

FEB - 7 2001

by Kathleen Contreras

* * *

NO. H-7718 SF

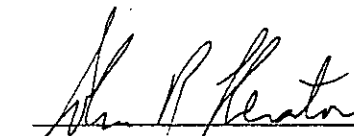
IT IS HEREBY ORDERED that the effective dates of the Decisions of the Real Estate Commissioner of December 18, 2000, are stayed for a period of thirty (30) days.

///

1 The Decisions of the Real Estate Commissioner of
2 December 18, 2000, shall become effective at 12 o'clock noon on
3 March 9, 2001.

4 DATED: February 6, 2001.

5
6 PAULA REDDISH ZINNEBANN
7 Real Estate Commissioner

8
9 By: 

10 JOHN R. LIBERATOR
11 Chief Deputy Commissioner
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FEB - 7 2001

by Kathleen Contreras

* * *

NO. H-7718 SF

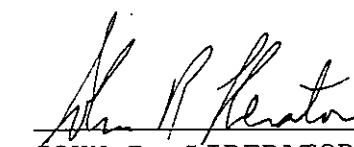
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10 JOHN R. LIBERATOR
11 Chief Deputy Commissioner
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By Kathleen Contreras

* * *

NO. H-7718 SF

STIPULATION AND AGREEMENT

1 submitted solely on the basis of the provisions of this
2 Stipulation and Agreement.

3 2. Respondent has received, read and understands the
4 Statement to Respondent, and the Discovery Provisions of the APA
5 filed by the Department of Real Estate in this proceeding.

6 3. On July 6, 1999, Respondent filed his Notice of
7 Defense pursuant to Section 11505 of the Government Code for the
8 purpose of requesting a hearing on the allegations in the
9 Accusation. Respondent hereby freely and voluntarily withdraws
10 said Notice of Defense. Respondent acknowledges that he
11 understands that by withdrawing said Notice of Defense he will
12 thereby waive his rights to require the Commissioner to prove the
13 allegations in the Accusation at a contested hearing held in
14 accordance with the provisions of the APA, and that he will waive
15 other rights afforded to him in connection with the hearing such
16 as the right to present evidence in defense of the allegations in
17 the Accusation and the right to cross-examine witnesses.

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

23 5. Without admitting the truth of the allegations
24 contained in the remaining paragraphs of the Accusation,
25 Respondent stipulates that he will not interpose a defense
26 thereto. This Stipulation is based on the factual allegations as
27 to Respondent contained in the Accusation. In the interests of

expedience and economy, Respondent chooses not to contest these allegations, but to remain silent and understands that, as a result thereof, these factual allegations, without being admitted or denied, will serve as the basis for the disciplinary action stipulated to herein. The Real Estate Commissioner shall not be required to provide further evidence to prove said factual allegations.

6. It is understood by the parties that the Real Estate Commissioner may adopt the Stipulation and Agreement as the decision in this matter thereby imposing the penalty and sanctions on the real estate licenses and license rights of Respondent, as set forth in the below "Order". In the event that the Commissioner in her discretion does not adopt the Stipulation and Agreement, it shall be void and of no effect, and Respondent shall retain the rights to a hearing and proceeding on the Accusation under all the provisions of the APA and shall not be bound by any admission or waiver made herein.

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

DETERMINATION OF ISSUES

1 By reason of the foregoing stipulations, admissions and
2 waivers, and for the purpose of settlement of the pending
3 Accusation as to Respondent without a hearing, it is stipulated
4 and agreed that the following determination of issues shall be
5 made:

6 The acts and/or omissions of Respondent as stipulated
7 above constitute grounds for the suspension or revocation of all
8 real estate license and license rights of Respondent under the
9 provisions of Section 10177(g) of the California Business and
10 Professions Code.

11 ORDER

12
13 A. All real estate licenses and license rights of
14 Respondent STEVEN ALAN KROGSTAD shall be suspended for a period
15 of sixty (60) days from the effective date of the Decision.

16 B. Thirty (30) days of said suspension are stayed for
17 a period of one (1) year upon the following terms and conditions:

- 18 (1) Respondent shall obey all laws, rules and
19 regulations governing the rights, duties and
20 responsibilities of a real estate licensee in the
21 State of California; and,
22 (2) The Commissioner may, if a final subsequent
23 determination is made, after hearing or upon
24 stipulation, that cause for disciplinary action
25 against the licenses of Respondent has occurred
26 within one (1) year from the effective date of the
27 Decision, vacate and set aside the stay order

1 and reimpose all or a portion of the stayed
2 suspension. Should no order vacating the stay be
3 made pursuant to this condition, the stay imposed
4 herein as to Respondent shall become permanent.

5 C. If Respondent petitions the Department in writing
6 pursuant to Section 10175.2 of the Code prior to the effective
7 date of the Decision, the remaining thirty (30) days of said
8 suspension shall be stayed upon condition that:

9 (1) Respondent shall pay a monetary penalty pursuant
10 to Section 10175.2 of the Code at the rate of
11 \$50.00 for each day of suspension for a total
12 monetary penalty of \$ 1,500.00.

13 (2) Said payment shall be in the form of a cashier's
14 check or certified check made payable to the
15 Recovery Account of the Real Estate Fund. Said
16 check must be received by the Department prior to
17 the effective date of the Decision in this matter.

18 (3) No further cause for disciplinary action against
19 the real estate license of Respondent occurs
20 within one (1) year from the effective date of the
21 Decision.

22 (4) If Respondent fails to pay the monetary penalty in
23 accordance with the terms and conditions of the
24 Decision, the Commissioner may, without a hearing,
25 order the immediate execution of all or any part
26 of the stayed suspension, in which event,
27 Respondent shall not be entitled to any repayment

1 nor credit, prorated or otherwise, for money paid
2 to the Department under the terms of this
3 Decision.

4 (5) If Respondent pays the monetary penalty and if no
5 further cause for disciplinary action against the
6 real estate licenses of Respondent occurs within
7 one (1) year from the effective date of the
8 Decision, the stay hereby granted in this
9 condition and in condition B above to Respondent
10 shall become permanent.

11 (6) If the Real Estate Commissioner determines that
12 further cause for disciplinary action against
13 Respondent has occurred within one (1) year from
14 the effective date of the Decision, the stay of
15 suspension hereby granted to Respondent, or such
16 portion of the stay as the Real Estate
17 Commissioner shall deem appropriate, shall be
18 vacated.

19
20
21 9/14/00

22 DATED

23 Larry Alamao
24 LARRY A. ALMAO
25 Counsel for the Complainant

26 * * *

1 I have read the Stipulation and Agreement, understand
2 that I have the right to consult counsel, or have consulted
3 counsel, and its terms are understood by me and are agreeable and
4 acceptable to me. I understand that I am waiving rights given to
5 me by the California Administrative Procedure Act, and I
6 willingly, intelligently and voluntarily waive those rights,
7 including the right of requiring the Commissioner to prove the
8 allegations in the Accusation at a hearing at which I would have
9 the right to cross-examine witnesses against me and to present
10 evidence in defense and mitigation of the charges.

11
12
13 9/6/00
14 _____
15 DATED

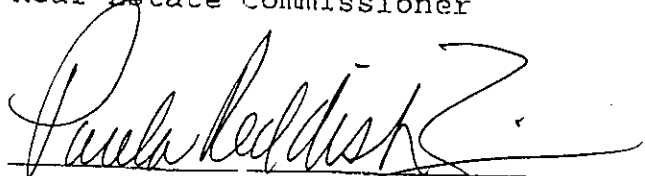
16
17 
18 STEVEN ALAN KROGSTAD
19 Respondent

20 * * *

21 The foregoing Stipulation and Agreement is hereby
22 adopted as my Decision and shall become effective at 12 o'clock
23 noon on February 7, 2001.

24 IT IS SO ORDERED December 18, 2000.

25 PAULA REDDISH ZINNEMANN
26 Real Estate Commissioner

27 

DEPARTMENT OF REAL ESTATE
P. O. Box 187000
Sacramento, CA 95818-7000
Telephone: (916) 227-0789

FILED
JAN 18 2001

DEPARTMENT OF REAL ESTATE

By Kathleen Contreras

BEFORE THE DEPARTMENT OF REAL ESTATE
STATE OF CALIFORNIA

* * *

In the Matter of the Accusation of)
ANTHONY PHILLIP PIAZZA,)
Respondent.)

NO. H-7718 SF
STIPULATION AND AGREEMENT

It is hereby stipulated by and between ANTHONY PHILLIP PIAZZA (hereafter Respondent), and the Complainant, acting by and through Larry A. Alamao, Counsel for the Department of Real Estate, as follows for the purpose of settling and disposing the Accusation filed on June 30, 1999, in this matter:

1. All issues which were to be contested and all evidence which was to be presented by Complainant and Respondent at a formal hearing on the Accusation, which hearing was to be held in accordance with the provisions of the Administrative Procedures Act (APA), shall instead and in place thereof be submitted solely on the basis of the provisions of this Stipulation and Agreement.

1 2. Respondent has received, read and understands the
2 Statement to Respondent, and the Discovery Provisions of the APA
3 filed by the Department of Real Estate in this proceeding.

4 3. On July 6, 1999, Respondent filed his Notice of
5 Defense pursuant to Section 11505 of the Government Code for the
6 purpose of requesting a hearing on the allegations in the
7 Accusation. Respondent hereby freely and voluntarily withdraws
8 said Notice of Defense. Respondent acknowledges that he
9 understands that by withdrawing said Notice of Defense he will
10 thereby waive his rights to require the Commissioner to prove the
11 allegations in the Accusation at a contested hearing held in
12 accordance with the provisions of the APA, and that he will waive
13 other rights afforded to him in connection with the hearing such
14 as the right to present evidence in defense of the allegations in
15 the Accusation and the right to cross-examine witnesses.

16 4. Respondent, pursuant to the limitations set forth
17 below, hereby admits that the factual allegations in Paragraphs I
18 through V of the Accusation filed in this proceeding are true and
19 correct and the Real Estate Commissioner shall not be required to
20 provide further evidence of such allegations.

21 5. Without admitting the truth of the allegations
22 contained in the remaining paragraphs of the Accusation,
23 Respondent stipulates that he will not interpose a defense
24 thereto. This Stipulation is based on the factual allegations as
25 to Respondent contained in the Accusation. In the interests of
26 expedience and economy, Respondent chooses not to contest these
27 allegations, but to remain silent and understands that, as a

1 result thereof, these factual allegations, without being admitted
2 or denied, will serve as the basis for the disciplinary action
3 stipulated to herein. The Real Estate Commissioner shall not be
4 required to provide further evidence to prove said factual
5 allegations.

6 6. It is understood by the parties that the Real
7 Estate Commissioner may adopt the Stipulation and Agreement as
8 the decision in this matter thereby imposing the penalty and
9 sanctions on the real estate licenses and license rights of
10 Respondent, as set forth in the below "Order". In the event
11 that the Commissioner in her discretion does not adopt the
12 Stipulation and Agreement, it shall be void and of no effect,
13 and Respondent shall retain the rights to a hearing and
14 proceeding on the Accusation under all the provisions of the
15 APA and shall not be bound by any admission or waiver made
16 herein.

17 7. The Order or any subsequent Order of the Real
18 Estate Commissioner made pursuant to this Stipulation and
19 Agreement shall not constitute an estoppel, merger or bar to any
20 further administrative or civil proceedings by the Department of
21 Real Estate with respect to any matters which were not
22 specifically alleged to be causes for accusation in this
23 proceeding.

24
25 DETERMINATION OF ISSUES

26 By reason of the foregoing stipulations, admissions
27 and waivers, and for the purpose of settlement of the pending

1 Accusation as to Respondent without a hearing, it is stipulated
2 and agreed that the following determination of issues shall be
3 made:

4 The acts and/or omissions of Respondent as stipulated
5 above violate Section 10240 of the California Business and
6 Professions Code (hereafter the Code), and constitute grounds for
7 the suspension or revocation of all real estate license and
8 license rights of Respondent under the provisions of Section
9 10177(d) of the Code.

10 ORDER

11
12 A. All real estate licenses and license rights of
13 Respondent ANTHONY PHILLIP PIAZZA shall be suspended for a period
14 of sixty (60) days from the effective date of the Decision.

15 B. Thirty (30) days of said suspension are stayed for
16 a period of one (1) year upon the following terms and conditions:

17 (1) Respondent shall obey all laws, rules and
18 regulations governing the rights, duties and
19 responsibilities of a real estate licensee in
20 the State of California; and,

21 (2) The Commissioner may, if a final subsequent
22 determination is made, after hearing or upon
23 stipulation, that cause for disciplinary
24 action against the licenses of Respondent has
25 occurred within one (1) year from the
26 effective date of the Decision, vacate and set
27 aside the stay order and reimpose all or a

1 portion of the stayed suspension. Should no
2 order vacating the stay be made pursuant to
3 this condition, the stay imposed herein as to
4 Respondent shall become permanent.

5 C. If Respondent petitions the Department in writing
6 pursuant to Section 10175.2 of the Code prior to the effective
7 date of the Decision, the remaining thirty (30) days of said
8 suspension shall be stayed upon condition that:

9 (1) Respondent shall pay a monetary penalty
10 pursuant to Section 10175.2 of the Code at the
11 rate of \$50.00 for each day of suspension for
12 a total monetary penalty of \$ 1,500.00.

13 (2) Said payment shall be in the form of a
14 cashier's check or certified check made
15 payable to the Recovery Account of the Real
16 Estate Fund. Said check must be received by
17 the Department prior to the effective date of
18 the Decision in this matter.

19 (3) No further cause for disciplinary action
20 against the real estate license of Respondent
21 occurs within one (1) year from the effective
22 date of the Decision.

23 (4) If Respondent fails to pay the monetary
24 penalty in accordance with the terms and
25 conditions of the Decision, the Commissioner
26 may, without a hearing, order the immediate
27 execution of all or any part of the stayed

1 suspension, in which event, Respondent shall
2 not be entitled to any repayment nor credit,
3 prorated or otherwise, for money paid to the
4 Department under the terms of this Decision.

5 (5) If Respondent pays the monetary penalty and if
6 no further cause for disciplinary action
7 against the real estate licenses of Respondent
8 occurs within one (1) year from the effective
9 date of the Decision, the stay hereby granted
10 in this condition and in condition B above to
11 Respondent shall become permanent.

12 (6) If the Real Estate Commissioner determines
13 that further cause for disciplinary action
14 against Respondent has occurred within one (1)
15 year from the effective date of the Decision,
16 the stay of suspension hereby granted to
17 Respondent, or such portion of the stay as the
18 Real Estate Commissioner shall deem
19 appropriate, shall be vacated.

20
21 8/29/00

22 DATED

21 Larry Alamao

22 LARRY A. ALAMAO

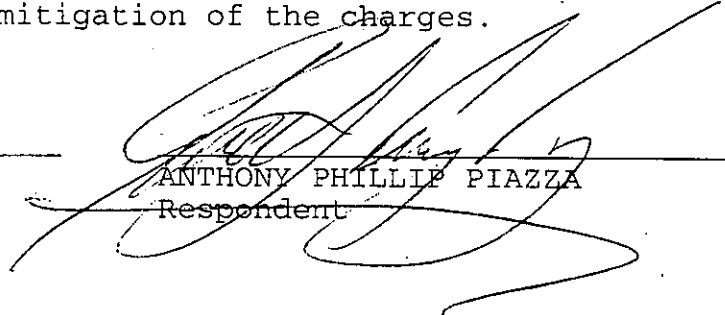
23 Counsel for the Complainant

24 * * *

24 I have read the Stipulation and Agreement, understand
25 that I have the right to consult counsel, or have consulted
26 counsel, and its terms are understood by me and are agreeable and
27 acceptable to me. I understand that I am waiving rights given to

1 me by the California Administrative Procedure Act, and I
2 willingly, intelligently, and voluntarily waive those rights,
3 including the right of requiring the Commissioner to prove the
4 allegations in the Accusation at a hearing at which I would have
5 the right to cross-examine witnesses against me and to present
6 evidence in defense and mitigation of the charges.

7
8 9/1/00
9 DATED

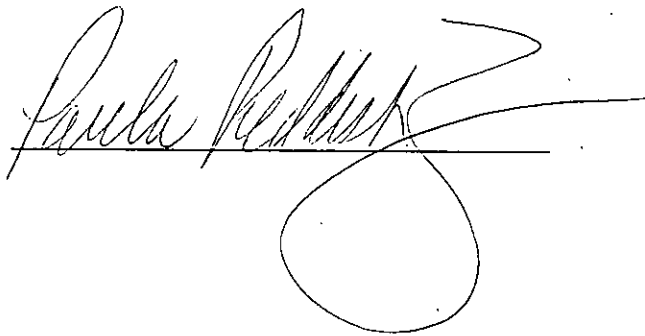

10 ANTHONY PHILLIP PIAZZA
11 Respondent

12 * * *

13 The foregoing Stipulation and Agreement is hereby
14 adopted as my Decision and shall become effective at 12 o'clock
15 noon on February 7, 2001.

16
17 IT IS SO ORDERED December 18, 2000.

18 PAULA REDDISH ZINNEMANN
19 Real Estate Commissioner

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FILED
AUG - 1 2000

BEFORE THE DEPARTMENT OF REAL ESTATE
STATE OF CALIFORNIA

DEPARTMENT OF REAL ESTATE

By Kathleen Contreras

In the Matter of the Accusation of

ANTHONY PHILLIP PIAZZA, and
STEVEN ALAN KROGSTAD,

}

Case No. H-7718 SF

OAH No. N-1999090154

Respondent

FIRST CONTINUED
NOTICE OF HEARING ON ACCUSATION

To the above named respondent:

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

The Office of Administrative Hearings, the Elihu Harris State

Building, 1515 Clay Street, Suite 206, Oakland, California 94612

on September 18, 2000, and September 19, 2000, 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: July 31, 2000

By

Thomas C. Lasken

THOMAS C. LASKEN

Counsel

FILED

NOV 23 1999

BEFORE THE DEPARTMENT OF REAL ESTATE
STATE OF CALIFORNIA

DEPARTMENT OF REAL ESTATE

By Shelly Ely

In the Matter of the Accusation of

ANTHONY PHILLIP PIAZZA, and
STEVEN ALAN KROGSTAD,Case No. H-7718 SFOAH No. N-1999090154Respondent

NOTICE OF HEARING ON ACCUSATION

To the above named respondent:

You are hereby notified that a hearing will be held before the Department of Real Estate at TheOffice of Administrative Hearings, the Elihu Harris StateBuilding, 1515 Clay Street, Suite 206, Oakland, CA 94612

on April 18, 2000 and April 19, 2000, 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: November 10, 1999

By

Thomas C. Lasken

THOMAS C. LASKEN

Counsel

1 THOMAS C. LASKEN, Counsel
2 Department of Real Estate
3 P. O. Box 187000
4 Sacramento, CA 95818-7000

5 Telephone: (916) 227-0789

FILED

JUN 30 1999

DEPARTMENT OF REAL ESTATE

By Jan R. Laska

8 BEFORE THE
9 DEPARTMENT OF REAL ESTATE
10 STATE OF CALIFORNIA

11 * * *

12 In the Matter of the Accusation of)
13 ANTHONY PHILLIP PIAZZA) NO. H-7718 SF
14 and STEVEN ALAN KROGSTAD,)
15 Respondents.) ACCUSATION

16 The Complainant, Les R. Bettencourt, a Deputy Real
17 Estate Commissioner of the State of California, for cause of
18 Accusation against ANTHONY PHILLIP PIAZZA and STEVEN ALAN
19 KROGSTAD, is informed and alleges as follows:

20 FIRST CAUSE OF ACCUSATION

21 I

22 The Complainant, Les R. Bettencourt, a Deputy Real
23 Estate Commissioner of the State of California, makes this
24 Accusation in his official capacity.

25 II

26 At all times herein mentioned, Respondent ANTHONY
27 PHILLIP PIAZZA (hereinafter "Respondent PIAZZA") was licensed

1 and/or had license rights under the Real Estate Law, Part 1 of
2 Division 4 of the Business and Professions Code (hereinafter
3 "Code") as a real estate broker.

4 III

5 At all times herein mentioned until on or about July 2,
6 1998, Respondent STEVEN ALAN KROGSTAD (hereinafter "Respondent
7 KROGSTAD") was licensed, and/or had license rights under the Code
8 as a real estate salesperson employed as such by Respondent
9 PIAZZA. At all times herein mentioned after on or about July 2,
10 1998, Respondent KROGSTAD was licensed, and/or had license rights
11 under the Code, as a real estate broker.

12 IV

13 Whenever reference is made in an allegation in this
14 Accusation to an act or omission of "Respondents", such allegation
15 shall be deemed to mean that Respondents PIAZZA and KROGSTAD
16 committed such act or omissions while engaged in furtherance of
17 the business or operation of Respondent PIAZZA and, as to
18 Respondent KROGSTAD, while acting within the course and scope of
19 his authority and employment.

20 V

21 At all times mentioned herein, Respondents engaged in
22 the business of, acted in the capacity of, advertised or assumed
23 to act as a real estate broker within the State of California,
24 including the operation and conduct of a mortgage loan brokerage
25 business with the public wherein lenders and borrowers were
26 solicited for loans secured directly or collaterally by liens on
27 real property, wherein such loans were arranged, negotiated,

1 processed, and consummated on behalf of others for compensation or
2 in expectation of compensation.

3 VI

4 During the period from approximately March or April,
5 1997, to approximately June, 1997, Respondents, while performing
6 activities requiring a real estate license as described in
7 Paragraph V above, negotiated a loan on behalf of a borrower named
8 William Alvin Burke, to be secured by real property located at
9 14691 Carrier Lane, Guerneville, California.

10 VII

11 At no time during or after the negotiation of the loan
12 described in Paragraph VI above did Respondents deliver to said
13 borrower a true and correct statement with the contents set forth
14 in Section 10241 of the Code. In fact, during or after the
15 negotiation of the loan described in Paragraph VI above,
16 Respondents delivered a statement or statements to said borrower
17 which understated the amount of compensation being paid to
18 Respondents.

19 VIII

20 Respondent PIAZZA's acts and omissions alleged above in
21 Paragraph VII constitute violation of Section 10240(a) of the
22 Code, the making of a substantial misrepresentation, negligence or
23 incompetence in performing acts requiring a real estate license,
24 and failure to exercise reasonable supervision over the activities
25 of a salesperson licensed to him, and are cause for discipline
26 under the provisions of Sections 10176(a), 10177(d), 10177(g), and
27 10177(h) of the Code.

IX

Respondent KROGSTAD's acts and omissions alleged above in Paragraph VII constitute the making of a substantial misrepresentation, and negligence or incompetence in performing acts requiring a real estate license, and are cause for discipline under the provisions of Sections 10176(a) and 10177(g) of the Code.

SECOND CAUSE OF ACCUSATION

X

There is hereby incorporated in this Second, separate and distinct, Cause of Accusation, all of the allegations contained in Paragraphs I through V of the First Cause of Accusation with the same force and effect as if fully set forth herein.

XI

Commencing on June 19, 1998, and continuing through August 12, 1998, an investigative audit was made by the Department of Real Estate (hereinafter "Department") of Respondent PIAZZA's records for the period of March 24, 1997, through August 12, 1998 ("the audit period"), as those records relate to Respondent PIAZZA's licensed activities in his mortgage loan business.

XII

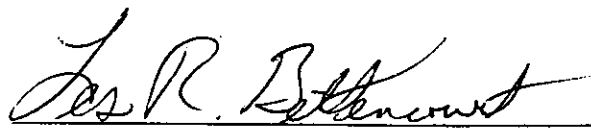
During the audit period, Respondent PIAZZA failed to deliver to borrowers a true and correct statement with the contents set forth in Section 10241 of the Code. In fact, during the audit period, Respondent PIAZZA delivered a statement or statements to borrowers which contained incorrect information

1 regarding current liens and/or anticipated liens on the real
2 property to be used to secure loans to be obtained by borrowers.

3 XIII

4 Respondent PIAZZA's acts and omissions alleged above in
5 Paragraph XII constitute violation of Section 10240(a) of the
6 Code, the making of a substantial misrepresentation, and
7 negligence or incompetence in performing acts requiring a real
8 estate license, and are cause for discipline under the provisions
9 of Sections 10176(a), 10177(d), and 10177(g) of the Code.

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

17
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19
20 
21 LES R. BETTENCOURT
22 Deputy Real Estate Commissioner
23

24 Dated at Oakland, California,
25 this 16th day of June, 1999.
26
27