

1 Department of Real Estate
2 P. O. Box 187007
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FILED

FEB 25 2010

DEPARTMENT OF REAL ESTATE



BEFORE THE DEPARTMENT OF REAL ESTATE
STATE OF CALIFORNIA

In the Matter of the Accusation of

FIRST FINANCING GROUP, INC., and
NASIRA MOJADDEDI,

Respondents.

No. H-10611 SF

OAH No. 2009050138

ORDER DENYING RECONSIDERATION

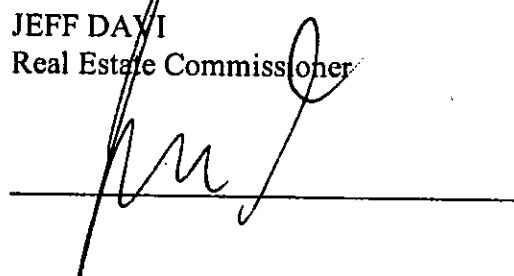
On January 21, 2010, a Decision was rendered in the above-entitled matter. The Decision is to become effective February 25, 2010.

On February 2, 2010, Respondent petitioned for reconsideration of the Decision of January 21, 2010.

I have given due consideration to the petition of Respondent. I find no good cause to reconsider the Decision of January 21, 2010, and reconsideration is hereby denied.

IT IS HEREBY ORDERED 2-24-2010


JEFF DAYI
Real Estate Commissioner



FILED

FEB 11 2010

DEPARTMENT OF REAL ESTATE



BEFORE THE DEPARTMENT OF REAL ESTATE

STATE OF CALIFORNIA

In the Matter of the Accusation of

FIRST FINANCIAL GROUP, INC.,
and NASIRA MOJADDEDI,

Respondents.

No. H-10611 SF

OAH No. 2009080714

ORDER STAYING EFFECTIVE DATE

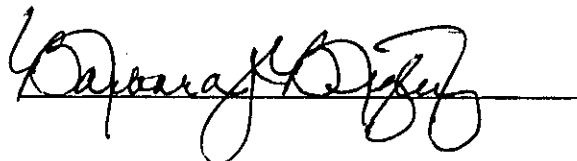
On January 21, 2010, a Decision was rendered in the above-entitled matter to become effective February 15, 2010.

IT IS HEREBY ORDERED that the effective date of the Decision of the Real Estate Commissioner of January 21, 2010, is stayed for a period of ten (10) days for the purpose of considering the Petition for Reconsideration as to Respondent NASIRA MOJADDEDI only.

The Decision of the Real Estate Commissioner of January 21, 2010, shall become effective at 12 o'clock noon on February 25, 2010.

DATED: 2/10/10

JEFF DAVI
Real Estate Commissioner



FILED

JAN 21 2010

DEPARTMENT OF REAL ESTATE

[Signature]

BEFORE THE
DEPARTMENT OF REAL ESTATE
STATE OF CALIFORNIA

In the Matter of the Accusation of)	
)	NO. H-10611 SF
FIRST FINANCING GROUP, INC.,)	
AND NASIRA MOJADDEDI,)	OAH NO. 2009080714
)	
Respondents.)	

DECISION

The Proposed Decision dated December 10, 2009, of the Administrative Law Judge of the Office of Administrative Hearings is hereby adopted as the Decision of the Real Estate Commissioner in the above-entitled matter.

This Decision shall become effective at 12 o'clock noon on

FEB 15 2010

IT IS SO ORDERED 1-21-2010

JEFF DAVI
Real Estate Commissioner

[Signature]

BY: Barbara J. Bigby
Chief Deputy Commissioner

BEFORE THE
DEPARTMENT OF REAL ESTATE
STATE OF CALIFORNIA

In the Matter of the Accusation
Against:

FIRST FINANCING GROUP, INC.,
AND NASIRA MOJADDEDI,

Respondents.

Case No. H-10611 SF

OAH No. 2009080714

PROPOSED DECISION

Administrative Law Judge Diane Schneider, State of California, Office of Administrative Hearings, heard this matter in Oakland, California, on November 12, 2009.

Complainant Charles W. Koenig, Deputy Real Estate Commissioner, was represented by Truly Sughrue, Counsel, Department of Real Estate.

Respondent Nasira Mojaddedi represented herself and First Financing Group, Inc.

The matter was submitted on November 12, 2009.

FACTUAL FINDINGS

1. Respondents are presently licensed and/or have licensing rights, under the Real Estate Law (Part 1 of Division 4 of the Business and Professions Code). At all times relevant to this proceeding, respondent First Financing Group, Inc. (FFG), was and is licensed by the Department of Real Estate (Department) as a real estate broker corporation.
2. All times relevant to this proceeding, respondent Nasira Mojaddedi was licensed by the Department as a broker. Respondent's broker license expired in March 2009.
3. On March 21, 2006, respondent FFG was licensed as a real estate broker corporation, and respondent Mojaddedi was licensed as the designated officer-broker of FFG. These licenses will expire in March 2010. As FFG's designated officer-broker Mojaddedi was responsible, pursuant to Business and Professions Code section 10159.2, for the supervision of the activities of the officers, agents, real estate licensees and employees of FFG for which a license is required.¹

¹ All statutory references are to the Business and Professions Code, unless otherwise indicated.

4. The acts or omissions of FFG, set forth below, refer to the acts or omissions of the officers, directors, employees, agents and real estate licensees employed by FFG in furtherance of the business FFG, while acting within the scope of their corporate authority and employment.

5. At no times mentioned herein was Shabnam Nawabi licensed by the Department either as a real estate broker or a real estate salesperson.

6. At all times relevant to this proceeding, respondents were engaged in the real estate resale brokerage business within the meaning of section 10131, subdivision (a), wherein, on behalf of others, and for compensation or in expectation of compensation, respondents sold and offered to sell, bought and offered to buy, solicited prospective sellers and purchasers of, solicited and obtained listings of, and negotiated the purchase and resale of real property.

7. At all times relevant to this proceeding, respondents were engaged in the mortgage loan brokerage business within the meaning of section 10131, subdivision (d), wherein respondents solicited lenders and borrowers for loans secured directly or collaterally by liens on real property or a business opportunity, and wherein such loans were arranged, negotiated, processed and consummated by respondents on behalf of others for compensation or in expectation of compensation.

First Cause of Action

8. For a three-year period beginning in February 2006, Mojaddedi employed and compensated Shabnam Nawabi, an unlicensed individual, to conduct real estate resale and mortgage loan brokerage activities as described in Factual Findings 6 and 7. Nawabi's unlicensed activities included acting as a real estate salesperson and mortgage loan agent for Albert and Angela McKenzie in connection with their purchase of real property located at 424 Dohrmann Lane, Pinole, California.

9. Albert McKenzie testified at the hearing, with credibility and candor, regarding the facts and circumstances surrounding the purchase of his home on Dohrmann Lane. In October 2005, McKenzie and his wife, Angela, were referred to Nawabi by friends at their church. Nawabi represented herself as a real estate salesperson and showed McKenzie and his wife several homes that were for sale. Nawabi gained access to the homes through a lockbox.

10. Nawabi showed McKenzie and his wife the Dohrmann Lane property. McKenzie and his wife liked the house and decided to make an offer to purchase it. Nawabi assisted them with negotiating the purchase of the Dohrmann Lane property and with obtaining a home loan. Nawabi helped McKenzie complete the residential purchase agreement, which he executed on January 6, 2006. McKenzie gave Nawabi a check as a deposit towards the purchase of the Dohrmann Lane property. McKenzie was the only buyer

listed on the purchase agreement. Mojaddedi's name and signature is on the residential purchase agreement, but Nawabi's is not. Respondent did not meet Mojaddedi until May 2006, about three months after escrow closed on the Dohrmann Lane property.

11. Mojaddedi testified that she employed Nawabi as a branch manager and loan processor. She paid Nawabi on a commission basis, based upon the number of loans that Nawabi closed per month. Nawabi was paid \$500 per transaction. Mojaddedi denied that she employed Nawabi to conduct real estate resale and mortgage loan brokerage activities. While Mojaddedi maintained that she -- and not Nawabi -- was McKenzie's real estate agent, she acknowledged that she had not met McKenzie until after escrow closed on the Dohrmann Lane property. Nawabi no longer works for Mojaddedi.

Second Cause of Action

12. Nawabi acted as McKenzie's loan agent. In connection with obtaining a loan for the Dohrmann Lane property, McKenzie informed Nawabi that he was a bus driver for AC Transit and provided Nawabi with copies of his "W-2" forms and his pay stubs.² Nawabi and Mojaddedi falsely represented on McKenzie's residential loan application that he was self-employed for four years at McKenzie Computer, and that he earned \$7,500 per month. The residential loan application is signed, purportedly by McKenzie, but McKenzie neither reviewed nor signed this application before it was submitted to the lender.³ McKenzie's residential loan application bears Mojaddedi's name and signature, dated February 1, 2006.

13. Nawabi advised McKenzie to include an additional investor in the purchase of his home in order to ensure that he obtained a home loan. McKenzie believed that Nawabi was working on his behalf, so he followed her advice. A loan application was submitted on behalf of an individual named Armondo Pastora in connection with the purchase of the Dohrmann Lane property. Pastora's residential loan application bears Mojaddedi's name and signature, dated February 1, 2006. Mojaddedi represented on this application, contrary to fact, that the property would be Pastora's primary residence. On January 30, 2006, an addendum was submitted to the residential purchase agreement for the property at Dohrmann Lane. The addendum added Pastora's name as a co-buyer. Although the addendum is purportedly signed by McKenzie, he never signed it, and he never met Pastora.⁴ Nawabi told McKenzie that Pastora's name would be removed from the deed after escrow closed. McKenzie and Pastora obtained loans in the amount of \$413,000 and \$103,400 from New Century Mortgage, to be secured by an encumbrance on the Dohrmann Lane property.

² Mrs. McKenzie did not apply for a home loan for personal reasons.

³ Although not alleged as grounds for discipline in the Accusation, it bears mentioning that McKenzie's signature was forged on a variety of other documents pertaining to his purchase of the Dohrmann Lane property.

⁴ McKenzie doubts that Pastora even exists, based upon his investigation.

14. In February 2006, escrow closed on the Dohrmann Lane property. Shortly thereafter, McKenzie tried to contact Nawabi in order to have Pastora's name taken off of the deed. Nawabi did not respond to McKenzie's requests. McKenzie saw Mojaddedi's name on some of the paperwork, so he contacted her. In May 2006, McKenzie met with Mojaddedi. Mojaddedi said that she would take care of having Pastora's name removed from the deed to the Dohrmann Lane property. Pastora's name was ultimately removed from the deed, but his name still remains on the loan.

15. Mojaddedi testified that Nawabi took information pertaining to McKenzie's loan application over the telephone. Mojaddedi later testified that she was not aware that Nawabi personally took the loan application information from McKenzie. Respondent denied that the signature under her name on McKenzie's loan application was hers. She also denied any personal knowledge as to who provided the information listed on McKenzie's loan application.

16. Mojaddedi denied knowing Pastora, except to say that he was a co-buyer of the Dohrmann Lane property. Mojaddedi stated that after she met with McKenzie, she spoke with Nawabi, who said that she "would locate Pastora and take care of it." Mojaddedi further stated that she did not know who removed Pastora's name from the deed.

17. Mojaddedi's conduct, set forth in Factual Findings 12 through 14, constitutes fraud and dishonest dealing.

Third Cause of Action

18. Ailian Liang is an auditor for the Department. She audited the records of FFG for the period from March 2006 to March 2008. Liang conducted her audit to determine if FFG conducted its real estate activities in accordance with real estate laws and regulations. Liang's examination of documents related to FFG's mortgage loan brokerage and real property resale activities. The audit was conducted at respondent's home office and at the Department's district office in Oakland. Liang's testimony at the hearing regarding the results of her audit established FFG's violation of numerous statutory and regulatory violations, as set forth in Factual Findings 18, 19, 20 and 21.

19. In connection with its mortgage loan brokerage activities, FFG failed to properly maintain mortgage loan disclosure statements (MLDS), in violation of sections 10240, 10241 and 10236.4. In one instance, the MLDS was in the file, but it was not signed by the borrower. Additionally, Mojaddedi's license number was missing from the MLDS. With respect to another loan made in 2006, a copy of the MLDS was not retained in the file.⁵

⁵ Section 10240, subdivision (a), also requires the broker to deliver a copy of the MDLS to the borrower at the time of its execution. It was not established by clear and convincing evidence that respondent FFG violated this requirement.

20. FFG failed to maintain a written control record of all trust funds received and disbursed, and which contains all information required by California Code of Regulations, title, 10, section 2831.

21. FFG failed to retain the real estate salesperson license certificate for salesperson Masood Aziz and to make the same available for inspection by the commissioner or his designee, as required by section 10160.

Fourth Cause of Action

22. Based upon the matters set forth in the First, Second and Third Causes of Action, Mojaddedi failed to exercise reasonable supervision over the acts of FFG.

23. Based upon the matters set forth in the First, Second and Third Causes of Action, Mojaddedi, as designated broker-officer of FFG, failed to exercise reasonable supervision and control over the licensed activities of FFG, as required by section 10159.2.

Rehabilitation

24. Respondent did not present any rehabilitation evidence. Respondent maintained that she "does an honest business." She denied any misconduct, except for what she described as "minor technical problems." Her testimony lacked credibility and candor.

LEGAL CONCLUSIONS

First Cause of Action

1. Pursuant to section 10130, an individual may not engage in the business of a real estate salesperson without first obtaining a real estate license from the Department. Section 10137 makes it "unlawful for any licensed real estate broker to employ or compensate, directly or indirectly, an individual for performing the duties of a real estate salesperson if that individual is not licensed under the broker employing or compensating him; . . ." Based upon the matters set forth in Factual Findings 1 through 11, cause for discipline exists against respondent Mojaddedi under these sections, as they interact with section 10177, subdivision (d).

Second Cause of Action

2. Section 10176, subdivisions (a) and (i), provide for discipline of a real estate licensee who, in the course of acting as a real estate licensee, makes a substantial misrepresentation or engages in fraud or dishonest dealing, respectively. Section 10177, subdivisions (g) and (j), provide for discipline of a real estate licensee who, in the course of acting as a real estate licensee, engages in fraud or dishonest dealing, respectively. Based upon the matters set forth in Factual Findings 12 through 17, cause for discipline exists against respondent Mojaddedi under these sections.

Third Cause of Action

3. Section 10240, subdivision (a), provides that a broker who negotiates a mortgage loan on behalf of a borrower within the meaning of section 10131, must provide the borrower with a written disclosure statement. Such statements must be signed by the borrower and the broker, or by a real estate licensee acting for the broker in negotiating the loan. That section further provides that copies of such statements must be retained by the broker for a period of three years. FFG failed to comply with these requirements, as set forth in Factual Findings 18 and 19. Accordingly, cause for discipline against FFG exists under this section, as it interacts with section 10177, subdivision (d).⁶ While section 10240, subdivision (a), also requires the broker to deliver a copy of the MDLS to the borrower at the time of its execution, it was not established that respondent FFG violated this requirement.

4. Section 10236.4, subdivision (b), provides that the disclosures required by section 10240 shall contain the licensee's license number. Based upon the matters set forth in Factual Finding 19, cause for discipline exists against respondent FFG under this section.

5. California Code of Regulations, title 10, section 2831, requires every broker to maintain a written control record of all trust funds received and disbursed. Trust fund records must contain the information set forth in this regulation. Based upon the matters set forth in Factual Finding 20, cause for discipline exists against respondent FFG under this section.

6. Section 10160 and California Code of Regulations, title 10, section 2753 provide that real estate brokers shall retain the real estate salesperson license of those under his or her employ, and make the same available for inspection by the commissioner or his designated representative. Based upon the matters set forth in Factual Finding 21, cause for discipline against respondent FFG exists under this section.

Fourth Cause of Action

7. Pursuant to section 10177, subdivisions (g) and (h), a real estate licensee may be disciplined for negligence; and, in cases involving a broker licensee or officer of a corporate broker licensee, for failing to exercise reasonable supervision over the activities of real estate salespersons or the activities of the corporation. Additionally, under section 10159.2, the designated officer is responsible for the supervision of the activities conducted on behalf of the corporation by its officers and employees. Based upon the matters set forth in Factual Findings 8 through 23, Mojaddedi failed to exercise reasonable supervision and control over the mortgage brokering activities of FFG and its employees, and she failed to take reasonable steps to ensure FFG's compliance with real estate laws. Accordingly, cause for discipline exists against respondent Mojaddedi under these sections, as they interact with section 10177, subdivision (d).

Appropriate Discipline

8. The Commissioner is charged with the responsibility of monitoring the activities of its licensees to ensure compliance with applicable rules and regulations. In order to ensure the public's protection, the Commissioner must be satisfied that its licensees are willing and able to conduct their business within the bounds of the law, and that they exercise reasonable diligence and accuracy in doing so. The Commissioner cannot be assured that the public is protected when, as here, a licensee engages in a pattern of violating the rules and regulations promulgated by the Department.

The evidence adduced at the hearing demonstrated that Mojaddedi allowed an unlicensed individual, Nawabi, to act as a real estate salesperson. Further, numerous documents in the McKenzie transaction bore Mojaddedi's signature, despite the fact that Mojaddedi did not even meet McKenzie until months after escrow had closed. Moreover, someone at FFG falsified information on McKenzie's loan application, and forged McKenzie's signature on his application and on the addendum to the residential purchase agreement. It is particularly troubling that, against this background, Mojaddedi denies any wrongdoing, with the exception of what she describes as minor technical violations.

Under these circumstances, respondent did not meet her burden to show that she is rehabilitated from her misconduct, and that she can be trusted to discharge her duties as a licensee in a manner consistent with public safety. Accordingly, it is determined that revocation of Mojaddedi's real estate broker license and that revocation of FFG's licensing rights under the real estate law is the appropriate discipline.

ORDERS

1. All licenses and licensing rights of respondent Nasira Mojaddedi under the Real Estate Law are revoked by reason of Legal Conclusions 1, 2, 7, and 8, jointly and individually.

2. All licenses and licensing rights of respondent First Financing Group, Inc., under the Real Estate law are revoked by reason of Legal Conclusions 3 through 6, jointly and individually.

DATED: 12/10/09



DIANE SCHNEIDER
Administrative Law Judge
Office of Administrative Hearings

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3 Department of Real Estate
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6 Telephone: (916) 227-0781

FILED

FEB 19 2009

DEPARTMENT OF REAL ESTATE

By K. Mar

9 BEFORE THE DEPARTMENT OF REAL ESTATE

10 STATE OF CALIFORNIA

11 * * *

12 In the Matter of the Accusation of:)

13)
14 FIRST FINANCING GROUP, INC.)
15 and NASIRA MOJADDEDI,)

16 Respondents.)

No. H-10611 SF

ACCUSATION

17 The Complainant, CHARLES W. KOENIG, a Deputy Real Estate Commissioner
18 of the State of California, for cause of Accusation against FIRST FINANCING GROUP, INC.
19 and NASIRA MOJADDEDI, (hereinafter, collectively "Respondents"), is informed and alleges
20 as follows:

21 PRELIMINARY ALLEGATIONS

22 1

23 The Complainant, CHARLES W. KOENIG, a Deputy Real Estate Commissioner
24 of the State of California, makes this Accusation in his official capacity.

25 2

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

3

Beginning on or about March 21, 2006 and continuing thereafter, FIRST FINANCING GROUP, INC. (hereinafter "FFG") was and is licensed by the State of California Department of Real Estate (hereinafter "the Department") as a real estate broker corporation.

4

At all times mentioned, NASIRA MOJADDEDI (hereinafter "MOJADDEDI"), was and is licensed by the Department individually as a broker. Beginning on or about March 21, 2006 and continuing thereafter, MOJADDEDI was and is licensed as the designated officer-broker of FFG. As said designated officer-broker, MOJADDEDI was and/or 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 FFG for which a real estate license was and/or is required.

5

At no times mentioned was Shabnam Nawabi (hereinafter "Nawabi") licensed by the Department either as a real estate broker or as a real estate salesperson.

6

Whenever reference is made in an allegation in this Accusation to an act or omission of FFG, such allegation shall be deemed to mean that the officers, directors, employees, agents and/or real estate licensees employed by or associated with FFG committed such act or omission while engaged in the furtherance of the business or operations of such corporate Respondent, and while acting within the course and scope of their authority and employment.

7

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

///

1 (a) Section 10131(a) of the Code, including the operation and conduct of a
2 real estate resale brokerage with the public wherein, on behalf of others, for compensation or in
3 expectation of compensation, Respondents sold and offered to sell, bought and offered to buy,
4 solicited prospective sellers and purchasers of, solicited and obtained listings of, and negotiated
5 the purchase and resale of real property; and

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

11 FIRST CAUSE OF ACTION

12 8

13 Each and every allegation in Paragraphs 1 through 7, inclusive, above, is
14 incorporated by this reference as if fully set forth herein.

15 9

16 Beginning on or about January 2006 and within the last three years,
17 MOJADDEDI employed and compensated Nawabi, an unlicensed individual, to perform the
18 acts and conduct the activities described in Paragraph 7, above, including, but not limited to, the
19 activities described in Paragraph 10, below.

20 10

21 In course of the activities and employment described above, without first being
22 licensed by the Department either as a real estate salesperson or as a real estate broker, Nawabi,
23 acting for and on behalf of another or others, for or in expectation of compensation, solicited
24 loans secured directly or collaterally by liens on real property and/or sold and offered to sell,
25 bought and offered to buy, solicited prospective sellers and purchasers of, solicited and obtained
26 listings of, and negotiated the purchase and resale of real property, including but not limited to
27 the real property located at: 424 Dohrmann Lane, Pinole, California.

11

In acting as described above, MOJADDEDI violated and/or willfully failed to comply with Sections 10130 and 10137 of the Code.

12

The facts alleged in Paragraphs 8 through 11 are grounds for the suspension or revocation of the licenses and license rights of MOJADDEDI under Section 10177(d) in conjunction with Sections 10130 and 10137 of the Code.

SECOND CAUSE OF ACTION

13

Each and every allegation in Paragraphs 1 through 12, inclusive, above, is incorporated by this reference as if fully set forth herein.

14

On or about February 23, 2006, MOJADDEDI and Nawabi, acting as the agent of Albert McKenzie and Armando Pastora solicited and obtained loans in the amount of \$413,600 and \$103,400 from New Century Mortgage to be secured by an encumbrance on the property located at 424 Dohrmann Lane, Pinole, California by representing, contrary to fact, that Albert McKenzie was self employed for the last four years at McKenzie Computer Tech, earning \$7,500 per month. In truth, Albert McKenzie was employed as a bus driver for the past 15 years earning substantially less than \$7,500 per month. In addition, MOJADDEDI represented, contrary to fact, that the property would be the primary residence of Armando Pastora.

15

The acts and omissions of Respondent MOJADDEDI described in Paragraphs 12 through 14 constitutes fraud and/or dishonest dealing, and constitutes cause to suspend or revoke all licenses and license rights of MOJADDEDI pursuant to the provisions of Sections 10176(a), 10176(i), 10177(g), and/or 10177(j) of the Code.

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The facts alleged above are grounds for the suspension or revocation of the licenses and license rights of FFG under the following sections of the Code and the Regulations:

- (a) As to Paragraphs 17 under Section 10240 of the Code in conjunction with Section 10177(d) of the Code;
- (b) As to Paragraph 18 under Section 10236.4 of the Code in conjunction with Section 10177(d) of the Code;
- (c) As to Paragraph 19 under Section 2831 of the Regulations in conjunction with Section 10177(d) of the Code; and
- (d) As to Paragraph 20 under Section 10160 of the Code and Section 2753 of the Regulations in conjunction with Section 10177(d) of the Code.

FOURTH CAUSE OF ACTION

Each and every allegation in Paragraphs 1 through 22, inclusive, above, is incorporated by this reference as if fully set forth herein.


MOJADDEDI failed to exercise reasonable supervision over the acts of FFG in such a manner as to allow the acts and events described in the First through Third Causes of Action to occur.

The acts and/or omissions of MOJADDEDI described in Paragraph 23 constitute failure on the part of MOJADDEDI, as designated broker-officer for FFG, to exercise reasonable supervision and control over the licensed activities of FFG required by Section 10159.2 of the Code.

The facts alleged in Paragraphs 23 and 24, are grounds from the suspension or revocation of the licenses and license rights of Respondent MOJADDEDI under Sections

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

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

8
9 
10 CHARLES W. KOENIG
11 Deputy Real Estate Commissioner

12 Dated at Sacramento, California,
13 this 18th day of February 2009
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