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FILED

JAN 10 2018

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)

No. H-04964 SD

12 J RAY BAKER COMPANY and)
13 JAY BARRY BAKER,)
14 individually and as designated officer)
of J Ray Baker Company,)

ACCUSATION

15 Respondents.)

16 The Complainant, Veronica Kilpatrick, a Supervising Special Investigator of the
17 State of California, for cause of Accusation against J RAY BAKER COMPANY and JAY
18 BARRY BAKER, individually and as designated officer of J Ray Baker Company, alleges as
19 follows:

20 1.

21 The Complainant, Veronica Kilpatrick, a Supervising Special Investigator of the
22 State of California, makes this Accusation in her official capacity.

23 2.

24 All references to the "Code" are to the California Business and Professions Code
25 and all references to "Regulations" are to Title 10, Chapter 6, California Code of Regulations.
26

1 BRE LICENSE HISTORY

2 3.

3 JAY BARRY BAKER

4 A. Respondent JAY BARRY BAKER ("BAKER") is presently licensed and/or
5 has license rights under the Real Estate Law (Part 1 of Division 4 of the Code) as a restricted real
6 estate broker ("restricted REB" or "RREB"), California Bureau of Real Estate ("BRE" or
7 "Bureau" or CalBRE) license ID 00768921.

8 B. BAKER was originally licensed by the Bureau as a REB on or about November
9 13, 1981. On or about August 26, 1997, in CalBRE (CalDRE) Case No. H-2283 SD, BAKER's
10 REB was revoked pursuant to Code Section 10177(d) for his violation of Code Section 10145
11 and Regulations 2830, 2832.1, and 2834, and he was granted the right to apply for and be issued
12 a restricted REB license.

13 C. BAKER's BRE mailing and main address of record are the same: 344 E.
14 Grand Ave., Escondido, CA 92025 ("Escondido address").

15 D. According to BRE records to date, ALONGE has two (2) DBAs under his BRE
16 license, for: (1) Baker Baker & Sons, active as of August 26, 1997 and (2) Exclusive Property
17 Management, active as of August 26, 1997.

18 E. According to BRE records to date, BAKER has no branch offices.

19 F. BAKER is the designated officer ("D.O.") of record for J RAY BAKER
20 COMPANY until his officer expiration date of August 25, 2021.

21 G. BAKER's BRE license will expire on August 25, 2021.

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1 BRE AUDIT OF J RAY BAKER COMPANY

2 (SD 150027)

3 6.

4 On April 29, 2016, the BRE completed an audit examination of the books and
5 records of Respondent JRBC pertaining to its property management activities described in
6 Paragraphs 7 through 9, below, which require a real estate license. The audit examination
7 covered a period of time beginning on November 1, 2014 and ending on November 30, 2015
8 ("audit examination period" or "audit period"), and was performed between January 12, 2016
9 and March 22, 2016 ("field work period"), during which the D.O. of JRBC was BAKER. The
10 final report of March 29, 2016 revealed violations of the Code and the Regulations as set forth in
11 the following paragraphs, and more fully discussed in Audit Report SD 150027.

12 7.

13 JRBC's Business Activities & Corporate Structure

14 At all times mentioned in San Diego County, California, Respondent JRBC acted
15 as a real estate broker, and ordered, caused, authorized or participated in licensed activities
16 within the meaning of Code Section 10131(b), wherein JRBC engaged in property management
17 activities, and leased or rented or offered to lease or rent, or placed for rent, or solicited listings
18 of places for rent, or solicited for prospective tenants, or negotiated the sale, purchase or
19 exchanges of leases on real property, or on a business opportunity, or collected rent from real
20 property, or improvements thereon, or from business opportunities ("property management").

21 8.

22 JRBC's Corporate Structure

23 According to D.O. BAKER, the corporate structure of JRBC as of January 12,
24 2016 was: he is the President, Director, and fifty-percent (50%) owner of JRBC, and Lee Baker
25 (D.O. Baker's spouse) is the Secretary, Director and other fifty-percent (50%) owner of JRBC.
26
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1 Also according to D.O. BAKER, JRBC is named after his father J. Ray Baker, and the two RES
2 employed by JRBC, J.A.B. and M.D.B., are his (D.O. BAKER) sons.

3 9.

4 JRBC's Property Management Activities

5 A. According to D.O. BAKER, JRBC manages: seventy-four (74) one- to four-
6 family residences with 103 units; four (4) apartment complexes with forty-one (41) units; and
7 eight (8) single commercial/business units for sixty-two (62) owners and JRBC collects rents,
8 pays expenses, and screens tenants for compensation. According to BAKER, in 2015, JRBC
9 collected approximately \$2.47 million in trust funds. Also according to BAKER, JRBC's policy
10 is to not accept cash, but occasionally a tenant will pay with cash at JRBC's office. JRBC
11 charges a management fee of between five percent (5%) to ten percent (10%) of collected rents;
12 some single family residences are charged a flat amount ranging from \$100 to \$150 per month;
13 and some commercial properties were charged a \$100 lease execution/renewal fee.

14 B. During the audit examination period, both J.A.B. and M.D.B. were employed
15 by JRBC as RES, with J.A.B. involved with the residential property management activities and
16 M.D.B. involved with the commercial property management activities.

17 C. JRBC also managed two (2) homeowners' associations ("HOA") with a total of
18 137 doors and total monthly receipts of \$7,260.00. The HOAs were not part of the BRE's audit
19 examination.

20 10.

21 JRBC's Other Real Estate Sales Activities

22 According to D.O. BAKER, JRBC also engaged in occasional real estate sales
23 activities within the meaning of Code Section 10131(a) ("real estate sales"). As of January 12,
24 2016, JRBC had one transaction in escrow. JRBC does not perform broker escrow or mortgage
25 loan activities.

Bank Accounts

A. According to D.O. BAKER and to the books and records provided, JRBC maintained seven (7) bank accounts at Wells Fargo Bank, 145 N. Escondido Blvd., Escondido, CA 92025, for the receipts and disbursements of trust funds in connection with its property management activities during the audit examination period. The bank accounts that were sampled for the BRE audit are:

Bank Account 1 ("BA 1")

- * Account Name: "J Ray Baker Co," "J Ray Baker Real Estate Trust"¹
- * Bank: Wells Fargo Bank, Escondido, CA
- * Account No. #####2699
- * Signatories: BAKER, M.D.B., and J.A.B.
- * Signatures Required: one (1)
- * Date Opened: January 5, 2015

JRBC opened BA1 on or about January 5, 2015 for multiple beneficiaries, and was used as a depository for rents and security deposits collected from tenants. Disbursements from BA 1 were payments for expenses related to the properties managed, owner remittances, and to JRBC for management fees. One (1) signature was required and usually J.A.B. signed the checks. beneficiaries for handling the receipts and disbursements of trust funds received in connection with its property management activities.

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¹ The Account Names per the bank statement are "J Ray Baker Co" and "J Ray Baker Real Estate Trust." The Business Account Application provided information about BA1, but did not indicate the account name or whether the account was designated as a trust account. On 1/13/16, the CalBRE auditor suggested to D.O. BAKER inquire about BA2 at Wells Fargo Bank; on 1/14/16, D.O. BAKER informed the CalBRE auditor that he was surprised to learn that the bank accounts in which JRBC deposited funds, including BA 1, were not designated as trust accounts by Wells Fargo Bank.

1 Bank Account 2 ("BA2")

2 * Account Name: "J Ray Baker Real Estate Trust Account," "J Ra Baker Co,"
3 "J Barry Baker," "John Ray Baker"²

4 * Bank: Wells Fargo Bank, Escondido, CA

5 * Account No. #####8885

6 * Signatories: BAKER, J.A.B.

7 * Signatures Required: one (1)

8 According to the bank account application, BA2 was opened in December 2008
9 for multiple beneficiaries. Due to the higher amount of trust funds handled for one of the owners
10 (Conway Stanley Properties LLC ("CSP"), D.O. BAKER decided to handle CSP's funds
11 separately from the other owners. On or about January 5, 2015, BA1 was opened and the funds
12 for most of the owners were transferred from BA2 to BA1. As of January 2015, BA2 was used
13 as a depository for rents and security deposits collected from tenants in units owned by CSP.
14 Disbursements from BA2 were payments for expenses related to CSP's properties managed,
15 owner remittances, D.O. BAKER's fees as general manager, and to JRBC for management fees.

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² The Business Account Application provided information about BA2, but did not indicate the account name or
26 whether the account was designated as a trust account. On 1/13/16, the CalBRE auditor suggested to D.O. BAKER
27 inquire about BA2 at Wells Fargo Bank; on 1/14/16, D.O. BAKER informed the CalBRE auditor that he was
 surprised to learn that the bank accounts in which JRBC deposited funds, including BA 1, were not designated as
 trust accounts by Wells Fargo Bank.

1 B. JRBC maintained at least five (5) other accounts in which trust funds were
2 deposited, which were not examined in the BRE audit, and which are listed below. Each account
3 was maintained for a single beneficiary. On January 14, 2015, D.O. BAKER stated that Wells
4 Fargo Bank confirmed that the bank accounts in which trust funds were deposited were not
5 recognized as trust accounts:

6 Bank Account 3 ("BA3")

7 * Account Name: 9th & Orange LLC

8 * Account No. #####4446

9 Bank Account 4 ("BA4")

10 * Account Name: J Ray Baker Trust Acct

11 * Account No. #####2130 (for Valley Parkway Vineyard)

12 Bank Account 5 ("BA5")

13 * Account Name: Lambar Associates LLC

14 * Account No. #####4835

15 Bank Account 5 ("BA6")

16 * Account Name: Lambar Associates LLC

17 * Account No. #####7404

18 Bank Account 5 ("BA7")

19 * Account Name: Lambar Associates LLC

20 * Account No. #####7388

21 Audit Findings: Violations of the Real Estate Law

22 12.

23 In the course of activities as described in Paragraphs 7 through 9, above, and
24 during the audit examination period described in Paragraph 6, Respondent JRBC acted in
25 violation of the Code and the Regulations, as described below:

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Trust Fund Handling for Multiple Beneficiaries (Code Section 10145 and Regulation 2832.1)

Based on the records provided, bank reconciliations were prepared as of November 30, 2015 for BA1 and BA2, and as of December 31, 2014 for BA2. The adjusted bank balance for each account was compared to the total balance of the separate beneficiary records ("accountability")

A. BA 1 (as of 11/30/15)

As of November 30, 2015, BA1 had a shortage of <\$15,087.71> caused by:

- | | |
|--|---------------|
| 1) negative balance of property accounts | <\$14,735.21> |
| 2) unreimbursed bank charge | <\$ 352.50> |

Trust fund shortage in BA1 as of November 30, 2015: <\$15,087.71>

Additionally, as of November 30, 2015, BA1 had unidentified/unaccounted for funds of \$900.00.

B. BA2 (as of 11/30/15)

As of November 30, 2015, BA2 had a shortage of <\$8,442.68> caused by:

- | | |
|--|---------------|
| 1) negative balance of property accounts | <\$ 3,384.20> |
| 2) unreimbursed bank charge | <\$ 243.00> |
| 3) unidentified cause(s) | <\$ 4,815.48> |

Trust fund shortage in BA2 as of November 30, 2015: <\$ 8,442.68>

On November 30, 2015, D.O. BAKER made a \$10,000.00 deposit of his own funds into BA2. On December 30, 2015, post-audit examination, D.O. BAKER made an additional deposit of \$5,715.34 into BA2, which cured the unidentified shortage of <\$4,815.48>.

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1 C. BA2 (as of 12/31/14)

2 As of December 31, 2014, BA2 had a shortage of <\$4,998.20> caused by:

- 3 1) negative balance of property accounts <\$ 631.70>
4 2) unreimbursed bank charge <\$ 133.00>
5 3) unidentified cause(s) <\$ 4,233.50>

6 *Trust fund shortage in BA2 as of December 31, 2014:* <\$ 8,442.68>

7 There was no evidence provided by D.O. BAKER and J.A.B. that the trust fund
8 owners had given JRBC written consent to allow it to reduce the balance of trust funds in BA1
9 and BA2 to an amount less than the aggregate trust fund liabilities, in violation of **Code Section**
10 **10145 and Regulation 2832.1.**

11 14.

12 **Trust Fund Handling – Commingling (Code Sections 10145 and 10176(e) and**
13 **Regulation 2835(a), (b), (c))**

14 During the audit period JRBC kept D.O. BAKER's own funds related to
15 management of properties in which he has an ownership interest in BA1 for over twenty-five
16 (25) days with other property owners' funds. During the audit period, JRBC managed at least
17 four (4) properties in which D.O. BAKER owned 100% and one (1) property in which he owned
18 thirty percent (30%). As of November 30, 2015, BA1 contained \$23,730.73 related to properties
19 in which D.O. BAKER has an ownership interest. As of November 30, 2015, \$13,580.42 of
20 D.O. BAKER's funds remained in BA1, in violation of **Code Sections 10145 and 10176(e)**, and
21 **Regulation 2835(a), (b), and (c).** Examples of dates examined to calculate the amount of D.O.
22 BAKER's funds that remained in BA1 in excess of twenty-five (25) days include:

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<u>Date and Total Balance for Baker's Properties</u>		<u>Disbursements During Next 25 Days</u>	<u>Date and Total Remaining Balance for Baker's Properties</u>	
4/20/15	\$20,070.37	\$11,489.00	5/15/15	\$8,581.37
5/19/15	\$19,914.88	\$5,875.00	6/13/15	\$14,039.88
10/23/15	\$18,684.83	\$8,681.36	11/17/15	\$10,003.47
11/5/15	\$23,730.73	\$10,150.31	11/30/15	\$13,850.42

15.

Trust Fund Handling – Interest-Bearing Accounts

(Code Section 10145(d), (g))

BA1 was an interest bearing account in which trust funds in the account were not kept separate, distinct, and apart from funds belonging to other persons for whom JRBC was holding funds in trust. JRBC did not have the authorization from all owners of trust funds to deposit their funds into an interest bearing account, in violation of **Code Section 10145(d) and (g)**. Additionally, JRBC posted the interest on the broker record that also contained the bank fees. During the period January 5, 2015 through November 30, 2015, BA1 earned a total of \$102.59 in interest; the record also showed a June 12, 2015 bank charge of \$352.50 for bank products. As of November 30, 2015, the separate record indicated a balance of <\$249.91>, which is the net total of the total interest earned (\$102.59) less the bank charge (\$352.50).

16.

Trust Fund Handling – Trust Fund Records to be Maintained

(Code Section 10145 and Regulation 2831)

JRBC failed to maintain an accurate record of trust funds received and disbursed (control record) for BA1, which was used for the receipts and disbursements of trust funds in connection with JRBC's property management activity, in violation of **Code Section 10145 and Regulation 2831**. Based on the records provided, some security deposits that were deposited

1 into BA1 were not posted on the control record; some of the security deposits were posted as a
2 journal entry two (2) to three (3) months after they were received. Additionally, the dates of
3 receipt and dates of deposit were not accurately posted on the control record for BA1.

4 Examples of security deposit transactions posted on the general ledger 1160 Security Deposit
5 cash report, but not reflected on the control record and separate record, or posted on a later date
6 as a journal entry ("JE") on the control record and separate record include:

<u>Tenant Name</u>	<u>Property Address</u>	<u>Date on 1160 Report</u>	<u>Amount on 1160 Report</u>	<u>Date of JE, if posted later</u>
P.	Village Rd.	1/13/15	\$ 1,400.00	JE 4/28/15
L.	David	1/15/15	\$ 1,875.00	
O.	Jordan St.	1/21/15	<\$1,648.00>	
T.	Ranchwood Glen	1/28/15	\$1,500.00	JE 4/28/15
S.	Washington	1/30/15	\$ 500.00	
V.	Kenora	2/3/15	\$1,000.00	
G.	Washington	2/26/15	\$ 500.00	
S.	Washington	3/16/15	\$ 300.00	
B.	Avalon	3/20/15	\$3,400.00	JE 5/11/15
F.	Jordan	3/24/15	\$1,000.00	
B.	Washington	4/3/15	\$ 875.00	
S.	Begonia	4/13/15	\$1,450.00	
C.	Lake Forest	4/17/15	\$1,450.00	

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Examples of dates of receipt and deposit recorded inaccurately include:

<u>Tenant Name</u>	<u>Property Address</u>	<u>Amount Received</u>	<u>Date Received per Records</u>	<u>Deposit Date per Records</u>	<u>Deposit Date per Bank Statement</u>
H.	Washington	\$750.00	4/3/15	4/10/15	4/30/15
B.	Washington	\$430.00	4/3/15	4/1/15	4/24/15
B.	Washington	\$875.00	4/3/15	4/1/15	4/24/15
R.	Escondido	\$1,400.00	10/5/15	10/5/15	10/9/15

17.

**Trust Fund Handling – Separate Records For Each Beneficiary or
Transaction (Code Section 10145(g) and Regulation 2831.1)**

The separate records of trust funds received and disbursed in BA1 were inaccurate, in violation of **Code Section 10145(g) and Regulation 2831.1**.

A. The security deposits were not posted on the separate records, and some security deposits were posted as a journal entry two (2) to three (3) months after they were received (See Paragraph 16., above, for the BRE auditor's findings.)

B. A separate record was not maintained for interest earned in BA1 (See Paragraph 15., above, for the BRE auditor's findings.)

C. As of November 30, 2015, there were unidentified/unaccounted for funds totaling \$900.00, in which a separate record was not maintained.

18.

**Trust Fund Handling – Trust Account Reconciliation (Code Section 10145
and Regulation 2831.2)**

A. During the audit period, JRBC failed to perform and maintain a monthly reconciliation comparing the balance of all separate records to the balance of the record of all

1 trust funds received and disbursed (control record) for BA1 in connection with its property
2 management activity, as required, in violation of **Code Section 10145 and Regulation 2831.2.**

3 B. During the audit period, JRBC failed to perform and maintain a monthly
4 reconciliation comparing the balance of all separate records to the balance of the record of all
5 trust funds received and disbursed (control record) for BA2 in connection with its property
6 management activity, as required, in violation of **Code Section 10145 and Regulation 2831.2.**

7 C. JRBC failed to perform and maintain monthly bank reconciliations. D.O.
8 Baker and J.A.B. informed the BRE auditor that the bank reconciliations had not been performed
9 in many months, and was only performed after BRE's notification of audit.

10 D. JRBC failed to reconcile the unidentified/unaccounted for funds of \$900.00 in
11 BA1 as of November 30, 2015, in violation of **Code Section 10145 and Regulation 2831.2.**

12 19.

13 **Trust Fund Handling – Trust Account Designation (Code Section 10145 and**
14 **Regulation 2832)**

15 Although BA1 and BA2 (and BA3, BA4, BA5, BA6, and BA7) are accounts used
16 by JRBC to hold trust funds that are received and disbursed in connection with JRBC's property
17 management activities, they were not properly designated as trust accounts in the name of JRBC
18 as trustee, in violation of **Code Section 10145 and Regulation 2832.** On January 15, 2016,
19 D.O. BAKER stated to the BRE auditor that he was surprised to learn that accounts BA1 through
20 BA7 were not designated as trust accounts.

21 A. A bank signature card for BA1 was not provided for audit. However, a Wells
22 Fargo business account application for BA1 was provided by D.O. BAKER. The BA1
23 application indicated that the purpose of BA1 was "general operating account" with J. Ray Baker
24 as the sole owner, and the bank statements were addressed as "J Ray Baker Co; J Ray Baker Real
25 Estate Trust."

B. A bank signature card for BA2 was not provided for audit. However, a Wells Fargo business account application for BA2 was provided by D.O. BAKER. The BA2 bank statements were addressed as "J Ray Baker Real Estate Trust Account; J Ray Baker Co; J Barry Baker; John Ray Baker."

20.

Trust Fund Handling – Timely Deposits (Code Section 10145 and Regulation 2832)

JRBC collected trust funds in the form of rent receipts and security deposits and failed to place said funds in BA1 within three (3) business days of receipt, in violation of Code Section 10145 and Regulation 2832.

Examples of such untimely deposits include:

<u>Tenant Name</u>	<u>Property Address</u>	<u>Amount Received</u>	<u>Date per Deposit Slip</u>	<u>Date per Records</u>	<u>Deposit Date per Bank Statement</u>
C.	W. 11 th	\$1,425.00	n/a	7/30/15	"Deposit in Transit" ³
B.	E. Washington	\$ 430.00	4/1/15	4/3/15	4/24/15
B.	E. Washington	\$ 875.00	4/1/15	4/3/15	4/24/15
H.	E. Washington	\$ 750.00	4/30/15	4/3/15	4/30/15
S.	E. Washington	\$2,889.92	4/30/15	4/10/15	4/30/15

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³ This \$1,425.00 security deposit could not be traced to BA1 during the audit period, but it was included in the bank reconciliation as a "Deposit in Transit" dated 7/31/15. According to D.O. BAKER and J.A. B, a monthly bank reconciliation was not performed in many months. Upon notice of the BRE audit, J.A.B. performed the monthly bank reconciliation and found unreconciled deposits. This deposit was made on 1/11/16, prior to the beginning of the BRE auditor's field work period.

21.

Trust Fund Handling – Trust Account Withdrawals (Code Section 10145 and Regulation 2834)

J.A.B. and M.D.B., both licensed RES employees of JRBC, were signatories allowed to make withdrawals from BA1, BA2, BA3, BA4, BA5, BA6, and BA7, all of which contained trust funds. Cancelled checks showed that J.A.B. signed most of the checks in BA1 and BA2. There was no written authorization from D.O. BAKER for J.A.B. and M.D.B. to sign on accounts that contain trust funds, in violation of **Code Section 10145 and Regulation 2834**.

22.

Disclosure of License ID Number on Solicitation Materials (Code Section 10140.6 and Regulation 2773)

The license identification numbers of JRBC, D.O. BAKER, RES J.A.B., and RES M.D.B. were not disclosed on solicitation materials, specifically on JRBC's website and business cards, in violation of **Code Section 10140.6 and Regulation 2773**.

23.

Responsibility of Corporate Officer in Charge/Broker Supervision – D.O. BAKER (Code Sections 10159.2 and 10177(h) and Regulation 2725)

The acts and/or omissions of D.O. BAKER as described in Paragraphs 13 through 22 above, demonstrate a failure to adequately supervise the real estate activities of JRBC, its salespersons, and its employees to ensure compliance with the Real Estate laws and regulations. JRBC/BAKER failed to maintain a complete and accurate control record, separate records, and failed to maintain trust account reconciliations for JRBC's property management activity. JRBC comingled BAKER's funds for over twenty-five (25) days with funds belonging to other property owners. JRBC/BAKER maintained an interest-bearing account without obtaining authorization from the owners of the trust funds. JRBC/BAKER failed to maintain properly designated trust

1 accounts in the name of JRBC as trustee. JRBC/BAKER collected trust funds and failed to
2 timely deposit said trust funds within three (3) business days of receipt. JRBC/BAKER allowed
3 J.A.B. to sign on accounts containing trust funds without providing written authorization for
4 J.A.B. to do so. JRBC/BAKER did not disclose the BRE license identification numbers of
5 themselves or their RES on solicitation materials. These acts and/or failures to act constitute
6 grounds for the suspension or revocation of the license and license rights of Respondent BAKER
7 under the provisions of **Code Sections 10159.2 and 10177(h) and Regulation 2725.**

8 Additional Violations of the Real Estate Law

9 24.

10 The overall conduct of Respondents JRBC and BAKER is violative of the Real
11 Estate Law and constitutes cause for the suspension or revocation of the real estate licenses and
12 license rights of JRBC and BAKER under the provisions of **Code Section 10177(g)** for
13 negligence and **Code Section 10177(d)** for willful disregard of the Real Estate Law.

14 COSTS

15 Investigation and Enforcement Costs

16 25.

17 **Code Section 10106** provides, in pertinent part, that in any order issued in
18 resolution of a disciplinary proceeding before the Bureau of Real Estate, the Commissioner may
19 request the administrative law judge to direct a licensee found to have committed a violation of
20 this part to pay a sum not to exceed the reasonable costs of the investigation and enforcement of
21 the case.

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Audit Costs

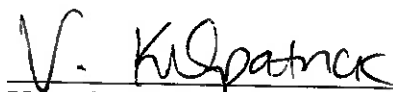
26.

Code Section 10148(b) provides, in pertinent part, the Commissioner shall charge a real estate broker for the cost of any audit, if the Commissioner has found in a final decision following a disciplinary hearing that the broker has violated Code section 10145 or a regulation or rule of the Commissioner interpreting said section.

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 the licenses and license rights of Respondents J RAY BAKER COMPANY and JAY BARRY BAKER under the Real Estate Law (Part 1 of vision 4 of the Business and Professions Code), for the 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, and for costs of audit.

Dated at San Diego, California

this 4 day of January, 2018.


Veronica Kilpatrick
Supervising Special Investigator

cc: J RAY BAKER COMPANY
JAY BARRY BAKER
V. Kilpatrick
Sacto.
Audits – J. Borromeo