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FILED

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BUREAU OF REAL ESTATE
By K. Contreras

9 BEFORE THE
10 BUREAU OF REAL ESTATE
11 STATE OF CALIFORNIA

12 * * *

13 In the Matter of the First Amended Accusation of)
14 JINNIE J. CHAO,) NO. H-11890 SF
15 Respondent.) FIRST AMENDED
16) ACCUSATION

17 The Complainant, ROBIN TANNER, a Supervising Special Investigator of the
18 State of California, makes this First Amended Accusation in her official capacity against
19 JINNIE J. CHAO (herein "Respondent"), is informed and alleges as follows:

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21 Respondent is licensed and/or has license rights under the Real Estate Law,
22 Part 1 of Division 4 of the California Business and Professions Code (herein "the Code").

23 2

24 At all times herein mentioned, Respondent was licensed by the Bureau of Real
25 Estate (herein "the Bureau") as a real estate broker, which includes a Mortgage Loan Originator
26 license endorsement, and was employed as an associate broker with A.K.T. American Capital,
27 Inc., dba American Capital Corporation (herein "ACC").

At all times herein mentioned, Respondent engaged in the business of, acted in the capacity of, advertised, or assumed to act as a real estate broker for compensation or in expectation of compensation within the State of California within the meaning of Section 10131(a) of the Code, whereby Respondent sold or offered to sell, bought or offered to buy, solicited prospective sellers or purchasers of, solicited or obtained listings of, or negotiated the purchase, sale or exchange of real property or a business opportunity.

On about March 18, 2014, Respondent, in connection with the activities described in Paragraph 3, above, acting on behalf of purchasers David W. and Tong L. (herein "David and Tong") for the purchase of a property located on 66th Street in Oakland, California (herein "the Property"), submitted to Henry Chan, the listing agent for the Property, a Pre-Approval Letter (herein "the Letter"), along with David and Tong's purchase offer; the Letter was ostensibly signed by Margaret Katz (herein "Katz"), ACC's Branch Manager, when in fact, Respondent signed Katz' name without Katz' knowledge, permission or authorization, in violation of Section 10176(a) and (i) of the Code.

The facts alleged in Paragraph 4, above, are grounds for the suspension or revocation of the license and license rights of Respondent under Section 10176(a) and (i) of the Code.

COST RECOVERY

Investigation and Enforcement Costs

Section 10106 of the Code provides, in pertinent part, that in any order issued in resolution of a disciplinary proceeding before the Bureau, the Commissioner may request the Administrative Law Judge to direct a licensee found to have committed a violation of this part to pay a sum not to exceed the reasonable costs of the investigation and enforcement of the case.

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

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11 ROBIN TANNER
12 Supervising Special Investigator

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14 Dated at Oakland, California,
15 this 16th day of November, 2015.