching an
2 agreed disposition of this proceeding and are expressly limited
3 to this proceeding and any other proceeding or case in which the
4 Department of Real Estate (hereinafter "the Department"), the
5 state or federal government, an agency of this state, or an
6 agency of another state is involved.

7 6. Respondents understand that by agreeing to this
8 Stipulation and Agreement, Respondents agree to pay, pursuant to
9 Section 10148 of the California Business and Professions Code,
10 the cost of the audit which resulted in the determination that
11 Respondent committed the trust fund violation(s) found in
12 Paragraph I, below, of the Determination of Issues. The amount
13 of said costs is \$9,442.55.

14 7. Respondents further understands that by agreeing
15 to this Stipulation and Agreement in Settlement, the findings
16 set forth below in the Determination Of Issues become final, and
17 that the Commissioner may charge said Respondents for the
18 costs of any audit conducted pursuant to Section 10148 of
19 the California Business and Professions Code to determine if
20 the violations have been corrected. The maximum costs of
21 said audit shall not exceed \$9,442.55.

22 8. It is understood by the parties that the Real
23 Estate Commissioner may adopt the Stipulation and Agreement as
24 his decision in this matter thereby imposing the penalty and
25 sanctions on the real estate licenses and license rights of
26 Respondent as set forth in the below "Order". In the event that
27

1 the Commissioner in his discretion does not adopt the Stipulation
2 and Agreement, it shall be void and of no effect, and Respondents
3 shall retain the right to a hearing and proceeding on the
4 Accusation under all the provisions of the APA and shall not be
5 bound by any admission or waiver made herein.

6 9. The Order or any subsequent Order of the Real
7 Estate Commissioner made pursuant to this Stipulation and
8 Agreement shall not constitute an estoppel, merger or bar to any
9 further administrative or civil proceedings by the Department of
10 Real Estate with respect to any matters which were not
11 specifically alleged to be causes for accusation in this
12 proceeding.

13 * * *

14 DETERMINATION OF ISSUES

15 By reason of the foregoing stipulations and waivers and
16 solely for the purpose of settlement of the pending Accusation
17 without a hearing, it is stipulated and agreed that the following
18 determination of issues shall be made:
19

20 I

21 The acts and omissions of Respondents CAL-PROP
22 MANAGEMENT INC. and RICHARD NEIL THORNTON as described in the
23 Accusation are grounds for the suspension or revocation of
24 Respondents licenses and license rights under the following
25 sections of the Code and Regulations:

26 (1) As to Paragraphs IX(a), under Section 10177(d) of
27 the Code in conjunction with Section 10145 of the Code;

1 (2) As to Paragraph IX(b), under Section 10177(d) of
2 the Code in conjunction with Section 2832.1 of the Regulations;

3 (3) As to Paragraph IX(c), under Section 10177(d) of
4 the Code in conjunction with Section 2831 of the Regulations;

5 (4) As to Paragraph IX(d), under Section 10177(d) of
6 the Code in conjunction with Section 2831.1 of the Regulations;

7 (5) As to Paragraph IX(e), under Section 10177(d) of
8 the Code in conjunction with Section 2831.2 of the Regulations;

9 (6) As to Paragraph IX(f), under Section 10177(d) of
10 the Code in conjunction with Section 2835 of the Regulations and
11 Section 10176(e) of the Code;

12 (7) As to Paragraph X, under Section 10177(d) of the
13 Code in conjunction with Section 2834 of the Regulations;

14 (8) As to Paragraph XI, under Section 10177(d) of the
15 Code in conjunction with Section 10145(d) of the Code; and

16 (9) As to Paragraph XI, under Section 10177(d) of the
17 Code in conjunction with Section 2731 of the Regulations.

18 II

19 The acts and/or omissions of Respondent RICHARD NEIL
20 THORNTON (hereinafter "THORNTON") described in the Accusation,
21 constitute failure on the part of THORNTON, as designated
22 broker-officer for CAL-PROP MANAGEMENT INC., to exercise
23 reasonable supervision and control over the licensed activities
24 of CAL-PROP MANAGEMENT INC. required by Section 10159.2 of the
25 Code, and is cause for the suspension or revocation of
26 THORNTON's license and/or license rights under Section 10177(h)
27 of the Code.

* * *

ORDER

I

1
2
3
4 All licenses and licensing rights of Respondent CAL-PROP
5 MANAGEMENT INC. (hereinafter "CAL-PROP") under the Real Estate
6 Law are suspended for a period of thirty (30) days from the
7 effective date of this Order; provided, however, that

8 1) Thirty (30) days of said suspension shall be stayed, upon the
9 condition that CAL-PROP petition pursuant to Section 10175.2
10 of the Business and Professions Code and pays a monetary
11 penalty pursuant to Section 10175.2 of the Business and
12 Professions Code at a rate of \$200 for each day of the
13 suspension for a total monetary penalty of \$6,000.

14 a) Said payment shall be in the form of a cashier's check or
15 certified check made payable to the Recovery Account of the
16 Real Estate Fund. Said check must be delivered to the
17 Department prior to the effective date of the Order in this
18 matter.

19 b) No further cause for disciplinary action against the Real
20 Estate licenses of CAL-PROP occurs within two (2) years from
21 the effective date of the decision in this matter.

22 c) If CAL-PROP fails to pay the monetary penalty as provided
23 above prior to the effective date of this Order, the stay of
24 the suspension shall be vacated as to that Respondent and
25 the order of suspension shall be immediately executed, under
26 this Order, in which event the said Respondent shall not be
27

1 entitled to any repayment nor credit, prorated or otherwise,
2 for the money paid to the Department under the terms of this
3 Order.

4 d) If said Respondent pays the monetary penalty and any other
5 moneys due under this Stipulation and Agreement and if no
6 further cause for disciplinary action against the real
7 estate license of said Respondent occurs within two (2)
8 years from the effective date of this Order, the entire stay
9 hereby granted this Order, as to said Respondent only, shall
10 become permanent.

11 2) Pursuant to Section 10148 of the Business and Professions
12 Code, CAL-PROP shall jointly and severally with THORNTON pay
13 the sum of \$9,442.55 for the Commissioner's cost of the audit
14 which led to this disciplinary action. Respondents shall pay
15 such cost within forty-five (45) days of receiving an invoice
16 therefor from the Commissioner. The Commissioner may suspend
17 the CAL-PROP's license pending a hearing held in accordance
18 with Section 11500, et seq., of the Government Code, if
19 payment is not timely made as provided for herein, or as
20 provided for in a subsequent agreement between the Respondent
21 and the Commissioner. The suspension shall remain in effect
22 until payment is made in full or until Respondent enters into
23 an agreement satisfactory to the Commissioner to provide for
24 payment, or until a decision providing otherwise is adopted
25 following a hearing held pursuant to this condition.

26 3) Pursuant to Section 10148 of the Business and Professions
27 Code, CAL-PROP shall jointly and severally with THORNTON pay

1 the Commissioner's reasonable cost, not to exceed \$9,442.55,
2 for an audit to determine if Respondents have corrected the
3 trust fund violation(s) found in Paragraph I of the
4 Determination of Issues. In calculating the amount of the
5 Commissioner's reasonable cost, the Commissioner may use the
6 estimated average hourly salary for all persons performing
7 audits of real estate brokers, and shall include an allocation
8 for travel time to and from the auditor's place of work.
9 Respondent shall pay such cost within forty-five (45) days of
10 receiving an invoice therefor from the Commissioner detailing
11 the activities performed during the audit and the amount of
12 time spent performing those activities. The Commissioner may
13 suspend CAL-PROP'S license pending a hearing held in
14 accordance with Section 11500, et seq., of the Government
15 Code, if payment is not timely made as provided for herein, or
16 as provided for in a subsequent agreement between Respondent
17 and the Commissioner. The suspension shall remain in effect
18 until payment is made in full or until Respondent enters into
19 an agreement satisfactory to the Commissioner to provide for
20 payment, or until a decision providing otherwise is adopted
21 following a hearing held pursuant to this condition.

II

22
23 All licenses and licensing rights of Respondent THORNTON
24 under the Real Estate Law are suspended for a period of THIRTY
25 (30) days from the effective date of this Order; provided,
26 however, that:
27

- 1) Thirty (30) days of said suspension shall be stayed, upon the condition that THORNTON petition pursuant to Section 10175.2 of the Business and Professions Code and pays a monetary penalty pursuant to Section 10175.2 of the Business and Professions Code at a rate of \$200 for each day of the suspension for a total monetary penalty of \$6,000.
- a) Said payment shall be in the form of a cashier's check or certified check made payable to the Recovery Account of the Real Estate Fund. Said check must be delivered to the Department prior to the effective date of the Order in this matter.
- b) No further cause for disciplinary action against the Real Estate licenses of said Respondent occurs within two (2) years from the effective date of the decision in this matter.
- c) If THORNTON fails to pay the monetary penalty as provided above prior to the effective date of this Order, the stay of the suspension shall be vacated as to that Respondent and the order of suspension shall be immediately executed, under this Order, in which event the said Respondent shall not be entitled to any repayment nor credit, prorated or otherwise, for the money paid to the Department under the terms of this Order.
- d) If THORNTON pays the monetary penalty and any other moneys due under this Stipulation and Agreement and if no further cause for disciplinary action against the real estate

1 license of said Respondent occurs within two (2) years from
2 the effective date of this Order, the entire stay hereby
3 granted under this Order, as to said Respondent only, shall
4 become permanent.

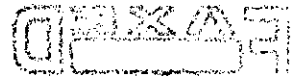
5 2) THORNTON shall, within six (6) months from the effective date
6 of this Decision, take and pass the Professional
7 Responsibility Examination administered by the Department
8 including the payment of the appropriate examination fee. If
9 THORNTON fails to satisfy this condition, the Commissioner may
10 order suspension of the license until Respondent passes the
11 examination.

12 3) THORNTON shall, prior to the effective date of this Decision,
13 submit proof satisfactory to the Commissioner of having taken
14 and successfully completed the continuing education course on
15 trust fund accounting and handling specified in subdivision
16 (a) of Section 10170.5 of the Business and Professions Code.
17 Proof of satisfaction of this requirement includes evidence
18 that THORNTON has successfully completed the trust fund
19 account and handling continuing education course within 120
20 days prior to the effective date of the Decision in this
21 matter. If THORNTON fails to satisfy this condition, the
22 Commissioner may order the suspension of THORNTON'S license
23 until THORNTON presents proof that she has successfully
24 completed the trust fund course.

25 4) Pursuant to Section 10148 of the Business and Professions
26 Code, THORNTON shall jointly and severally with CAL-PROP pay
27 the sum of \$9,442.55 for the Commissioner's cost of the audit

1 which led to this disciplinary action. Respondent shall pay
2 such cost within forty-five (45) days of receiving an invoice
3 therefor from the Commissioner. The Commissioner may suspend
4 THORNTON'S license pending a hearing held in accordance with
5 Section 11500, et seq., of the Government Code, if payment is
6 not timely made as provided for herein, or as provided for in
7 a subsequent agreement between the Respondent and the
8 Commissioner. The suspension shall remain in effect until
9 payment is made in full or until Respondent enters into an
10 agreement satisfactory to the Commissioner to provide for
11 payment, or until a decision providing otherwise is adopted
12 following a hearing held pursuant to this condition.

13 5) Pursuant to Section 10148 of the Business and Professions
14 Code, THORNTON shall jointly and severally with CAL-PROP pay
15 the Commissioner's reasonable cost, not to exceed \$9,442.55,
16 for an audit to determine if Respondents have corrected the
17 trust fund violation(s) found in Paragraph I of the
18 Determination of Issues. In calculating the amount of the
19 Commissioner's reasonable cost, the Commissioner may use the
20 estimated average hourly salary for all persons performing
21 audits of real estate brokers, and shall include an allocation
22 for travel time to and from the auditor's place of work.
23 Respondent shall pay such cost within forty-five (45) days of
24 receiving an invoice therefor from the Commissioner detailing
25 the activities performed during the audit and the amount of
26 time spent performing those activities. The Commissioner may
27 suspend THORNTON'S license pending a hearing held in



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accordance with Section 11500, et seq., of the Government Code, if payment is not timely made as provided for herein, or as provided for in a subsequent agreement between Respondent and the Commissioner. The suspension shall remain in effect until payment is made in full or until Respondent enters into an agreement satisfactory to the Commissioner to provide for payment, or until a decision providing otherwise is adopted following a hearing held pursuant to this condition.

14-Sept-06

DATED

TRULY SUGHRUE
Counsel for Complainant

* * *

I have read the Stipulation and Agreement, discussed it with my counsel, and its terms are understood by me and are agreeable and acceptable to me. I understand that I am waiving rights given to me by the California Administrative Procedure Act, and I willingly, intelligently and voluntarily waive those rights, including the right of requiring the Commissioner to prove the allegations in the Accusation at a hearing at which I would have the right to cross-examine witnesses against me and to present evidence in defense and mitigation of the charges.

9-8-06

DATED

CAL-PROP MANAGEMENT INC.
Respondent

9-8-06

DATED

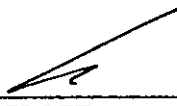
RICHARD NEIL THORNTON
Respondent

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I have reviewed the Stipulation and Agreement as to form and content and have advised my client accordingly.

9-8-06

DATED

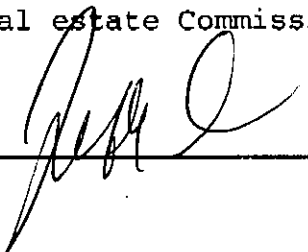


ADAM G. SROTE
Attorney for Respondents

* * *

The foregoing Stipulation and Agreement is hereby adopted as my Decision and shall become effective at 12 o'clock noon on NOV 15 2006

IT IS SO ORDERED 10 23, 2006.

JEFF DAVI
Real estate Commissioner


1 TRULY SUGHRUE, Counsel
2 State Bar No. 223266
3 Department of Real Estate
4 P.O. Box 187007
5 Sacramento, CA 95818-7007
6
7 Telephone: (916) 227-0781

FILED
MAR 27 2006

DEPARTMENT OF REAL ESTATE

By 

8 BEFORE THE DEPARTMENT OF REAL ESTATE

9 STATE OF CALIFORNIA

10 * * *

11 In the Matter of the Accusation of) No. H-3471 SD
12 CAL-PROP MANAGEMENT INC. and) ACCUSATION
13 RICHARD NEIL THORNTON,)
14 Respondent.)

15
16 The Complainant, J. CHRIS GRAVES, a Deputy Real Estate
17 Commissioner of the State of California, for cause of Accusation
18 against CAL-PROP MANAGEMENT INC. and RICHARD NEIL THORNTON
19 (hereinafter "Respondents"), are informed and alleges as follows:

20 I

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

24 II

25 Respondents are presently licensed and/or have license
26 rights under the Real Estate Law (Part 1 of Division 4 of the
27 Business and Professions Code) (hereinafter "the Code").

III

1 At all times herein mentioned, CAL-PROP MANAGEMENT INC.
2 (hereinafter "CAL-PROP") was and is licensed by the Department of
3 Real Estate (hereafter the "Department") as a real estate broker
4 corporation.
5

6 IV

7 At all times herein mentioned, RICHARD NEIL THORNTON
8 (hereinafter "THORNTON") was and is licensed by the Department of
9 Real Estate as the designated officer for CAL-PROP.

10 V

11 As said designated officer-broker, THORNTON was
12 responsible pursuant to Section 10159.2 of the Code for the
13 supervision of the activities of the officers, agents, real
14 estate licensees, and employees of CAL-PROP for which a license
15 is required.

16 VI

17 At all times herein mentioned, Respondents engaged in
18 activities on behalf of others for which a real estate license is
19 required under Section 10131(b) of the Code, for or in
20 expectation of compensation, and leased or rented, offered to
21 lease or rent, solicited prospective tenants, collected rents on,
22 and/or managed certain real properties in California.

23 VII

24 In acting as real estate brokers, as described in
25 Paragraph VI, Respondents accepted or received funds in trust
26 (hereinafter "trust funds") from or on behalf of owners and
27

1 tenants in connection with the leasing, renting, and collection
2 of rents on real property or improvements thereon, as alleged
3 herein, and thereafter from time to time made disbursements of
4 said trust funds.

5 VIII

6 The aforesaid trust funds accepted or received by
7 Respondents were deposited or caused to be deposited by
8 Respondents into on or more bank accounts (hereinafter "trust
9 funds accounts") maintained by Respondents for the handling of
10 trust funds, including but not limited to the following:

<u>TITLE AND ACCOUNT NUMBERS</u>	<u>BANK</u>
11 Lucas Neil, Inc. DBA Cal-Prop Management 12 Trust Account 13 Account No. 1302124 (hereinafter "Trust #1")	San Diego Trust Bank 2550 5 th Avenue San Diego, CA 92103
14 Lucas Neil Inc. DBA Cal Property 15 Management A 1-Trust Account 16 Account No. 153490964621 (hereinafter "Trust #2")	U.S. Bank 1601 Grand Avenue San Diego, CA 92109
17 Lucas Neil Inc. DBA Cal Prop Mgmt Trust 18 A/C Account No. RH200872 (hereinafter "Trust #3")	AIG Annuity Insurance Company 205 east 10 th Avenue Amarillo, TX 79101- 3546
19 Lucas Neil Inc. DBA Cal-Prop Management 20 Lease Only Trust Account Account No. 1301928 (hereinafter "Trust #4")	San Diego Trust Bank 2550 5 th Avenue San Diego, CA 92103
21 Lucas Neil Inc. DBA Cal Property 22 Management Lease Only Trust Account 23 Account No. 153492115255 (hereinafter "Trust #5")	U.S. Bank 1601 Grand Avenue San Diego, CA 92109
24 \\\	
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27

IX

1
2 Between on or about October 1, 2003 through August 31,
3 2005, in connection with the collection and disbursement of said
4 trust funds Respondents:

5 (a) Failed to deposit and maintain trust funds in
6 Trust #1 and Trust #2 in such manner that as of August 31, 2005,
7 there was a combined shortage of \$356,096.44 of trust funds.

8 (b) Failed to obtain prior written consent from each
9 of the principals for the reduction of the aggregate balance of
10 trust funds in Trust #1 and Trust #2 to an amount less than the
11 existing aggregate trust fund liability to the owners of said
12 funds in violation of Section 2832.1 of the Regulations.

13 (c) Failed to maintain a written control record of all
14 trust funds received and disbursed for Trust #1, 2, 3, 4, and 5
15 containing all information required by Section 2831.

16 (d) Failed to maintain accurate separate records and
17 accurate beneficiary or transaction statements for all trust
18 funds deposited into and/or disbursed from Trust #3 as required
19 by Section 2831.1

20 (e) Failed to reconcile the balance of separate
21 beneficiary or transaction records with the control records of
22 trust funds received and disbursed, from Trust #1, 2, 3,4 and 5,
23 at least once a month, and/or failed to maintain a record of
24 such reconciliations as required by Section 2831.2 of the
25 Regulations.

26 (f) Commingled with CAL-PROP's own money or property,
27 the money or property of others which was received or held by

1 Respondent in trust in violation of Section 10176(e) of the
2 Code.

3 X

4 In connection with the receipt and disbursement of
5 trust funds described in Paragraph VIII above, CAL-PROP
6 permitted withdrawals to be made from Trust #1, 2, 3, 4, and 5
7 by someone other than a corporate officer, or a salesperson
8 licensed to CAL-PROP and authorized in writing by CAL-PROP to
9 withdraw said funds, or an authorized unlicensed employee
10 covered by a fidelity bond indemnifying CAL-PROP against loss in
11 an amount sufficient to cover the maximum amount of funds to
12 which the employee had access at any time, as required by
13 Section 2834 of the Regulations.

14 XI

15 CAL-PROP deposited trust funds of multiple
16 beneficiaries into Trust #3 an interest bearing annuity account.
17 CAL-PROP failed to comply with the requirements of Section
18 10145(d) of the Code.

19 XII

20 CAL-PROP operated their real estate business in San
21 Diego, California, under the fictitious business names of "Cal-
22 Prop Investments and Management", without CAL-PROP obtaining a
23 license bearing said fictitious business name as required by
24 Section 2731 of the Regulations.

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27

XIII

1 THORNTON failed to exercise reasonable supervision over
2 the acts of CAL-PROP in such a manner as to allow the acts and
3 events described above to occur.
4

XIV

5 The acts and/or omissions of THORNTON described in
6 paragraph XIII, constitutes failure on the part of THORNTON, as
7 designated broker-officer for CAL-PROP, to exercise reasonable
8 supervision and control over the licensed activities of CAL-PROP
9 required by Section 10159.2 of the Code.
10

XV

11 The facts alleged above are grounds for the suspension
12 or revocation of Respondents licenses and license rights under
13 the following sections of the Code and Regulations:
14

15 (1) As to Paragraphs IX(a), under Section 10177(d) of
16 the Code in conjunction with Section 10145 of the Code;

17 (2) As to Paragraph IX(b), under Section 10177(d) of
18 the Code in conjunction with Section 2832.1 of the Regulations;

19 (3) As to Paragraph IX(c), under Section 10177(d) of
20 the Code in conjunction with Section 2831 of the Regulations;

21 (4) As to Paragraph IX(d), under Section 10177(d) of
22 the Code in conjunction with Section 2831.1 of the Regulations;

23 (5) As to Paragraph IX(e), under Section 10177(d) of
24 the Code in conjunction with Section 2831.2 of the Regulations;

25 (6) As to Paragraph IX(f), under Section 10177(d) of
26 the Code in conjunction with Section 2835 of the Regulations and
27 Section 10176(e) of the Code;

1 (7) As to Paragraph X, under Section 10177(d) of the
2 Code in conjunction with Section 2834 of the Regulations;

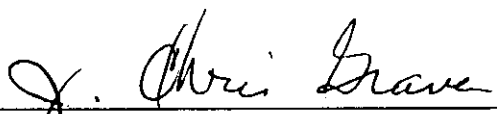
3 (8) As to Paragraph XI, under Section 10177(d) of the
4 Code in conjunction with Section 10145(d) of the Code; and

5 (9) As to Paragraph XI, under Section 10177(d) of the
6 Code in conjunction with Section 2731 of the Regulations.

7 XVI

8 The facts alleged in Paragraphs XIII and XIV, are
9 grounds from the suspension or revocation of the licenses and
10 license rights of Respondent THORNTON under Sections 10177(g)
11 and/or 10177(h) of the Code, and Section 10177(d) of the Code in
12 conjunction with Section 10159.2 of the Code.

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

20
21 
22 J. CHRIS GRAVES
23 Deputy Real Estate Commissioner

24 Dated at San Diego, California,
25 this 14th day of March, 2006
26
27