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FILED

JAN 10 2008

DEPARTMENT OF REAL ESTATE

By Jean Arment

BEFORE THE DEPARTMENT OF REAL ESTATE

STATE OF CALIFORNIA

* * *

In the Matter of the Accusation of)	No. H-4064 SAC
ALL PROFESSIONAL REALTY, INC.,)	
Respondent.)	

ORDER GRANTING REINSTATEMENT OF LICENSE

On March 5, 2005, in Case No. H-4064 SAC, a Decision was rendered revoking the corporate real estate broker license of Respondent effective April 5, 2005, but granting Respondent the right to the issuance of a restricted corporate real estate broker license. A restricted corporate real estate broker license was issued to Respondent on April 5, 2005, and Respondent has operated as a restricted licensee since that time.

On April 5, 2007, Respondent petitioned for reinstatement of said corporate real estate broker license, and the Attorney General of the State of California has been given notice of the filing of said petition.

///

1 I have considered the petition of Respondent and the
2 evidence and arguments in support thereof. Respondent has
3 demonstrated to my satisfaction that Respondent meets the
4 requirements of law for the issuance to Respondent of an
5 unrestricted corporate real estate broker license and that it
6 would not be against the public interest to issue said license to
7 Respondent.

8 NOW, THEREFORE, IT IS ORDERED that Respondent's
9 petition for reinstatement is granted and that a corporate real
10 estate broker license be issued to Respondent if Respondent
11 satisfies the following conditions within nine (9) months from
12 the date of this Order:

13 1. Submittal of a completed application and payment of
14 the fee for a corporate real estate broker license.

15 DATED: _____

16 
17 JEFF DAVI
18 Real Estate Commissioner
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20 _____

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FILED

JAN 10 2008

DEPARTMENT OF REAL ESTATE

By *Jean Deane*

BEFORE THE DEPARTMENT OF REAL ESTATE

STATE OF CALIFORNIA

* * *

In the Matter of the Accusation of)	No. H-4064 SAC
STEVE MARVIN WRIGHT,)
Respondent.)

ORDER GRANTING REINSTATEMENT OF LICENSE

On March 1, 2005, in Case No. H-4064 SAC, a Decision was rendered revoking the real estate broker license of Respondent effective April 5, 2005, but granting Respondent the right to the issuance of a restricted real estate broker license. A restricted real estate broker license was issued to Respondent on April 5, 2005, and Respondent has operated as a restricted licensee since that time.

On April 4, 2007, Respondent petitioned for reinstatement of said real estate broker license, and the Attorney General of the State of California has been given notice of the filing of said petition.

///

1 I have considered the petition of Respondent and the
2 evidence and arguments in support thereof. Respondent has
3 demonstrated to my satisfaction that Respondent meets the
4 requirements of law for the issuance to Respondent of an
5 unrestricted real estate broker license and that it would not be
6 against the public interest to issue said license to Respondent.

7 NOW, THEREFORE, IT IS ORDERED that Respondent's
8 petition for reinstatement is granted and that a real estate
9 broker license be issued to Respondent if Respondent satisfies
10 the following conditions within nine (9) months from the date of
11 this Order:

12 1. Submittal of a completed application and payment of
13 the fee for a real estate broker license.

14 2. Submittal of evidence of having, since the most
15 recent issuance of an original or renewal real estate license,
16 taken and successfully completed the continuing education
17 requirements of Article 2.5 of Chapter 3 of the Real Estate Law
18 for renewal of a real estate license.

19 This Order shall be effective immediately.

20 DATED: _____

21 JEFF DAVI
22 Real Estate Commissioner

23 _____
24 _____
25 _____
26 _____
27 _____

1 DEPARTMENT OF REAL ESTATE
2 P. O. Box 187007
3 Sacramento, CA 95818-7007
4 Telephone: (916) 227-0789

FILED
MAR 16 2005

DEPARTMENT OF REAL ESTATE

By K. Contreras

8 BEFORE THE DEPARTMENT OF REAL ESTATE
9 STATE OF CALIFORNIA

10 * * *

11 In the Matter of the Accusation of)
12) NO. H-4064 SAC
13 ALL PROFESSIONAL REALTY INC.,)
14 and STEVE MARVIN WRIGHT,) STIPULATION AND AGREEMENT
15 Respondents.)

16 It is hereby stipulated by and between ALL PROFESSIONAL
17 REALTY INC., and STEVE MARVIN WRIGHT (hereafter Respondents),
18 represented by C. Breck Jones, Jones & Kerr, Attorneys at Law,
19 and the Complainant, acting by and through Deidre L. Johnson,
20 Counsel for the Department of Real Estate, as follows for the
21 purpose of settling and disposing the Accusation filed on
22 August 5, 2004 in this matter:

23 1. All issues which were to be contested and all
24 evidence which was to be presented by Complainant and Respondents
25 at a formal hearing on the Accusation, which hearing was to be
26 held in accordance with the provisions of the Administrative
27 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 each received, read and understand
4 the Statement to Respondent, and the Discovery Provisions of the
5 APA filed by the Department of Real Estate in this proceeding.

6 3. On August 13, 2004, Respondents filed their Notice
7 of Defense pursuant to Section 11505 of the Government Code for
8 the purpose of requesting a hearing on the allegations in the
9 Accusation. Respondents hereby freely and voluntarily withdraw
10 said Notice of Defense. Respondents acknowledge that they each
11 understand that by withdrawing said Notice of Defense they will
12 thereby waive their rights to require the Commissioner to prove
13 the allegations in the Accusation at a contested hearing held in
14 accordance with the provisions of the APA, and that they will
15 waive other rights afforded to them in connection with the
16 hearing such as the right to present evidence in defense of the
17 allegations in the Accusation and the right to cross-examine
18 witnesses.

19 4. Respondents, pursuant to the limitations set forth
20 below, hereby admit that the factual allegations pertaining to
21 them in Paragraphs I through V of the Accusation filed in this
22 proceeding are true and correct and the Real Estate Commissioner
23 shall not be required to provide further evidence of such
24 allegations.

25 5. Without admitting the truth of the allegations
26 contained in the rest of the Accusation as to each Respondent,
27 Respondents stipulate that they will not interpose a defense

1 thereto. This Stipulation is based on the factual allegations
2 contained in the Accusation as found below. In the interests of
3 expedience and economy, Respondents each choose not to contest
4 the allegations that pertain to them, but to remain silent, and
5 understand that, as a result thereof, these factual allegations,
6 without being admitted or denied, will serve as a basis for the
7 disciplinary action stipulated to herein. The Real Estate
8 Commissioner shall not be required to provide further evidence to
9 prove said factual allegations.

10 6. Respondents have received, read and understand the
11 "Notice Concerning Costs of Audits." Respondents ALL
12 PROFESSIONAL REALTY INC., and STEVE MARVIN WRIGHT understand, by
13 agreeing to this Stipulation and Agreement, and after the
14 findings set forth below in the "Determination of Issues" become
15 final, that the Commissioner may charge Respondents ALL
16 PROFESSIONAL REALTY INC., and STEVE MARVIN WRIGHT, jointly and
17 severally, for the costs of the following audits that have been
18 and may be conducted pursuant to Section 10148 of the Business
19 and Professions Code:

- 20 (a) Audit #SC02-0078/SC02-0103 dated
21 February 21, 2003:
22 Not more than \$4,899.12;
- 23 (b) Future follow-up audit: Not more than
24 \$5,000.00.

25 7. It is understood by the parties that the Real
26 Estate Commissioner may adopt the Stipulation and Agreement as
27 the decision in this matter thereby imposing the penalty and

1 sanctions on the real estate licenses and license rights of
2 Respondents as set forth in the below "Order". In the event that
3 the Commissioner in his discretion does not adopt the Stipulation
4 and Agreement, it shall be void and of no effect, and Respondents
5 shall each retain the right to a hearing and proceeding on the
6 Accusation under all the provisions of the APA and shall not be
7 bound by any admission or waiver made herein.

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

15 * * *

16 DETERMINATION OF ISSUES

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

22 I

23 The acts and/or omissions of Respondent ALL
24 PROFESSIONAL REALTY INC., as stipulated above violate Section
25 10145 of the California Business and Professions Code (hereafter
26 the Code), and Sections 2831.2, 2832.1, 2832, and 2835 of
27 Title 10, California Code of Regulations, and constitute grounds

1 for disciplinary action under the provisions of Section 10177(d)
2 of the Code.

3 II

4 The acts and/or omissions of Respondent STEVE MARVIN
5 WRIGHT as stipulated above constitute grounds for disciplinary
6 action under the provisions of Section 10177(h) of the Code.

7 * * *

8 ORDER

- 9 A. All real estate license(s) and license rights of Respondents
10 ALL PROFESSIONAL REALTY INC., and STEVE MARVIN WRIGHT are
11 hereby revoked.
- 12 B. A restricted real estate broker corporation license shall be
13 issued to Respondent ALL PROFESSIONAL REALTY INC., and a
14 restricted real estate broker license and/or designated
15 broker officer license shall be issued to Respondent STEVE
16 MARVIN WRIGHT pursuant to Section 10156.6 of the Code, if
17 they each make application therefor and pay to the Department
18 the appropriate fee for each license within ninety (90) days
19 of the effective date of the Order.
- 20 C. The restricted licenses issued to Respondents shall be
21 subject to all of the provisions of Section 10156.7 of the
22 Business and Professions Code and to the following conditions
23 and limitations imposed under authority of Section 10156.6 of
24 said Code:
- 25 1) Respondents ALL PROFESSIONAL REALTY INC., and STEVE MARVIN
26 WRIGHT shall, prior to and as a condition of the issuance
27 of said restricted licenses, submit proof satisfactory to

1 the Commissioner of having cured the trust fund shortage
2 alleged in Paragraph VIII of the Accusation.

- 3 2) Respondent STEVE MARVIN WRIGHT shall, prior to and as a
4 condition of the issuance of his restricted license,
5 submit proof satisfactory to the Commissioner of having
6 taken and completed the continuing education course on
7 trust fund accounting and handling specified in
8 paragraph (3) of subdivision (a) of Section 10170.5 of
9 the Business and Professions Code from an approved
10 continuing education course provider. Said course may
11 have been completed within one hundred and twenty (120)
12 days prior to the effective date of the order herein.
- 13 3) The restricted licenses issued to Respondents may each be
14 suspended prior to hearing by order of the Real Estate
15 Commissioner in the event of each Respondent's conviction
16 or plea of nolo contendere to a crime which bears a
17 substantial relationship to that Respondent's fitness or
18 capacity as a real estate licensee.
- 19 4) The restricted licenses may be suspended prior to hearing
20 by Order of the Real Estate Commissioner on evidence
21 satisfactory to the Commissioner that Respondents have
22 violated provisions of the California Real Estate Law,
23 the Subdivided Lands Law, Regulations of the Real Estate
24 Commissioner or conditions attaching to the restricted
25 license.
- 26 5) Respondents shall not be eligible to apply for the
27 issuance of an unrestricted real estate license, nor the

1 removal of any of the conditions of the restricted
2 license, until two (2) years have elapsed from the
3 effective date of this Order.

4 6) Pursuant to Section 10148 of the Business and Professions
5 Code, Respondents, jointly and severally, shall pay the
6 Commissioner's reasonable cost for the following audits
7 as a result of the above found violations:

8 (a) Audit #SC02-0078/SC02-0103 dated
9 February 21, 2003:
10 Not more than \$4,899.12;

11 (b) Future follow-up audit: Not more than
12 \$5,000.00.

13 In calculating the amount of the Commissioner's
14 reasonable costs for each audit, the Commissioner may use
15 the estimated average hourly salary for all Department
16 Audit Section personnel performing audits of real estate
17 brokers, and shall include an allocation for travel time
18 to and from the auditor's place of work. Respondents ALL
19 PROFESSIONAL REALTY INC., and STEVE MARVIN WRIGHT, jointly
20 and severally, shall pay such costs within sixty (60)
21 days of receiving an invoice from the Commissioner
22 detailing the activities performed during each audit and
23 the amount of time spent performing those activities.
24 The Commissioner may suspend the restricted licenses
25 issued to Respondents pending a hearing held in
26 accordance with Section 11500, et seq., of the Government
27 Code, if payment is not timely made as provided for

1 herein, or as provided for in a subsequent agreement
2 between Respondent and the Commissioner. The suspensions
3 shall remain in effect until payment is made in full for
4 each audit or until Respondents enter into an agreement
5 satisfactory to the Commissioner to provide for payment,
6 or until a decision providing otherwise is adopted
7 following a hearing held pursuant to this condition.

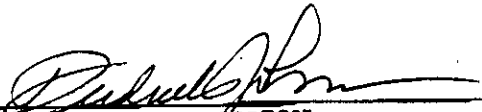
8 7) Respondent STEVE MARVIN WRIGHT shall, within nine (9)
9 months from the effective date of this Order, present
10 evidence satisfactory to the Real Estate Commissioner
11 that Respondent has, since the most recent issuance of
12 an original or renewal real estate license, taken and
13 successfully completed the continuing education
14 requirements of Article 2.5 of Chapter 3 of the Real
15 Estate Law for renewal of a real estate license. If
16 Respondent fails to satisfy this condition, the
17 Commissioner may order the suspension of the restricted
18 license until the Respondent presents such evidence. The
19 Commissioner shall afford Respondent the opportunity for
20 hearing pursuant to the Administrative Procedure Act to
21 present such evidence.

22 8) Respondent STEVE MARVIN WRIGHT shall, within six (6)
23 months from the effective date of this Decision, take
24 and pass the Professional Responsibility Examination
25 administered by the Department including the payment of
26 the appropriate examination fee. If Respondent fails to
27 satisfy this condition, the Commissioner may order

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suspension of the restricted license until Respondent passes the examination.

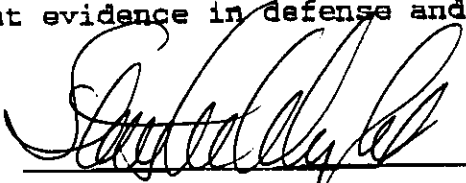
December 28, 2004
DATED


DEIDRE L. JOHNSON
Counsel for Complainant

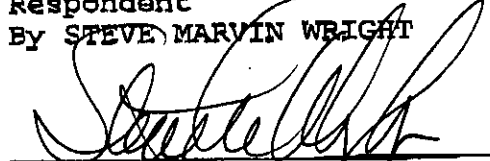
* * *

I have read the Stipulation and Agreement, have 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.

12/17/04
DATED


ALL PROFESSIONAL REALTY INC.
Respondent
By STEVE MARVIN WRIGHT

12/17/04
DATED


STEVE MARVIN WRIGHT
Respondent

APPROVED AS TO FORM:

Dec 16, 2004
DATED


C. BRECK JONES
Attorney for Respondents


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The foregoing Stipulation and Agreement is hereby
adopted as my Decision and shall become effective at 12 o'clock
noon on April 5, 2005.

IT IS SO ORDERED 3-1, 2005.

JEFF DAVI
Real Estate Commissioner



FILED
AUG 30 2004

**BEFORE THE DEPARTMENT OF REAL ESTATE
STATE OF CALIFORNIA**

DEPARTMENT OF REAL ESTATE

By Kathleen Contreras

In the Matter of the Accusation of

ALL PROFESSIONAL REALTY, INC., AND
STEVE MARVIN WRIGHT,

}
}

Case No. H-4064 SAC

OAH No. N-2004080508

Respondents

NOTICE OF HEARING ON ACCUSATION

To the above named respondents:

You are hereby notified that a hearing will be held before the Department of Real Estate at

THE OFFICE OF ADMINISTRATIVE HEARINGS

560 J STREET, SUITES 340/360

SACRAMENTO, CALIFORNIA 95814

on **DECEMBER 20, 2004, and DECEMBER 21, 2004**, at the hour of **9:00 AM**, or as soon thereafter as the matter can be heard, upon the Accusation served upon you. If you object to the place of hearing, you must notify the presiding administrative law judge of the Office of Administrative Hearings within ten (10) days after this notice is served on you. Failure to notify the presiding administrative law judge within ten days will deprive you of a change in the place of the hearing.

You may be present at the hearing. You have the right to be represented by an attorney at your own expense. You are not entitled to the appointment of an attorney to represent you at public expense. You are entitled to represent yourself without legal counsel. If you are not present in person nor represented by counsel at the hearing, the Department may take disciplinary action against you based upon any express admission or other evidence including affidavits, without any notice to you.

You may present any relevant evidence and will be given full opportunity to cross-examine all witnesses testifying against you. You are entitled to the issuance of subpoenas to compel the attendance of witnesses and the production of books, documents or other things by applying to the Department of Real Estate.

The hearing shall be conducted in the English language. If you want to offer the testimony of any witness who does not proficiently speak the English language, you must provide your own interpreter and pay his or her costs. The interpreter must be certified in accordance with Sections 11435.30 and 11435.55 of the Government Code.

DEPARTMENT OF REAL ESTATE

Dated: AUGUST 27, 2004

By Deidre L. Johnson
DEIDRE L. JOHNSON, Counsel

1 DEIDRE L. JOHNSON, Counsel
SBN 66322
2 Department of Real Estate
P. O. Box 187007
3 Sacramento, CA 95818-7007
4 Telephone: (916) 227-0789

FILED
AUG 05 2004

DEPARTMENT OF REAL ESTATE

By Kathleen Contreras

BEFORE THE DEPARTMENT OF REAL ESTATE
STATE OF CALIFORNIA

* * *

In the Matter of the Accusation of)
11) NO. H-4064 SAC
ALL PROFESSIONAL REALTY INC.,)
12 and STEVE MARVIN WRIGHT,) ACCUSATION
13)
Respondents.)

14 The Complainant, CHARLES W. KOENIG, a Deputy Real
15 Estate Commissioner of the State of California, for causes of
16 Accusation against ALL PROFESSIONAL REALTY INC., and STEVE MARVIN
17 WRIGHT is informed and alleges as follows:

PRELIMINARY ALLEGATIONS

I

20 Respondents ALL PROFESSIONAL REALTY INC., and STEVE
21 MARVIN WRIGHT are presently licensed and/or have license rights
22 under the Real Estate Law, Part 1 of Division 4 of the California
23 Business and Professions Code (hereafter the Code).

II

25 The Complainant, CHARLES W. KOENIG, a Deputy Real Estate
26 Commissioner of the State of California, makes this Accusation
27 against Respondents in his official capacity and not otherwise.

1 III

2 At all times herein mentioned, Respondent ALL
3 PROFESSIONAL REALTY INC. (hereafter APRI) was and is licensed by
4 the Department of Real Estate (hereafter the Department) as a
5 real estate broker corporation.

6 IV

7 At all times mentioned, Respondent STEVE MARVIN WRIGHT
8 (hereafter WRIGHT) was and is licensed by the Department as an
9 individual real estate broker, and as designated broker officer of
10 APRI. WRIGHT was and is majority shareholder and chief executive
11 officer of APRI, and directed and controlled its activities.

12 V

13 At least within the last three years, APRI engaged in
14 activities on behalf of others for which a real estate license is
15 required, including but not limited to activities under Section
16 10131(b) of the Code, for or in expectation of compensation, and
17 leased or rented, offered to lease or rent, solicited prospective
18 tenants, collected rents on, and/or managed certain real properties
19 in California.

20 FIRST CAUSE OF ACCUSATION

21 VI

22 Beginning in January of 2003, the Department conducted
23 an audit of the business activities of APRI for a period of time
24 from about January 1, 2000 to November 30, 2002 (hereafter the
25 audit period), as more particularly set forth in Audit Report
26 SC02-0078/SC02-0103, dated February 21, 2003, and all accompanying
27 working papers and exhibits.

1 VII

2 During the course of the activities described above,
3 APRI received and disbursed funds in trust on behalf of others,
4 and deposited the trust funds into the following accounts at
5 American River Bank in Fair Oaks, California:

6 (a) Bank Account #1: Account No. 310028057, entitled
7 "All Professional Realty, Inc. DBA Century 21
8 Property Management," used primarily as the main bank
9 account to handle trust funds related to property
10 owners; and

11 (b) Trust Account #2: Account No. 310022769, entitled
12 "All Professional Realty, Inc. DBA Century 21
13 Property Management Trust," used primarily to handle
14 security deposits from tenants related to property
15 owners.

16 VIII

17 In connection with the collection and disbursement of
18 the above trust funds, APRI failed to deposit and maintain the
19 trust funds allocated to Bank Account #1 in said account, or in a
20 neutral escrow depository, or to deliver them into the hands of
21 the owners of the funds as required by Section 10145 of the Code,
22 in such a manner that as of November 30, 2002, there was a trust
23 fund shortage as to Bank Account #1 in the approximate sum of
24 \$80,075.11.

25 IX

26 Some or all of the trust fund shortage as to Bank
27 Account No. #1, as alleged in Paragraph VIII above, was caused by

1 negative account balances in the sum of approximately \$30,976.79,
2 caused by disbursements from Bank Account #1 on behalf of owners
3 when they had insufficient funds, and negative unidentified
4 disbursements from Bank Account #1 in the approximate sum of
5 \$49,098.32.

6 X

7 In connection with the receipt and disbursement of
8 trust funds as above alleged, Respondent APRI:

9 (a) Failed to deposit trust funds into a trust account
10 in the name of Respondent APRI as trustee at a bank
11 or other financial institution, in conformance with
12 Section 10145 of the Code and Section 2832 of Title
13 10, California Code of Regulations (hereafter the
14 Regulations);

15 (b) Failed to reconcile the balance of separate
16 beneficiary or transaction records with the control
17 records of trust funds received and disbursed for
18 Bank Account #1 at least once a month, and/or
19 failed to maintain a record of such reconciliations
20 in conformance with Section 2831.2 of the Regulations;

21 (c) Failed to obtain the prior written consent of the
22 principals for the reduction of the aggregate
23 balance of trust funds in Bank Account #1 to an
24 amount less than the existing aggregate trust fund
25 liability to the owners of said funds, in
26 conformance with Section 2832.1 of the Regulations;
27 and

1 (d) Commingled funds belonging to Respondents in the
2 sum of approximately \$74,140.39 with trust funds
3 belonging to others.

4 XI

5 The acts and/or omissions of Respondent APRI as alleged
6 above constitute grounds for disciplinary action under the
7 following provisions:

- 8 (a) As to Paragraph VII(a) and X(a), under Section
9 10145 of the Code and Section 2832 of the
10 Regulations in conjunction with Section 10177(d)
11 of the Code;
- 12 (b) As to Paragraphs VIII and IX, under Section 10145
13 of the Code in conjunction with Section 10177(d)
14 of the Code;
- 15 (c) As to Paragraph X(b), under Section 2831.2 of the
16 Regulations in conjunction with Section 10177(d)
17 of the Code;
- 18 (d) As to Paragraph X(c), under Section 2832.1 of the
19 Regulations in conjunction with Section 10177(d)
20 of the Code; and
- 21 (e) As to Paragraph X(d), under Section 10176(e) of
22 the Code, and under Section 2835 of the Regulations
23 in conjunction with Section 10177(d) of the Code.

24 SECOND CAUSE OF ACCUSATION

25 XII

26 Within the last three years, Respondent WRIGHT failed
27 to exercise reasonable supervision over the property management

1 activities of APRI. In particular, WRIGHT permitted, ratified
2 and/or caused the conduct described above to occur and failed
3 to take reasonable steps, including but not limited to the
4 establishment of policies, rules, procedures, and systems to
5 review, oversee, inspect and manage trust fund handling, bank
6 accounts for trust funds, and trust account records of APRI; and
7 a system for monitoring compliance with such policies, rules,
8 procedures and systems, to ensure compliance by the company with
9 the Real Estate Law.

10 XIII

11 The acts and/or omissions of Respondent WRIGHT alleged
12 in XII above violate Section 2725 of the Regulations, and
13 constitute cause for disciplinary action pursuant to Sections
14 10177(d) and 10177(h) of the Code.

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

22
23
24 
25 CHARLES W. KOEMIG
Deputy Real Estate Commissioner

26 Dated at Sacramento, California,

27 this 27th day of July, 2004