e <b>9</b> .			
1	MARY F. CLARKE, Counsel (SBN 186744)		
2	Bureau of Real Estate 1651 Exposition Blvd.		
3	P. O. Box 137007 Sacramento, CA 95813-7007		
4			
5	Telephone: (916) 263-8670	FILED	
6	-or- (916) 263-7303 (Direct)	OCT 0 1 2015	
7	-or- (916) 263-3767 (Fax)	BUREAU OF REAL ESTATE	
8		By B. Nicholas	
9			
10			
11	BEFORE THE BUREAU OF REAL ESTATE		
12	STATE OF CALIFORNIA		
13			
14	In the Matter of the Accusation of	) NO. H-11890 SF	
15	JINNIE J. CHAO,	) ) ACCUSATION	
16	Respondent.		
17		)	
18	The Complainant, ROBIN TANNER, a Supervising Special Investigator of the		
19	State of California, makes this Accusation in her official capacity against JINNIE J. CHAO		
20	(herein "Respondent"), is informed and alleges as follows:		
21	1		
22	Respondent is licensed and/or has license rights under the Real Estate Law,		
23	Part 1 of Division 4 of the California Business and Professions Code (herein "the Code").		
24	2		
25	At all times herein mentioned, Respondent was licensed by the Bureau of Real		
26	Estate (herein "the Bureau") as a real estate broker and was employed as an associate broker		
27	with A.K.T. American Capital, Inc., dba American Capital Corporation (herein "ACC").		
	- 1 -		
	1		

 $\sqrt{}$ 

2       At all times herein mentioned, Respondent engaged in the business of, acted in         3       the capacity of, advertised, or assumed to act as a real estate broker for compensation or in         4       expectation of compensation within the State of California within the meaning of Section         5       10131(a) of the Code, whereby Respondent sold or offered to sell, bought or offered to buy,         6       solicited prospective sellers or purchasers of, solicited or obtained listings of, or negotiated the         7       purchase, sale or exchange of real property or a business opportunity.         8       4         9       On about March 18, 2014, Respondent, in connection with the activities         10       described in Paragraph 3, above, acting on behalf of purchasers David W. and Tong L.         11       (herein "David and Tong") for the purchase of a property located on 66 <sup>th</sup> Street in Oakland,         12       California (herein "the Property"), submitted to Henry Chan, the listing agent for the Property,         13       a Pre-Approval Letter (herein "the Letter"), along with David and Tong's purchase offer; the         14       Letter was ostensibly signed by Margaret Katz (herein "Katz"), ACC's Branch Manager, when         16       violation of Section 10176(a) and (i) of the Code.         17       5         18       The facts alleged in Paragraph 4, above, are grounds for the suspension or         19 <th>1</th> <th>3</th> <th></th>	1	3		
4expectation of compensation within the State of California within the meaning of Section510131(a) of the Code, whereby Respondent sold or offered to sell, bought or offered to buy,6solicited prospective sellers or purchasers of, solicited or obtained listings of, or negotiated the7purchase, sale or exchange of real property or a business opportunity.849On about March 18, 2014, Respondent, in connection with the activities10described in Paragraph 3, above, acting on behalf of purchasers David W. and Tong L.11(herein "David and Tong") for the purchase of a property located on 66 <sup>th</sup> Street in Oakland,12California (herein "the Property"), submitted to Henry Chan, the listing agent for the Property,13a Pre-Approval Letter (herein "the Letter"), along with David and Tong's purchase offer, the14Letter was ostensibly signed by Margaret Katz (herein "Katz"), ACC's Branch Manager, when15in fact, Respondent signed Katz' name without Katz' knowledge, permission or authorization, in16violation of Section 10176(a) and (i) of the Code.17518The facts alleged in Paragraph 4, above, are grounds for the suspension or19revocation of the license and license rights of Respondent under Section 10176(a) and (i) of the20Code.211000000000000000000000000000000000000	2	At all times herein mentioned, Respondent engaged in the business of, acted in		
51013 1(a) of the Code, whereby Respondent sold or offered to sell, bought or offered to buy,6solicited prospective sellers or purchasers of, solicited or obtained listings of, or negotiated the7purchase, sale or exchange of real property or a business opportunity.849On about March 18, 2014, Respondent, in connection with the activities10described in Paragraph 3, above, acting on behalf of purchasers David W. and Tong L.11(herein "David and Tong") for the purchase of a property located on 66 <sup>th</sup> Street in Oakland,12California (herein "the Property"), submitted to Henry Chan, the listing agent for the Property,13a Pre-Approval Letter (herein "the Letter"), along with David and Tong's purchase offer; the14Letter was ostensibly signed by Margaret Katz (herein "Katz"), ACC's Branch Manager, when15in fact, Respondent signed Katz' name without Katz' knowledge, permission or authorization, in16violation of Section 10176(a) and (i) of the Code.17518The facts alleged in Paragraph 4, above, are grounds for the suspension or19revocation of the license and license rights of Respondent under Section 10176(a) and (i) of the20Code.21COST RECOVERY22633Investigation and Enforcement Costs34Section 10106 of the Code provides, in pertinent part, that in any order issued in35resolution of a disciplinary proceeding before the Bureau, the Commissioner may request the34Administrative Law Judge to direct a licensee found to have committed a violation of t	3			
6solicited prospective sellers or purchasers of, solicited or obtained listings of, or negotiated the7purchase, sale or exchange of real property or a business opportunity.849On about March 18, 2014, Respondent, in connection with the activities10described in Paragraph 3, above, acting on behalf of purchasers David W. and Tong L.11(herein "David and Tong") for the purchase of a property located on 66 <sup>th</sup> Street in Oakland,12California (herein "the Property"), submitted to Henry Chan, the listing agent for the Property,13a Pre-Approval Letter (herein "the Letter"), along with David and Tong's purchase offer; the14Letter was ostensibly signed by Margaret Katz (herein "Katz"), ACC's Branch Manager, when15in fact, Respondent signed Katz' name without Katz' knowledge, permission or authorization, in16violation of Section 10176(a) and (i) of the Code.17518The facts alleged in Paragraph 4, above, are grounds for the suspension or19revocation of the license and license rights of Respondent under Section 10176(a) and (i) of the20621COST RECOVERY22633Investigation and Enforcement Costs24Section 10106 of the Code provides, in pertinent part, that in any order issued in25resolution of a disciplinary proceeding before the Bureau, the Commissioner may request the26Administrative Law Judge to direct a licensee found to have committed a violation of this part to	4			
7       purchase, sale or exchange of real property or a business opportunity.         8       4         9       On about March 18, 2014, Respondent, in connection with the activities         10       described in Paragraph 3, above, acting on behalf of purchasers David W. and Tong L.         11       (herein "David and Tong") for the purchase of a property located on 66 <sup>th</sup> Street in Oakland,         12       California (herein "the Property"), submitted to Henry Chan, the listing agent for the Property,         13       a Pre-Approval Letter (herein "the Letter"), along with David and Tong's purchase offer; the         14       Letter was ostensibly signed by Margaret Katz (herein "Katz"), ACC's Branch Manager, when         15       in fact, Respondent signed Katz' name without Katz' knowledge, permission or authorization, in         16       violation of Section 10176(a) and (i) of the Code.         17       5         18       The facts alleged in Paragraph 4, above, are grounds for the suspension or         19       revocation of the license and license rights of Respondent under Section 10176(a) and (i) of the         20       6         21       COST RECOVERY         22       6         23       Investigation and Enforcement Costs         24       Section 10106 of the Code provides, in pertinent part, that in any order issued in         25       reso	5	10131(a) of the Code, whereby Respondent sold or offered to sell, bought or offered to buy,		
849On about March 18, 2014, Respondent, in connection with the activities10described in Paragraph 3, above, acting on behalf of purchasers David W. and Tong L.11(herein "David and Tong") for the purchase of a property located on 66 <sup>th</sup> Street in Oakland,12California (herein "the Property"), submitted to Henry Chan, the listing agent for the Property,13a Pre-Approval Letter (herein "the Letter"), along with David and Tong's purchase offer; the14Letter was ostensibly signed by Margaret Katz (herein "Katz"), ACC's Branch Manager, when15in fact, Respondent signed Katz' name without Katz' knowledge, permission or authorization, in16violation of Section 10176(a) and (i) of the Code.17518The facts alleged in Paragraph 4, above, are grounds for the suspension or19revocation of the license and license rights of Respondent under Section 10176(a) and (i) of the20Code.21623Investigation and Enforcement Costs24Section 10106 of the Code provides, in pertinent part, that in any order issued in25resolution of a disciplinary proceeding before the Bureau, the Commissioner may request the26Administrative Law Judge to direct a licensee found to have committed a violation of this part to	6	solicited prospective sellers or purchasers of, solicited or obtained listings of, or negotiated the		
9On about March 18, 2014, Respondent, in connection with the activities10described in Paragraph 3, above, acting on behalf of purchasers David W. and Tong L.11(herein "David and Tong") for the purchase of a property located on 66 <sup>th</sup> Street in Oakland,12California (herein "the Property"), submitted to Henry Chan, the listing agent for the Property,13a Pre-Approval Letter (herein "the Letter"), along with David and Tong's purchase offer; the14Letter was ostensibly signed by Margaret Katz (herein "Katz"), ACC's Branch Manager, when15in fact, Respondent signed Katz' name without Katz' knowledge, permission or authorization, in16violation of Section 10176(a) and (i) of the Code.17518The facts alleged in Paragraph 4, above, are grounds for the suspension or19revocation of the license and license rights of Respondent under Section 10176(a) and (i) of the20Code.21623Investigation and Enforcement Costs24Section 10106 of the Code provides, in pertinent part, that in any order issued in25resolution of a disciplinary proceeding before the Bureau, the Commissioner may request the26Administrative Law Judge to direct a licensee found to have committed a violation of this part to	7	purchase, sale or exchange of real property or a business opportunity.		
10       described in Paragraph 3, above, acting on behalf of purchasers David W. and Tong L.         11       (herein "David and Tong") for the purchase of a property located on 66 <sup>th</sup> Street in Oakland,         12       California (herein "the Property"), submitted to Henry Chan, the listing agent for the Property,         13       a Pre-Approval Letter (herein "the Letter"), along with David and Tong's purchase offer; the         14       Letter was ostensibly signed by Margaret Katz (herein "Katz"), ACC's Branch Manager, when         15       in fact, Respondent signed Katz' name without Katz' knowledge, permission or authorization, in         16       violation of Section 10176(a) and (i) of the Code.         17       5         18       The facts alleged in Paragraph 4, above, are grounds for the suspension or         19       revocation of the license and license rights of Respondent under Section 10176(a) and (i) of the         20       Code.         21       COST RECOVERY         22       6         23       Investigation and Enforcement Costs         24       Section 10106 of the Code provides, in pertinent part, that in any order issued in         25       resolution of a disciplinary proceeding before the Bureau, the Commissioner may request the         26       Administrative Law Judge to direct a licensee found to have committed a violation of this part to <td>8</td> <td>4</td> <td></td>	8	4		
11(herein "David and Tong") for the purchase of a property located on 66 <sup>th</sup> Street in Oakland,12California (herein "the Property"), submitted to Henry Chan, the listing agent for the Property,13a Pre-Approval Letter (herein "the Letter"), along with David and Tong's purchase offer; the14Letter was ostensibly signed by Margaret Katz (herein "Katz"), ACC's Branch Manager, when15in fact, Respondent signed Katz' name without Katz' knowledge, permission or authorization, in16violation of Section 10176(a) and (i) of the Code.17518The facts alleged in Paragraph 4, above, are grounds for the suspension or19revocation of the license and license rights of Respondent under Section 10176(a) and (i) of the20Code.21COST RECOVERY22623Investigation and Enforcement Costs24Section 10106 of the Code provides, in pertinent part, that in any order issued in25resolution of a disciplinary proceeding before the Bureau, the Commissioner may request the26Administrative Law Judge to direct a licensee found to have committed a violation of this part to	- 9	On about March 18, 2014, Respondent, in connection with the activities		
12California (herein "the Property"), submitted to Henry Chan, the listing agent for the Property,13a Pre-Approval Letter (herein "the Letter"), along with David and Tong's purchase offer; the14Letter was ostensibly signed by Margaret Katz (herein "Katz"), ACC's Branch Manager, when15in fact, Respondent signed Katz' name without Katz' knowledge, permission or authorization, in16violation of Section 10176(a) and (i) of the Code.17518The facts alleged in Paragraph 4, above, are grounds for the suspension or19revocation of the license and license rights of Respondent under Section 10176(a) and (i) of the20Code.21COST RECOVERY22623Investigation and Enforcement Costs24Section 10106 of the Code provides, in pertinent part, that in any order issued in25resolution of a disciplinary proceeding before the Bureau, the Commissioner may request the26Administrative Law Judge to direct a licensee found to have committed a violation of this part to	10	described in Paragraph 3, above, acting on behalf of purchasers David W. and Tong L.		
13a Pre-Approval Letter (herein "the Letter"), along with David and Tong's purchase offer; the14Letter was ostensibly signed by Margaret Katz (herein "Katz"), ACC's Branch Manager, when15in fact, Respondent signed Katz' name without Katz' knowledge, permission or authorization, in16violation of Section 10176(a) and (i) of the Code.17518The facts alleged in Paragraph 4, above, are grounds for the suspension or19revocation of the license and license rights of Respondent under Section 10176(a) and (i) of the20Code.21COST RECOVERY22623Investigation and Enforcement Costs24Section 10106 of the Code provides, in pertinent part, that in any order issued in25resolution of a disciplinary proceeding before the Bureau, the Commissioner may request the26Administrative Law Judge to direct a licensee found to have committed a violation of this part to	11	(herein "David and Tong") for the purchase of a property located on 66 <sup>th</sup> Street in Oakland,		
14Letter was ostensibly signed by Margaret Katz (herein "Katz"), ACC's Branch Manager, when15in fact, Respondent signed Katz' name without Katz' knowledge, permission or authorization, in16violation of Section 10176(a) and (i) of the Code.17518The facts alleged in Paragraph 4, above, are grounds for the suspension or19revocation of the license and license rights of Respondent under Section 10176(a) and (i) of the20Code.21COST RECOVERY22623Investigation and Enforcement Costs24Section 10106 of the Code provides, in pertinent part, that in any order issued in25resolution of a disciplinary proceeding before the Bureau, the Commissioner may request the26Administrative Law Judge to direct a licensee found to have committed a violation of this part to	12	California (herein "the Property"), submitted to Henry Chan, the listing agent for the Property,		
<ul> <li>in fact, Respondent signed Katz' name without Katz' knowledge, permission or authorization, in</li> <li>violation of Section 10176(a) and (i) of the Code.</li> <li>The facts alleged in Paragraph 4, above, are grounds for the suspension or</li> <li>revocation of the license and license rights of Respondent under Section 10176(a) and (i) of the</li> <li>Code.</li> <li>Code.</li> <li><u>COST RECOVERY</u></li> <li>Investigation and Enforcement Costs</li> <li>Section 10106 of the Code provides, in pertinent part, that in any order issued in</li> <li>resolution of a disciplinary proceeding before the Bureau, the Commissioner may request the</li> <li>Administrative Law Judge to direct a licensee found to have committed a violation of this part to</li> </ul>	13	a Pre-Approval Letter (herein "the Letter"), along with David and Tong's purchase offer; the		
<ul> <li>violation of Section 10176(a) and (i) of the Code.</li> <li>5</li> <li>The facts alleged in Paragraph 4, above, are grounds for the suspension or</li> <li>revocation of the license and license rights of Respondent under Section 10176(a) and (i) of the</li> <li>Code.</li> <li>Code.</li> <li><u>COST RECOVERY</u></li> <li><u>Investigation and Enforcement Costs</u></li> <li>Section 10106 of the Code provides, in pertinent part, that in any order issued in</li> <li>resolution of a disciplinary proceeding before the Bureau, the Commissioner may request the</li> <li>Administrative Law Judge to direct a licensee found to have committed a violation of this part to</li> </ul>	14	Letter was ostensibly signed by Margaret Katz (herein "Katz"), ACC's Branch Manager, when		
17518The facts alleged in Paragraph 4, above, are grounds for the suspension or19revocation of the license and license rights of Respondent under Section 10176(a) and (i) of the20Code.21COST RECOVERY22623Investigation and Enforcement Costs24Section 10106 of the Code provides, in pertinent part, that in any order issued in25resolution of a disciplinary proceeding before the Bureau, the Commissioner may request the26Administrative Law Judge to direct a licensee found to have committed a violation of this part to	15	in fact, Respondent signed Katz' name without Katz' knowledge, permission or authorization, in		
18The facts alleged in Paragraph 4, above, are grounds for the suspension or19revocation of the license and license rights of Respondent under Section 10176(a) and (i) of the20Code.21COST RECOVERY22623Investigation and Enforcement Costs24Section 10106 of the Code provides, in pertinent part, that in any order issued in25resolution of a disciplinary proceeding before the Bureau, the Commissioner may request the26Administrative Law Judge to direct a licensee found to have committed a violation of this part to	16	violation of Section 10176(a) and (i) of the Code.		
<ul> <li>revocation of the license and license rights of Respondent under Section 10176(a) and (i) of the</li> <li>Code.</li> <li><u>COST RECOVERY</u></li> <li><u>Investigation and Enforcement Costs</u></li> <li>Section 10106 of the Code provides, in pertinent part, that in any order issued in</li> <li>resolution of a disciplinary proceeding before the Bureau, the Commissioner may request the</li> <li>Administrative Law Judge to direct a licensee found to have committed a violation of this part to</li> </ul>	17	5		
<ul> <li>Code.</li> <li>COST RECOVERY</li> <li>COST RECOVERY</li> <li>Investigation and Enforcement Costs</li> <li>Section 10106 of the Code provides, in pertinent part, that in any order issued in</li> <li>resolution of a disciplinary proceeding before the Bureau, the Commissioner may request the</li> <li>Administrative Law Judge to direct a licensee found to have committed a violation of this part to</li> </ul>	18	The facts alleged in Paragraph 4, above, are grounds for the suspension or		
<ul> <li>21 <u>COST RECOVERY</u></li> <li>22 6</li> <li>23 <u>Investigation and Enforcement Costs</u></li> <li>24 Section 10106 of the Code provides, in pertinent part, that in any order issued in</li> <li>25 resolution of a disciplinary proceeding before the Bureau, the Commissioner may request the</li> <li>26 Administrative Law Judge to direct a licensee found to have committed a violation of this part to</li> </ul>	19	revocation of the license and license rights of Respondent under Section 10176(a) and (i) of the		
22       6         23       Investigation and Enforcement Costs         24       Section 10106 of the Code provides, in pertinent part, that in any order issued in         25       resolution of a disciplinary proceeding before the Bureau, the Commissioner may request the         26       Administrative Law Judge to direct a licensee found to have committed a violation of this part to	20	Code.		
23Investigation and Enforcement Costs24Section 10106 of the Code provides, in pertinent part, that in any order issued in25resolution of a disciplinary proceeding before the Bureau, the Commissioner may request the26Administrative Law Judge to direct a licensee found to have committed a violation of this part to	21	<u>COST RECOVERY</u>		
<ul> <li>Section 10106 of the Code provides, in pertinent part, that in any order issued in</li> <li>resolution of a disciplinary proceeding before the Bureau, the Commissioner may request the</li> <li>Administrative Law Judge to direct a licensee found to have committed a violation of this part to</li> </ul>	22	6		
<ul> <li>resolution of a disciplinary proceeding before the Bureau, the Commissioner may request the</li> <li>Administrative Law Judge to direct a licensee found to have committed a violation of this part to</li> </ul>	23	Investigation and Enforcement Costs		
26 Administrative Law Judge to direct a licensee found to have committed a violation of this part to	24	Section 10106 of the Code provides, in pertinent part, that in any order issued in		
	25	resolution of a disciplinary proceeding before the Bureau, the Commissioner may request the		
27 pay a sum not to exceed the reasonable costs of the investigation and enforcement of the case.	26	Administrative Law Judge to direct a licensee found to have committed a violation of this part to		
11	27	pay a sum not to exceed the reasonable costs of the investigation and enforcement of the case.		

11

- 2 -

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 all licenses and license rights of Respondent under the Real Estate Law (Part 1 of
 Division 4 of the Business and Professions Code), for the cost of the investigation and
 enforcement as permitted by law, and for such other and further relief as may be proper under
 other applicable provisions of law.

Jon SZ

ROBIN TANNER Supervising Special Investigator

<sup>3</sup> Dated at Oakland, California,
 <sup>4</sup> this day of September, 2015.

- 3 -