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FILED
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DEPARTMENT OF REAL ESTATE
By B. Nicholas

BEFORE THE DEPARTMENT OF REAL ESTATE

STATE OF CALIFORNIA

* * *

In the Matter of the Accusation of:	
CHAMBERS PROPERTY MANAGEMENT; JIN JEFFREY KIM; and KENDRA CHAMBERS,	No. H-3624 FR
Respondents.	ACCUSATION

The Complainant, RUBEN CORONADO, acting in his official capacity as a Supervising Special Investigator of the State of California, for this Accusation against CHAMBERS PROPERTY MANAGEMENT ("CPM"), KENDRA CHAMBERS ("CHAMBERS") and JIN JEFFREY KIM ("KIM"), sometimes collectively referred to as Respondents, is informed and alleges as follows:

1

CPM is presently licensed and/or has license rights under the Real Estate Law, Part 1 of Division 4 of the Business and Professions Code ("Code"), by the Department of Real Estate ("Department") as a corporate real estate broker, Lic. No. 02234130.

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KIM is presently licensed and/or has license rights under the Code as a real estate broker, Lic. No. 01456017.

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CHAMBERS is presently licensed and/or has license rights under the Code as a real estate salesperson, Lic. No. 02180272.

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At all times mentioned, KIM was the designated broker-officer of CPM. As the designated broker-officer, KIM was responsible, pursuant to Section 10159.2 of the Code, for the supervision of the activities of officers, agents, real estate licensees and employees of CPM for which a real estate license is required to ensure the compliance of the corporation with the Real Estate Law and the Regulations.

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Whenever acts referred to below are attributed to Respondents, those acts are alleged to have been done by Respondents, acting by themselves, or by and/or through one or more known or unknown agents, associates, and/or co-conspirators.

6

At all times mentioned, Respondents engaged in the business of, acted in the capacity of, advertised, or assumed to act as a real estate broker within the State of California within the meaning of Section 10131(b) of the Code, including the operation and conduct of a property management business with the public wherein, on behalf of others, for compensation or in expectation of compensation, Respondents leased or rented or offered to lease or rent, or placed for rent, or solicited listings of places for rent, or solicited for prospective tenants, or negotiated the sale, purchase or exchange of leases on real property, or on a business opportunity, or collected rents from real property, or improvements thereon, or from business opportunities.

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On or about May 16, 2025, the Department completed its audit (FR23-0060) of the books and records of CPM's property management activities described above in Paragraph 6.

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The auditor examined property management records for the period of June 1, 2023, through May 31, 2024 ("the audit period").

FIRST CAUSE OF ACTION

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Complainant refers to Paragraphs 1 through 7, above, and incorporates the same, herein.

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While acting as a real estate broker as described in Paragraph 6, above, and within the audit period, Respondents accepted or received funds in trust ("trust funds") from or on behalf of property owners, lessees and others in connection with property management activities, and deposited or caused to be deposited those funds into bank accounts maintained by Respondents at JP Morgan Chase Bank, N.A., 3751 West Shaw Avenue, Fresno, CA 93711, as described below:

BANK ACCOUNT #1 ("B/A1")	
Account No.:	XXXXX3650
Entitled:	KO Realty Investment Group, LLC
BANK ACCOUNT #1 ("B/A2")	
Account No.:	XXXXX5155
Entitled:	CHAMBERS PROPERTY MANAGEMENT

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In the course of the activities described in Paragraph 6, in connection with the collection and disbursement of trust funds, it was determined that:

(a) An accountability was performed on account B/A1, and as of March 31, 2024, a shortage of $20,333.00 was revealed out of a total accountability of $91,243.67 in violation of Section 10145 (handling of trust funds) of the Code;

(b) Respondents failed to obtain written permission from the owners of the trust funds in account B/A1 to allow the balances to drop below accountability, in violation of Section 2832.1 (trust fund handling for multiple beneficiaries) of Title 10, Chapter 6, California Code of Regulations ("Regulations");

(c) An accurate Control Record and Separate Records for Each Beneficiary or Transaction ("Separate Records") for B/A1 and B/A2 were not maintained during the audit period in violation of Section 10145 of the Code and Sections 2831 (trust fund records to be maintained) and 2831.1 (separate record for each beneficiary or transaction) of the Regulations;

(d) During the audit period, monthly reconciliations, comparing the balance of all separate records to the balance of the control record for B/A1 and B/A2 were not performed and maintained as required by Section 10145 of the Code and Section 2831.2 (trust account reconciliation) of the Regulations;

(e) B/A1 and B/A2 were not properly designated as trust accounts as required by Section 10145 of the Code and Section 2832 (trust fund handling) of the Regulations; and

(f) B/A1 had an authorized signer that was unlicensed without any fidelity bond or insurance coverage in violation of Section 10145 of the Code and Section 2834 (trust account withdrawals) of the Regulations.

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The act and/or omissions described above constitute violations of Sections 2831.1, 2831.2, 2832, 2832.1, and 2834 of the Regulations and Section 10145 of the Code and are grounds for discipline under the aforementioned Section and/or Sections 10177(d) (willful disregard of real estate laws) and 10177(g) (negligence/incompetence by licensee) of the Code.

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SECOND CAUSE OF ACTION

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Complainant refers to Paragraphs 1 through 11, above, and incorporates the same, herein.

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The audit revealed that from June 1, 2023 to May 31, 2024, KIM and CHAMBERS conducted licensed property management activities first through an unlicensed LLC and then under CPM prior to CPM being licensed by the Department in violation of Section 10130 of the Code.

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The acts and/or omissions as described above constitute grounds for the suspension or revocation of the license and license rights of Respondents pursuant to Sections 10137 (unlawful compensation), 10177(d) and/or 10177(g) of the Code.

THIRD CAUSE OF ACTION

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Complainant refers to Paragraphs 1 through 14, above, and incorporates the same, herein.

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At times mentioned above, KIM was responsible, as the supervising designated broker/officer for CPM, for the supervision and control of the activities conducted on behalf of CPM's business by its employees to ensure its compliance with the Real Estate Law and Regulations. KIM failed to exercise reasonable supervision and control over the property management activities of CPM. In particular, KIM permitted, ratified and/or caused the conduct described above to occur, and failed to take reasonable steps, including but not limited to, the handling of trust funds, supervision of employees, and the implementation of policies, rules, and systems to ensure the compliance of the business with the Real Estate Law and the Regulations.

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The above acts and/or omissions of KIM violate Section 2725 (broker supervision) of the Regulations and Section 10159.2 (responsibility/designated officer) of the Code and constitute grounds for disciplinary action under the provisions of Sections 10177(d), 10177(g) and 10177(h) (broker supervision) of the Code.

COSTS OF INVESTIGATION AND ENFORCEMENT

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Section 10106 of the Code provides, in pertinent part, that in any order issued in resolution of a disciplinary proceeding before the Department, the Commissioner may request the Administrative Law Judge to direct a licensee found to have committed a violation of this part to pay a sum not to exceed the reasonable costs of the investigation and enforcement of the case.

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The acts and/or omissions of Respondents as alleged above, entitle the Department to reimbursement of the costs of its audit pursuant to Section 10148(b) of the Code.

WHEREFORE, Complainant prays that a hearing be conducted on the allegations of this Accusation and that upon proof thereof, a decision be rendered imposing disciplinary action against all licenses and license rights of Respondent under the Real Estate Law, for the

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cost of investigation and enforcement as permitted by law, and for such other and further relief as may be proper under other provisions of law.

RUBEN CORONADO
Supervising Special Investigator

Dated at Fresno, California,
this 21st day of October, 2025.

DISCOVERY DEMAND

Pursuant to Sections 11507.6, *et seq*. of the *Administrative Procedure Act*, the Department hereby makes demand for discovery pursuant to the guidelines set forth in the *Administrative Procedure Act*. Failure to provide Discovery to the Department may result in the exclusion of witnesses and documents at the hearing or other sanctions that the Office of Administrative Hearings deems appropriate.