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FILED

AUG - 2 2016

BUREAU OF REAL ESTATE

By *Q. Delo*

BEFORE THE BUREAU OF REAL ESTATE

STATE OF CALIFORNIA

* * *

In the Matter of the Accusation of)	No. H-04822 SD
)	
PRIME INVESTORS CORPORATION)	<u>A C C U S A T I O N</u>
and RICHARD MORELOS ALVAREZ,)	
as designated officer of PRIME)	
INVESTORS CORPORATION,)	
)	
Respondents.)	
)	

The Complainant, Veronica Kilpatrick, a Supervising Special Investigator of the State of California, for cause of Accusation against PRIME INVESTORS CORPORATION and RICHARD MORELOS ALVAREZ, as designated officer of PRIME INVESTORS CORPORATION, ("Respondents"), is informed and alleges as follows:

1.

The Complainant, Veronica Kilpatrick, acting in her official capacity as a Supervising Special Investigator of the State of California, makes this Accusation against PRIME INVESTORS CORPORATION and RICHARD MORELOS ALVAREZ.

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Accusation of Prime Investors Corporation and Richard Morelos Alvarez

1 2.

2 Respondent PRIME INVESTORS CORPORATION ("PRIME INVESTORS")
3 presently has license rights under the Real Estate Law, Part 1 of Division 4 of the California
4 Business and Professions Code ("Code"), as a corporate real estate broker.

5 3.

6 Respondent RICHARD MORELOS ALVAREZ ("ALVAREZ") presently has
7 license rights as the designated officer of PRIME INVESTORS.

8 FIRST CAUSE OF ACTION

9 (LACK OF GOOD STANDING FOR CORPORATION)

10 4.

11 Respondent PRIME INVESTORS's corporation license was suspended by the
12 Secretary of State for the State of California on January 2, 2015, and remains suspended to date.

13 5.

14 This lack of good standing of Respondent PRIME INVESTORS with the
15 Secretary of State for the State of California, as described in Paragraph 3 above, is in violation
16 of Section 2742 of Title 10, Chapter 6, California Code of Regulations, and subjects its real
17 estate license and license rights to suspension or revocation pursuant to Code
18 Sections 10177(d), 10177(f), and/or 10177(g).

19 SECOND CAUSE OF ACTION

20 (FAILURE TO SUPERVISE)

21 6.

22 The conduct, acts, or omissions of Respondent ALVAREZ, as described in
23 Paragraphs 4 and 5, in failing to ensure compliance of the Real Estate Law by Respondent
24 PRIME INVESTORS, is in violation of Code Section 10159.2, and subjects his real estate
25 license and license rights to suspension or revocation pursuant to Code Sections 10177(d),
26 10177(g) and/or 10177(h).

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THIRD CAUSE OF ACTION
(FRAUD OR DISHONEST DEALING)

7.

On or about February 9, 2016, in response to a question from a Bureau of Real Estate investigator, to wit, "Can you please send me a list of the current listings you and your agents have as of 2/9/2016", Respondent ALVAREZ replied in writing, "The listings I have (agents have none) are properties I own. All the others we had, have all expired and they were commercial only, no residential."

8.

On or about February 9, 2016, Respondents PRIME INVESTORS and ALVAREZ was advertising a listing that was not expired to sell real property that was not owned by ALVAREZ.

9.

The conduct described in Paragraphs 7 and 8 above involves dishonesty, fraud, or deceit, which constitutes cause for the suspension or revocation of all real estate licenses and license rights of Respondents PRIME INVESTORS and ALVAREZ under the provisions of Code Section 10177(j).

10.

Code Section 10106 provides, in pertinent part, that in any order issued in resolution of a disciplinary proceeding before the Bureau of Real Estate, 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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1 WHEREFORE, Complainant prays that a hearing be conducted on the
2 allegations of this Accusation and that upon proof thereof, a decision be rendered imposing
3 disciplinary action against all the licenses and license rights of Respondent PRIME
4 INVESTORS CORPORATION and RICHARD MORELOS ALVAREZ under the Real Estate
5 Law, for the cost of investigation and enforcement as permitted by law, and for such other and
6 further relief as may be proper under other applicable provisions of law.

7
8 Dated at San Diego, California

9 this 25th day of July, 2016

10
11 V. Kilpatrick
12 Veronica Kilpatrick
13 Supervising Special Investigator
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15 cc: PRIME INVESTORS CORPORATION
16 Richard Morelos Alvarez
17 Veronica Kilpatrick
18 Sacto.
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