

1 Bureau of Real Estate  
1651 Exposition Blvd.  
2 Sacramento, CA 95815  
3 (916) 263-8943

**FILED**

MAY 14 2015

BUREAU OF REAL ESTATE

By 

8 BEFORE THE BUREAU OF REAL ESTATE

9 STATE OF CALIFORNIA

10 \* \* \*

11 In the Matter of the Accusation of ) CalBRE No. H-04617 SD  
12 ) OAH No. 2014051224  
13 WINCHESTER FUNDING GROUP, INC. and )  
14 SEAN GUILLAUME O'SULLIVAN, )  
15 individually and as designated officer of )  
16 Winchester Funding Group, Inc., )  
17 Respondents. )

18 ORDER ACCEPTING VOLUNTARY SURRENDER OF REAL ESTATE LICENSE

19 On April 11, 2014, an Accusation was filed in this matter against Respondent  
20 WINCHESTER FUNDING GROUP, INC.

21 On March 25, 2015, Respondent WINCHESTER FUNDING GROUP, INC.  
22 petitioned the Commissioner to voluntarily surrender its real estate corporation license pursuant  
23 to Section 10100.2 of the Business and Professions Code.

24 IT IS HEREBY ORDERED that Respondent WINCHESTER FUNDING  
GROUP, INC.'s petition for voluntary surrender of its real estate corporation license is accepted  
as of the effective date of this Order as set forth below, based upon the understanding and  
agreement expressed in Respondent's Declaration dated March 25, 2015, (attached as Exhibit

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"A" hereto). Respondent's license certificate, pocket card and any branch office license certificate shall be sent to the below listed address so that they reach the Bureau on or before the effective date of this Order:

Bureau of Real Estate  
Attn: Licensing Flag Section  
P.O. Box 137013  
Sacramento, CA 95813-7013

This Order shall become effective at 12 o'clock noon on JUN - 3 2015

DATED: MAY 8, 2015

REAL ESTATE COMMISSIONER



By: JEFFREY MASON  
Chief Deputy Commissioner

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BEFORE THE BUREAU OF REAL ESTATE  
STATE OF CALIFORNIA

\* \* \*

In the Matter of the Accusation of  
WINCHESTER FUNDING GROUP, INC. and  
SEAN GUILLAUME O'SULLIVAN,  
individually and as designated officer for  
Winchester Funding Group, Inc.,  
  
Respondents.

CALBRE NO. H-04617 SD  
OAH NO. 2014051224

DECLARATION

My name is SEAN GUILLAUME O'SULLIVAN and I am an officer of  
WINCHESTER FUNDING GROUP, INC., which is licensed as a real estate broker and/or has  
license rights with respect to said license. I am authorized and empowered to sign this  
declaration on behalf of WINCHESTER FUNDING GROUP, INC. I am acting on behalf of  
WINCHESTER FUNDING GROUP, INC. in this matter. WINCHESTER FUNDING GROUP,  
INC. is represented by attorney Robert F. Hahn in this matter.

In lieu of proceeding in this matter in accordance with the provisions of the  
Administrative Procedure Act (Sections 11400 et seq., of the Government Code) WINCHESTER

1 FUNDING GROUP, INC. wishes to voluntarily surrender its real estate license, issued by the  
2 Bureau of Real Estate ("Bureau"), pursuant to Business and Professions Code Section 10100.2.

3 I understand that WINCHESTER FUNDING GROUP, INC. by so voluntarily  
4 surrendering its license, can only have it reinstated in accordance with the provisions of Section  
5 11522 of the Government Code. I also understand that by so voluntarily surrendering its license,  
6 WINCHESTER FUNDING GROUP, INC. agrees to the following:

7 The filing of this Declaration shall be deemed as its petition for voluntary  
8 surrender. It shall also be deemed to be an understanding and agreement by WINCHESTER  
9 FUNDING GROUP, INC. that, it waives all rights it has to require the Commissioner to prove  
10 the allegations contained in the Accusation filed in this matter at a hearing held in accordance  
11 with the provisions of the Administrative Procedure Act (Government Code Sections 11400 et  
12 seq.), and that it also waives other rights afforded to it in connection with the hearing such as the  
13 right to discovery, the right to present evidence in defense of the allegations in the Accusation  
14 and the right to cross-examine witnesses. I further agree on behalf of WINCHESTER  
15 FUNDING GROUP, INC. that upon acceptance by the Commissioner as evidenced by an  
16 appropriate order, all affidavits and all relevant evidence obtained by the Bureau in this matter  
17 prior to the Commissioner's acceptance and all allegations contained in the Accusation filed in  
18 the Bureau Case No. H-04617 SD may be considered by the Bureau to be true and correct for the  
19 purpose of deciding whether or not to grant reinstatement of WINCHESTER FUNDING  
20 GROUP, INC.'s license pursuant to Government Code Section 11522.

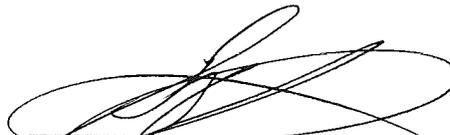
21 A copy of the Commissioner's Criteria of Rehabilitation is attached hereto. If and  
22 when a petition application is made for reinstatement of a surrendered license, the Real Estate  
23 Commissioner will consider as one of the criteria of rehabilitation, whether or not restitution has  
24 been made to any person who has suffered monetary losses through "substantially related" acts  
25 or omissions of Respondent, whether or not such persons are named in the investigation file in  
26 this case.

1 I further agree on behalf of WINCHESTER FUNDING GROUP, INC. to pay the  
2 Commissioner's reasonable cost for the audit which led to this action in the amount of \$12,000.  
3 In calculating the amount of the Commissioner's reasonable cost, the Commissioner may use the  
4 estimated average hourly salary for all persons performing audits of real estate brokers, and shall  
5 include an allocation for travel time to and from the auditor's place of work. I will pay such cost  
6 within 60 days of receiving an invoice from the Commissioner detailing the activities performed  
7 during the audit and the amount of time spent performing those activities.

8 I am aware that if WINCHESTER FUNDING GROUP, INC. petitions for  
9 reinstatement in the future, that payment of the audit costs will be a condition of reinstatement.

10 I declare under penalty of perjury under the laws of the State of California that the  
11 above is true and correct and that I am acting freely and voluntarily on behalf of WINCHESTER  
12 FUNDING GROUP, INC. to surrender its license and all license rights attached thereto.

13  
14  
15 3-25-15  
Date and Place



WINCHESTER FUNDING GROUP, INC.  
By: Sean Guillaume O'Sullivan