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FILED

JUL 31 2026

DEPARTMENT OF REAL ESTATE
By B. Nicholas

8 BEFORE THE DEPARTMENT OF REAL ESTATE

9 STATE OF CALIFORNIA

10 * * *

11 In the Matter of the Accusation of:)
12) No. H-3670 FR
13 COMMERCIAL ASSET MANAGEMENT)
14 and OTHON AYON,) ACCUSATION
Respondents.)
_____)

15 The Complainant, RUBEN CORONADO, acting in his official capacity as a
16 Supervising Special Investigator of the State of California, for this Accusation against
17 COMMERCIAL ASSET MANAGMENT ("CAM") and OTHON AYON ("AYON"),
18 sometimes collectively referred to as Respondents, is informed and alleges as follows:

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20 CAM is presently licensed and/or has license rights under the Real Estate Law,
21 Part 1 of Division 4 of the Business and Professions Code ("Code"), by the Department of Real
22 Estate ("Department") as a corporate real estate broker, License No. 02153968. On December
23 13, 2025, CAM's license expired. Pursuant to Sections 10103 and 10201 of the Code, the
24 Department retains jurisdiction.

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26 AYON is presently licensed and/or has license rights under the Code as a real
27 estate broker, License No. 01279229.

1 3

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

7 4

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

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

21 6

22 On or about March 25, 2026, the Department completed its audit (FR25-0005) of
23 the books and records of CAM's property management activities described above in Paragraph 4.
24 The auditor examined property management records for the period of August 1, 2024, through
25 July 31, 2025 ("the audit period").

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1 FIRST CAUSE OF ACTION

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3 Complainant refers to Paragraphs 1 through 6, above, and incorporates the same,
4 herein.

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6 While acting as a real estate broker as described in Paragraph 4, above, and within
7 the audit period, Respondents accepted or received funds in trust ("trust funds") from or on
8 behalf of property owners, lessees and others in connection with property management activities,
9 and deposited or caused to be deposited those funds into bank accounts maintained by
10 Respondents at Tri Counties Bank, 5000 California Avenue, Bakersfield, CA 93309, as
11 described below:

BANK ACCOUNT #1 ("B/A1")	
Account No.:	XXXXXX7505
Entitled:	Commercial Asset Management TR ACCT FBO 8215 Prentice Hall
BANK ACCOUNT #2 ("B/A2")	
Account No.:	XXXXXX5892
Entitled:	Commercial Asset Management TR ACCT FBO 1010 K ST

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20 and thereafter from time-to-time made disbursements of said trust funds.

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22 In the course of the activities described in Paragraph 4, in connection with the
23 collection and disbursement of trust funds, it was determined that during the Audit Period:

24 (a) Respondents failed to maintain an accurate and complete record of all trust
25 funds deposited and disbursed ("control record") for B/A1 and B/A2 in violation of Section
26 10145 (trust fund handling) of the Code and Section 2831 (trust fund records to be maintained)
27 of Title 10, Chapter 6, of the California Code of Regulations.

10

The act and/or omissions described above constitute grounds for discipline under the aforementioned Section and/or Sections 10177(d) (willful disregard or violation of real estate laws) and 10177(g) (negligence/incompetence) of the Code.

SECOND CAUSE OF ACTION

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Complainant refers to Paragraphs 1 through 10, above, and incorporates the same, herein.

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Respondents failed to produce records to the Department as required by Section 10148 (retention of records) after several requests by Department personnel and after being served with a Subpoena Duces Tecum on October 2, 2025.

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The act and/or omissions described above constitute grounds for discipline under the aforementioned Section and/or Sections 10148, 10177(d), and 10177(g) of the Code.

THIRD CAUSE OF ACTION

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Complainant refers to Paragraphs 1 through 13, above, and incorporates the same, herein.

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At times mentioned above, AYON was responsible, as the supervising designated broker/officer for CAM, for the supervision and control of the activities conducted on behalf of CAM's business by its employees to ensure its compliance with the Real Estate Law and Regulations. AYON failed to exercise reasonable supervision and control over the property management activities of CAM. In particular, AYON 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

1 policies, rules, and systems to ensure compliance of the business with the Real Estate Law and
2 the Regulations.

3 16

4 The above acts and/or omissions of AYON violate Section 2725 (broker
5 supervision) of the Regulations and Section 10159.2 (responsibility/designated officer) of the
6 Code and constitute grounds for disciplinary action under the provisions of Sections 10177(d),
7 10177(g) and 10177(h) (broker supervision) of the Code.

8 WHEREFORE, Complainant prays that a hearing be conducted on the allegations
9 of this Accusation and that upon proof thereof, a decision be rendered imposing disciplinary
10 action against all licenses and license rights of Respondent under the Real Estate Law, for the
11 cost of investigation and enforcement as permitted by law, and for such other and further relief
12 as may be proper under other provisions of law.

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15 RUBEN CORONADO
16 Supervising Special Investigator

17 Dated at Fresno, California,
18 this 27th day of July, 2026.
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20 DISCOVERY DEMAND
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22 Pursuant to Sections 11507.6, *et seq.* of the *Administrative Procedure Act*, the
23 Department hereby makes demand for discovery pursuant to the guidelines set forth in the
24 *Administrative Procedure Act*. Failure to provide Discovery to the Department may result in the
25 exclusion of witnesses and documents at the hearing or other sanctions that the Office of
26 Administrative Hearings deems appropriate.
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