

1 Department of Real Estate  
2 P.O. Box 187007  
3 Sacramento, CA 95818-7007

4 Telephone: (916) 227-0781

FILED

NOV - 4 2008

DEPARTMENT OF REAL ESTATE

By K. Mar

8 BEFORE THE DEPARTMENT OF REAL ESTATE  
9 STATE OF CALIFORNIA

10 \* \* \*

11 In the Matter of the Accusation of )

12 PACIFIC NORTHWEST MORTGAGE )  
13 CORPORATION, and JANE K SMITH )  
14 WILLIAMS, )

15 Respondent. )

No. H-10393 SF

STIPULATION AND  
AGREEMENT

16 It is hereby stipulated by and between PACIFIC NORTHWEST MORTGAGE  
17 CORPORATION, and JANET SMITH WILLIAMS (hereafter "Respondents") and their  
18 attorney, Jeffrey E. Elliott, and the Complainant, acting by and through Truly Sughrue,  
19 Counsel for the Department of Real Estate, as follows for the purpose of settling and  
20 disposing the Accusation filed on May 8, 2008 in this matter:  
21

22 1. All issues which were to be contested and all evidence which was to be  
23 presented by Complainant and Respondents at a formal hearing on the Accusation, which hearing  
24 was to be held in accordance with the provisions of the Administrative Procedure Act (APA),  
25 shall instead and in place thereof be submitted solely on the basis of the provisions of this  
26 Stipulation and Agreement.  
27

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

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

13                   4. This stipulation is based on the factual allegations contained in the Accusation.  
14 In the interest of expediency and economy, Respondents choose not to contest these factual  
15 allegations, but to remain silent and understands that, as a result thereof, these factual statements  
16 will serve as a prima facie basis for the "Determination of Issues" and "Order" set forth below.  
17 The Real Estate Commissioner shall not be required to provide further evidence to prove such  
18 allegations.  
19

20                   5. This Stipulation and Respondents decision not to contest the Accusation are  
21 made for the purpose of reaching an agreed disposition of this proceeding and are expressly  
22 limited to this proceeding and any other proceeding or case in which the Department of Real  
23 Estate (herein "the Department"), the state or federal government, an agency of this state, or an  
24 agency of another state is involved.  
25

26                   6. Respondents understand that by agreeing to this Stipulation and Agreement,  
27



DETERMINATION OF ISSUES

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

I

6 The acts and omissions of Respondents as described in the Accusation are  
7 grounds for the suspension or revocation of Respondents licenses and license rights under the  
8 following sections of the Code and Regulations:  
9

10 (a) As to Paragraph VI under Section 10240 of the Code in conjunction with  
11 Section 10177(d) of the Code;

12 (b) As to Paragraphs VII and VIII, under Section 2832(d) of the Regulations  
13 in conjunction with Section 10177(f) of the Code;

14 (c) As to Paragraphs IX and X, under Section 2726 of the Regulations in  
15 conjunction with Section 10177(f) of the Code; and  
16

17 (d) As to Paragraph XI, under Section 10160 of the Code and Section 2753 of  
18 the Regulations in conjunction with Section 10177(f) of the Code.

II

19  
20 The acts and/or omissions of Respondent JANET SMITH WILLIAMS  
21 (hereinafter "WILLIAMS") described in the Accusation, constitute failure on the part of  
22 WILLIAMS, as designated broker-officer for PACIFIC NORTHWEST MORTGAGE  
23 CORPORATION (hereinafter "PACIFIC") to exercise reasonable supervision and control over  
24 the licensed activities of PACIFIC required by Section 10159.2 of the Code, and is cause for the  
25  
26  
27

1 suspension or revocation of WILLIAMS license and/or license rights under Section 10177(h) of  
2 the Code.

3 \* \* \*

4 ORDER

5 I

6 All licenses and licensing rights of Respondent PACIFC under the Real Estate Law are  
7 suspended for a period of sixty (60) days from the effective date of this Order; provided,  
8 however, that:

- 9
- 10 1) Thirty (30) days of said suspension shall be stayed, upon the condition that PACIFIC petition  
11 pursuant to Section 10175.2 of the Business and Professions Code and pays a monetary  
12 penalty pursuant to Section 10175.2 of the Business and Professions Code at a rate of \$50 for  
13 each day of the suspension for a total monetary penalty of \$1,500.
- 14
- 15 a) Said payment shall be in the form of a cashier's check or certified check made payable to  
16 the Recovery Account of the Real Estate Fund. Said check must be delivered to the  
17 Department prior to the effective date of the Order in this matter.
- 18
- 19 b) No further cause for disciplinary action against the Real Estate licenses of Respondent  
20 occurs within two (2) years from the effective date of the decision in this matter.
- 21
- 22 c) If Respondent fails to pay the monetary penalty as provided above prior to the effective  
23 date of this Order, the stay of the suspension shall be vacated as to that Respondent and  
24 the order of suspension shall be immediately executed, in which event the said  
25 Respondent shall not be entitled to any repayment nor credit, prorated or otherwise, for  
26 the money paid to the Department under the terms of this Order.
- 27

1 d) If Respondent pays the monetary penalty and any other moneys due under this Stipulation  
2 and Agreement and if no further cause for disciplinary action against the real estate  
3 license of said Respondent occurs within two (2) years from the effective date of this  
4 Order, the entire stay hereby as to said Respondent only, shall become permanent.

5 2) The remaining thirty (30) days of said suspension shall be stayed for two (2) years upon the  
6 following terms and conditions:

7 a) Respondent shall obey all laws, rules and regulations governing the rights, duties and  
8 responsibilities of a real estate licensee in the State of California; and,

9 b) That no final subsequent determination be made, after hearing or upon stipulation, that  
10 cause for disciplinary action occurred within two (2) years from the effective date of this  
11 Order. Should such a determination be made, the Commissioner may, in his discretion,  
12 vacate and set aside the stay order and reimpose all or a portion of the stayed suspension.  
13 Should no such determination be made, the stay imposed herein shall become permanent.

14 3) Pursuant to Section 10148 of the Business and Professions Code, PACIFIC shall jointly and  
15 severally with WILLIAMS pay the sum of \$4,857.37 for the Commissioner's cost of the audit  
16 which led to this disciplinary action. Respondents shall pay such cost within sixty (60) days  
17 of receiving an invoice therefor from the Commissioner. The Commissioner may suspend  
18 the Respondent's license pending a hearing held in accordance with Section 11500, et seq., of  
19 the Government Code, if payment is not timely made as provided for herein, or as provided  
20 for in a subsequent agreement between the Respondent and the Commissioner. The  
21 suspension shall remain in effect until payment is made in full or until Respondent enters into  
22 an agreement satisfactory to the Commissioner to provide for payment, or until a decision  
23 providing otherwise is adopted following a hearing held pursuant to this condition.  
24  
25  
26  
27

1 4) Pursuant to Section 10148 of the Business and Professions Code, PACIFIC shall jointly and  
2 severally with WILLIAMS pay the Commissioner's reasonable cost, not to exceed \$4,857.37,  
3 for an audit to determine if Respondents have corrected the trust fund violation(s) found in  
4 Paragraph I of the Determination of Issues. In calculating the amount of the Commissioner's  
5 reasonable cost, the Commissioner may use the estimated average hourly salary for all  
6 persons performing audits of real estate brokers, and shall include an allocation for travel  
7 time to and from the auditor's place of work. Respondent shall pay such cost within sixty  
8 (60) days of receiving an invoice therefor from the Commissioner detailing the activities  
9 performed during the audit and the amount of time spent performing those activities. The  
10 Commissioner may suspend Respondent's license pending a hearing held in accordance with  
11 Section 11500, et seq., of the Government Code, if payment is not timely made as provided for  
12 herein, or as provided for in a subsequent agreement between Respondent and the  
13 Commissioner. The suspension shall remain in effect until payment is made in full or until  
14 Respondent enters into an agreement satisfactory to the Commissioner to provide for  
15 payment, or until a decision providing otherwise is adopted following a hearing held pursuant  
16 to this condition.  
17  
18

19  
20 II

21 All licenses and licensing rights of Respondent WILLIAMS under the Real Estate Law  
22 are suspended for a period of sixty (60) days from the effective date of this Order; provided,  
23 however, that:

24 1) Thirty (30) days of said suspension shall be stayed, upon the condition that WILLIAMS  
25 petition pursuant to Section 10175.2 of the Business and Professions Code and pays a  
26  
27

1 monetary penalty pursuant to Section 10175.2 of the Business and Professions Code at a rate  
2 of \$50 for each day of the suspension for a total monetary penalty of \$1,500.

3 a) Said payment shall be in the form of a cashier's check or certified check made payable to  
4 the Recovery Account of the Real Estate Fund. Said check must be delivered to the  
5 Department prior to the effective date of the Order in this matter.

6 b) No further cause for disciplinary action against the Real Estate licenses of said  
7 Respondent occurs within two (2) years from the effective date of the decision in this  
8 matter.

9 c) If Respondent fails to pay the monetary penalty as provided above prior to the effective  
10 date of this Order, the stay of the suspension shall be vacated as to that Respondent and  
11 the order of suspension shall be immediately executed, in which event the said  
12 Respondent shall not be entitled to any repayment nor credit, prorated or otherwise, for  
13 the money paid to the Department under the terms of this Order.

14 d) If Respondent pays the monetary penalty and any other moneys due under this Stipulation  
15 and Agreement and if no further cause for disciplinary action against the real estate  
16 license of said Respondent occurs within two (2) years from the effective date of this  
17 Order, the entire stay hereby granted as to said Respondent only, shall become permanent.

18 2) The remaining thirty (30) days of said suspension shall be stayed for two (2) years upon the  
19 following terms and conditions:

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

22 b) That no final subsequent determination be made, after hearing or upon stipulation, that  
23 cause for disciplinary action occurred within two (2) years from the effective date of this  
24

1 Order. Should such a determination be made, the Commissioner may, in his discretion,  
2 vacate and set aside the stay order and reimpose all or a portion of the stayed suspension.

3 Should no such determination be made, the stay imposed herein shall become permanent.

4 3) WILLIAMS shall, prior to the effective date of this Decision, submit proof satisfactory to the  
5 Commissioner of having taken and successfully completed the continuing education course  
6 on trust fund accounting and handling specified in subdivision (a) of Section 10170.5 of the  
7 Business and Professions Code. Proof of satisfaction of this requirement includes evidence  
8 that Respondent has successfully completed the trust fund account and handling continuing  
9 education course within 120 days prior to the effective date of the Decision in this matter. If  
10 Respondent fails to satisfy this condition, the Commissioner may order the suspension of  
11 Respondent's license until Respondent presents proof that she has successfully completed the  
12 trust fund course.  
13

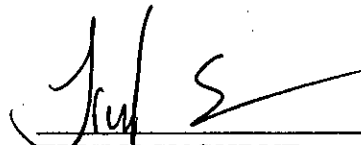
14  
15 4) Pursuant to Section 10148 of the Business and Professions Code, WILLIAMS shall jointly and  
16 severally with PACIFIC pay the sum of \$4,857.37 for the Commissioner's cost of the audit  
17 which led to this disciplinary action. Respondents shall pay such cost within sixty (60) days  
18 of receiving an invoice therefor from the Commissioner. The Commissioner may suspend  
19 Respondent's license pending a hearing held in accordance with Section 11500, et seq., of the  
20 Government Code, if payment is not timely made as provided for herein, or as provided for in  
21 a subsequent agreement between the Respondent and the Commissioner. The suspension  
22 shall remain in effect until payment is made in full or until Respondent enters into an  
23 agreement satisfactory to the Commissioner to provide for payment, or until a decision  
24 providing otherwise is adopted following a hearing held pursuant to this condition.  
25

26  
27 5) Pursuant to Section 10148 of the Business and Professions Code, WILLIAMS shall jointly and

1 severally with PACIFIC pay the Commissioner's reasonable cost, not to exceed \$4,857.37,  
2 for an audit to determine if Respondents have corrected the trust fund violation(s) found in  
3 Paragraph I of the Determination of Issues. In calculating the amount of the Commissioner's  
4 reasonable cost, the Commissioner may use the estimated average hourly salary for all  
5 persons performing audits of real estate brokers, and shall include an allocation for travel  
6 time to and from the auditor's place of work. Respondent shall pay such cost within sixty  
7 (60) days of receiving an invoice therefor from the Commissioner detailing the activities  
8 performed during the audit and the amount of time spent performing those activities. The  
9 Commissioner may suspend Respondent's license pending a hearing held in accordance with  
10 Section 11500, et seq., of the Government Code, if payment is not timely made as provided for  
11 herein, or as provided for in a subsequent agreement between Respondent and the  
12 Commissioner. The suspension shall remain in effect until payment is made in full or until  
13 Respondent enters into an agreement satisfactory to the Commissioner to provide for  
14 payment, or until a decision providing otherwise is adopted following a hearing held pursuant  
15 to this condition.  
16  
17  
18  
19

20 16 Oct 08

21 DATED

22   
23 TRULY SUGHRUE  
24 Counsel for Complainant

25 \* \* \*

26 I have read the Stipulation and Agreement, discussed it with my counsel, and its  
27 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,

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

5  
 6 OCT. 14, 2008  
 7 DATED

Bruce A. Williams v.p.  
 PACIFIC NORTHWEST MORTGAGE  
 CORPORATION  
 Respondent

8  
 9 Oct. 14, 2008  
 10 DATED

Janet Smith Williams  
 JANET SMITH WILLIAMS  
 Respondent

11  
 12 *I have reviewed the Stipulation and Agreement as to form and content and have*  
 13 *advised my client accordingly.*

14  
 15 10/17/2008  
 16 DATED

Jeffrey E. Elliott  
 JEFFREY E. ELLIOTT  
 Attorney for Respondents

17  
 18 The foregoing Stipulation and Agreement is hereby adopted as my Decision and  
 19 shall become effective at 12 o'clock noon on \_\_\_\_\_, 2008.

20  
 21 IT IS SO ORDERED \_\_\_\_\_, 2008.

22 JEFF DAVI  
 Real estate Commissioner

23  
 24  
 25 \_\_\_\_\_

26  
 27

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

5  
6 \_\_\_\_\_  
7 DATED

\_\_\_\_\_   
PACIFIC NORTHWEST MORTGAGE  
CORPORATION  
Respondent

9  
10 \_\_\_\_\_  
11 DATED

\_\_\_\_\_   
JANET SMITH WILLIAMS  
Respondent

12 *I have reviewed the Stipulation and Agreement as to form and content and have*  
13 *advised my client accordingly.*

14  
15 \_\_\_\_\_  
16 DATED

\_\_\_\_\_   
JEFFREY E. ELLIOTT  
Attorney for Respondents

17 \* \* \*

18 The foregoing Stipulation and Agreement is hereby adopted as my Decision and  
19 shall become effective at 12 o'clock noon on **NOV 25 2008**

20  
21 IT IS SO ORDERED 10/31/08

22 JEFF DAVI  
23 Real estate Commissioner

24  
25   
26

27 BY: Barbara J. Bigby  
Chief Deputy Commissioner

1 TRULY SUGHRUE, Counsel  
2 State Bar No. 223266  
3 Department of Real Estate  
4 P.O. Box 187007  
5 Sacramento, CA 95818-7007  
6  
7 Telephone: (916) 227-0781

FILED

MAY - 8 2008

DEPARTMENT OF REAL ESTATE

By K. Mar

8 BEFORE THE DEPARTMENT OF REAL ESTATE  
9 STATE OF CALIFORNIA

10 \* \* \*

11 In the Matter of the Accusation of )  
12 ) No. H- 10393 SF  
13 PACIFIC NORTHWEST MORTGAGE )  
14 CORPORATION, and JANE SMITH ) ACCUSATION  
15 WILLIAMS, )  
16 Respondents. )

17 The Complainant, E. J. HABERER II, a Deputy Real Estate  
18 Commissioner of the State of California, for cause of Accusation  
19 against PACIFIC NORTHWEST MORTGAGE CORPORATION, and JANE SMITH  
20 WILLIAMS, (hereinafter "Respondents"), are informed and alleges  
21 as follows:

22 PRELIMINARY ALLEGATIONS

23 I

24 The Complainant, E. J. HABERER II, a Deputy Real Estate  
25 Commissioner of the State of California, makes this Accusation in  
26 his official capacity.

27 \\\  
\\

1  
2  
3  
4  
5  
6  
7  
8  
9  
10  
11  
12  
13  
14  
15  
16  
17  
18  
19  
20  
21  
22  
23  
24  
25  
26  
27

II

Respondents are presently licensed and/or has license rights under the Real Estate Law, Part 1 of Division 4 of the Business and Professions Code (hereinafter "Code").

III

At all times herein mentioned, PACIFIC NORTHWEST MORTGAGE CORPORATION, (hereinafter "PACIFIC") was and is licensed by the State of California Department of Real Estate (hereinafter "Department") as a real estate broker corporation.

IV

At all times herein mentioned, Respondent JANE SMITH WILLIAMS, (hereinafter "WILLIAMS") was and is licensed by the Department individually and as the designated broker officer of PACIFIC. As said designated officer-broker, WILLIAMS was and now is responsible pursuant to Section 10159.2 of the Code for the supervision of the activities of the officers, agents, real estate licensees and employees of PACIFIC for which a license is required.

V

At all times mentioned herein Respondents engaged in the business of, acted in the capacity of, advertised or assumed to act as a real estate broker in the State of California within the meaning of:

(a) Section 10131(a) of the Code, including the operation and conduct of a real estate resale brokerage with the public wherein, on behalf of others, for compensation or in

1 expectation of compensation, Respondents sold and offered to  
2 sell, bought and offered to buy, solicited prospective sellers  
3 and purchasers of, solicited and obtained listings of, and  
4 negotiated the purchase and resale of real property; and

5 (b) Section 10131(d) of the Code, including the  
6 operation and conduct of a mortgage loan brokerage business with  
7 the public wherein Respondents solicited lenders and borrowers  
8 for loans secured directly or collaterally by liens on real  
9 property or a business opportunity, and wherein such loans were  
10 arranged, negotiated, processed, and consummated by Respondent on  
11 behalf of others for compensation or in expectation of a  
12 compensation.

13 FIRST CAUSE OF ACTION

14 VI

15 In connection with the mortgage loan brokerage  
16 business described in Paragraph V(b), Respondents violated  
17 and/or willfully failed to comply with Section 10240 of the  
18 Code, in that Respondents:

19 (a) failed to cause to be delivered to the borrowers  
20 the written Disclosure Statement required by Section 10241 of  
21 the Code;

22 (b) failed to obtain the signature of the borrowers  
23 on any Written Disclosure Statement; and/or

24 (c) failed to retain on file for a period of three  
25 years a true and correct copy of any Written Disclosure  
26 Statement signed by the borrowers.

27 \\\

VII

1  
2 In a home sales transaction involving offeror, Krisgian  
3 and Cynthia Octabiano, Respondents failed to place the offeror's  
4 check into a neutral escrow depository or the trust fund account,  
5 or into the hands of the offeree not later than three business  
6 days following acceptance of the offer in violation of Section  
7 2832(d), Title 10, California Code of Regulations (hereinafter  
8 the "Regulations").

9 VIII

10 In a home sales transaction involving offeror, Evelyn  
11 Guerrero, Respondents failed to place the offeror's check into a  
12 neutral escrow depository or the trust fund account, or into the  
13 hands of the offeree not later than three business days following  
14 acceptance of the offer in violation of Section 2832(d), Title  
15 10, California Code of Regulations (hereinafter the  
16 "Regulations").

17 IX

18 Within the three-year period immediately preceding the  
19 filing of this Accusation in course of the activities described  
20 in Paragraph V, Respondents employed real estate salespersons,  
21 including but not limited to Frank Alam, Alonso Farias, Elva  
22 Garcia, Francisco O. Juarez, Robin Pearce-Juarez, Mai T. Pham,  
23 Irv Rosenbluth, Yolanda Segura, and Walter Yonan to engage in  
24 activities requiring a real estate salesperson license without  
25 first entering into the broker-salesperson relationship  
26  
27

1 agreement with such salespersons as required by Section 2726 of  
2 the Regulations.

3 X

4 Within the three-year period immediately preceding the  
5 filing of this Accusation in course of the activities described  
6 in Paragraph V, Respondents failed to have written agreements in  
7 place covering the material aspects of the relationship between  
8 Respondents and salespersons Tamara Alabastro, Lorna Q. Bennett,  
9 Patricia J. Figueroa, Lanh S. Hoyle, Ellen M. Pearce, and Gregory  
10 S. Simms, including but not limited to supervision of such  
11 salespersons' licensed activities, and duties of the parties as  
12 required by Section 2726 of the Regulations..

13 XI

14 Within the three-year period immediately preceding the  
15 filing of this Accusation in course of the activities described  
16 in Paragraph V, Respondents failed to retain in Respondent's  
17 possession the license certificate of Respondents' real estate  
18 salespersons, including but not limited to, Tamara Alabastro,  
19 Lorna Q. Bennett, Alonso Farias, Patricia J. Figueroa, Ellen M.  
20 Pearce, Robin Pearce-Juarez, Irv Rosenbluth, Yolanda Segura,  
21 Gregory S. Simms, and Walter Yonan as required by Section 10160  
22 of the Code and Section 2753 of the Regulations.

23 XII

24 The facts alleged above are grounds for the suspension  
25 or revocation of the licenses and license rights of Respondents  
26 under the following provisions of the Code:  
27

1 (a) As to Paragraph VI under Section 10240 of the Code  
2 in conjunction with Section 10177(d) of the Code;

3 (b) As to Paragraphs VII and VIII, under Section  
4 2832(d) of the Regulations in conjunction with Section 10177(f)  
5 of the Code;

6 (c) As to Paragraphs IX and X, under Section 2726 of  
7 the Regulations in conjunction with Section 10177(f) of the  
8 Code; and

9 (d) As to Paragraph XI, under Section 10160 of the  
10 Code and Section 2753 of the Regulations in conjunction with  
11 Section 10177(f) of the Code.

12 SECOND CAUSE OF ACTION

13 XIII

14 WILLIAMS failed to exercise reasonable supervision over  
15 the acts of PACIFIC in such a manner as to allow the acts and  
16 events described above to occur.

17 XIX

18 The acts and/or omissions of WILLIAMS described in  
19 Paragraph XIII, constitute failure on the part of WILLIAMS, as  
20 designated broker-officer for PACIFIC, to exercise reasonable  
21 supervision and control over the licensed activities of PACIFIC  
22 required by Section 10159.2 of the Code.

23 XV

24 The facts alleged in Paragraphs XIII and XIV, are  
25 grounds from the suspension or revocation of the licenses and  
26 license rights of Respondent WILLIAMS under Sections 10177(g)  
27

1 and/or 10177(h) of the Code, and Section 10177(d) of the Code in  
2 conjunction with Section 10159.2 of the Code.

3 PRIOR PROCEEDINGS


4 XVI

5 Effective August 27, 1986, in Case No. H-5600 SF before  
6 the Department of Real Estate, the Real Estate Commissioner  
7 revoked the real estate broker license of Respondent WILLIAMS,  
8 granting the right to a restricted real estate broker's license.

9 XVII

10 Effective June 15, 1988, in Case No. H-5872 SF before  
11 the Department of Real Estate, the Real Estate Commissioner  
12 disciplined the real estate broker license of Respondent  
13 WILLIAMS, for violation of Sections 10177(k). The period of  
14 Respondent's restricted broker's license was extended to three  
15 years.

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

23   
24 E. J. HABERER II  
25 Deputy Real Estate Commissioner

26 Dated at Oakland, California,  
27 this 30<sup>th</sup> day of April, 2008