

By C. J. [Signature]

* * * *

ORDER GRANTING REINSTATEMENT OF LICENSE

I have considered Respondent's petition and the evidence and arguments in support thereof. Respondent has

1 demonstrated to my satisfaction that grounds do not presently
2 exist to deny the issuance of an unrestricted real estate
3 broker license to Respondent.

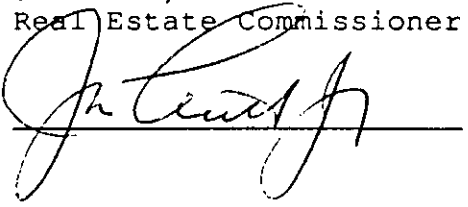
4 NOW, THEREFORE, IT IS ORDERED that Respondent's
5 petition for reinstatement is granted and that an
6 unrestricted real estate broker license be issued to
7 Respondent, ALBERT KONG KEONG CHANG, after Respondent
8 satisfies the following conditions within one (1) year from
9 the date of this Order:

10 1. Submittal of a completed application and
11 payment of the fee for a real estate broker license.

12 2. Submittal of evidence satisfactory to the Real
13 Estate Commissioner that Respondent has, since his present
14 restricted license was issued, taken and successfully
15 completed the continuing education requirements of Article
16 2.5 of Chapter 3 of the Real Estate Law for renewal of a real
17 estate license.

18 This Order shall become effective immediately.

19 DATED: 7/5/95
20

21 JIM ANTT, JR.
22 Real Estate Commissioner
23 
24

25 ALBERT KONG KEONG CHANG
26 3346 Sunnynook Drive
27 Los Angeles, California 90039

1 Department of Real Estate
2 107 South Broadway, Room 8107
3 Los Angeles, California 90012
4
5 (213) 897-3937
6
7

FILED

OCT-7 1993

DEPARTMENT OF REAL ESTATE
BY C. Bay

8 DEPARTMENT OF REAL ESTATE
9 STATE OF CALIFORNIA

10 * * * * *

11 In the Matter of the Accusation of)
12 PACIFIC SHORES MORTGAGE CO. INC.) No. H-24760 LA
13 a corporation; ALBERT KONG KEONG)
14 CHANG, individually and as)
15 designated officer of Pacific)
16 Mortgage Co. Inc; and)
AUSTIN SYLVESTER JORDAN,)
Respondents.)

17 STIPULATION AND AGREEMENT IN SETTLEMENT AND ORDER

18 It is hereby stipulated by and between PACIFIC SHORES
19 MORTGAGE CO. INC., a corporation (hereinafter "PSMC"), represented
20 by Austin Sylvester Jordan and AUSTIN SYLVESTER JORDAN (hereinafter
21 "JORDAN" and/or "Respondent"), represented by Robert L. Rosenthal
22 and the Complainant acting by and through Christopher K.D. Leong,
23 Counsel for the Department of Real Estate, as follows for the
24 purpose of settling and disposing of the Accusation filed on
25 August 7, 1991, and amended on February 20, 1992, and
26 June 26, 1992, in this matter.

27 //

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

7 2. Respondents have received, reviewed and understand
8 the Accusation the First Amendment to Accusation, Second Amendment
9 to Accusation, the Statement to Respondent, and the Discovery
10 Provisions of the APA filed by the Department of Real Estate in the
11 above-captioned proceeding.

12 3. Respondent JORDAN, individually and on behalf of
13 Respondent PSMC, filed Notices of Defense pursuant to Section 11505
14 of the Government Code for the purpose of requesting a hearing on
15 the allegations in the Accusation and Amendments. Each Respondent
16 hereby freely and voluntarily withdraws said Notices of Defense to
17 the Accusation and Amendments to Accusation. Each Respondent
18 acknowledges and understands that by withdrawing said Notices of
19 Defense they will thereby waive their right to require the
20 Commissioner to prove the allegations in the Accusation and
21 Amendments to Accusation, at a contested hearing, held in
22 accordance with the provisions of the APA and that they will waive
23 other rights afforded to them in connection with the hearing, such
24 as the right to present evidence in defense of the allegations in
25 the Accusation and Amendments to Accusation and the right to cross-
26 examine witnesses.

27 //

1 4. Respondents, pursuant to the limitations set forth
2 below, hereby acknowledge that the factual allegations in the
3 Accusation are true and correct and agree that the Real Estate
4 Commissioner shall not be required to provide further evidence of
5 such allegations.

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

16 DETERMINATION OF ISSUES

17 By reason of the foregoing stipulations, admissions and
18 waivers and solely for the purpose of settlement of the pending
19 Accusation without a hearing, it is stipulated and agreed that the
20 following determination of issues shall be made:

21 The conduct or omissions of Respondent PSMC, as set forth
22 in Paragraph 4, is in violation of Section 2831 of the Regulations
23 and constitutes cause to suspend and/or revoke PSMC's real estate
24 license and license rights under the provisions of Section 10177(d)
25 of the Business and Professions Code (hereinafter the Code), for
26 its violation of Real Estate Law.

27 //

1 The conduct or omissions of Respondent JORDAN, as set
2 forth in Paragraph 4, is in violation of Section 10130 of the Code
3 and constitutes cause to suspend or revoke his real estate license
4 and license rights under the provisions of Section 10177(d) of the
5 Code.

6 ORDER

7 WHEREFORE, THE FOLLOWING ORDER is hereby made:

8 A. Respondent PSMC's corporate real estate broker
9 license is hereby revoked.

10 B. Respondent AUSTIN SYLVESTER JORDAN's real estate
11 salesperson license is hereby revoked.

12 C. A restricted real estate salesperson license shall be
13 issued to Respondent JORDAN pursuant to Section 10156.5 of the
14 Business and Professions Code if Respondent makes application
15 therefor, and pays to the Department of Real Estate the appropriate
16 fee for said license within 120 days from the effective date of the
17 Order herein. The restricted license issued to Respondent shall be
18 subject to all of the provisions of Section 10156.7 of the Business
19 and Professions Code and to the following limitations, conditions,
20 and restrictions imposed under authority of Section 10156.6 of the
21 Code.

22 (1) The restricted license may be suspended prior to
23 hearing by Order of the Real Estate Commissioner in the event of
24 Respondent's conviction or plea of nolo contendere to a crime which
25 bears a significant relationship to Respondent's fitness or
26 capacity as a real estate licensee.

27 //

1 (2) The restricted license may be suspended prior to and
2 pending final determination after formal hearing by Order of the
3 Real Estate Commissioner based upon evidence satisfactory to the
4 Commissioner that Respondent has violated provisions of the
5 California Real Estate Law, the Subdivided Lands Law, Regulations
6 of the Real Estate Commissioner or conditions attaching to this
7 restricted license.

8 (3) Respondent shall not be eligible to apply for the
9 issuance of an unrestricted real estate license nor the removal of
10 any of the conditions, limitations or restrictions of the
11 restricted license until at least one year has elapsed from the
12 effective date of this Order.

13 (4) Respondent JORDAN shall, within six (6) months from
14 the date any restricted license is issued, take and pass the
15 Professional Responsibility Examination administered by the
16 Department including the payment of the appropriate examination
17 fee. If Respondent fails to pass said examination, the
18 Commissioner may order suspension of the restricted license until
19 Respondent passes the examination.

20 (5) Respondent JORDAN shall, within one year from the
21 date any restricted license is issued, present evidence
22 satisfactory to the Real Estate Commissioner that he has, since the
23 most recent issuance of an original or renewal real estate license,
24 taken and successfully completed the continuing education
25 requirements of Article 2.5 of Chapter 3 of the Real Estate Law for
26 renewal of a real estate license. If Respondent fails to satisfy
27 this condition, the Commissioner may order the suspension of the

1 restricted license until Respondent presents such evidence. The
2 Commissioner shall afford Respondent the opportunity for a hearing
3 pursuant to the Administrative Procedure Act to present such
4 evidence.

5 (6) With the application for license, or with the
6 application for transfer to a new employing broker, Respondent
7 JORDAN shall submit a statement signed by the prospective employing
8 broker on a form approved by the Department of Real Estate wherein
9 the employing broker shall certify as follows:

10 (a) That broker has read the Accusation which is the
11 basis for the issuance of the restricted license; and

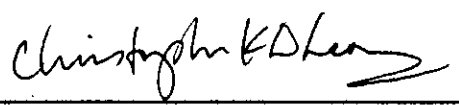
12 (b) That broker will carefully review all transaction
13 documents prepared by the restricted licensee and otherwise
14 exercise close supervision over the licensee's performance of acts
15 for which a license is required.

16 D. Any restricted license issued to Respondent JORDAN
17 under the provisions of Part 1 of Division 4 of the Business and
18 Professions Code is hereby suspended for a sixty (60) day period
19 commencing on the date said restricted license is issued.

20 The sixty (60) day suspension period shall be permanently
21 stayed if prior to the effective date of the Decision herein, said
22 Respondent, pursuant to Section 10175.2 of the Code, pays to the
23 Real Estate Recovery Account \$5,000.00. The adoption of this
24 provision in the Decision of the Real Estate Commissioner
25 constitutes a determination that it would not be against the public
26 interest to permit said Respondent to pay a monetary penalty in
27 lieu of suspension. Payment of the monetary penalty shall be by

1 certified or cashier's check made payable to the Department of Real
2 Estate.

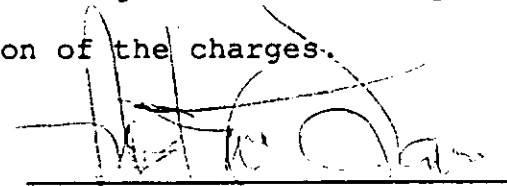
3
4 DATED: 9/10/93


CHRISTOPHER K.D. LEONG
Counsel for Complainant

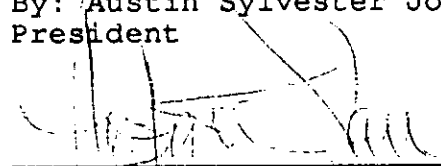
6 * * *

7 We have read the Stipulation and Agreement, and its terms
8 are understood by us and are agreeable and acceptable to us. We
9 understand that we are waiving rights given to us by the California
10 Administrative Procedure Act (including but not limited to Sections
11 11506, 11508, 11509 and 11513 of the Government Code), and we
12 willingly, intelligently and voluntarily waive those rights,
13 including the right of requiring the Commissioner to prove the
14 allegations in the Accusation at a hearing at which we would have
15 the right to cross-examine witnesses against us and to present
16 evidence in defense and mitigation of the charges.

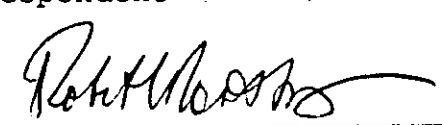
17
18 DATED: 8/19/92


PACIFIC SHORES MORTGAGE CO. INC.
Respondent
By: Austin Sylvester Jordan,
President

19
20
21
22 DATED: 8/19/92


AUSTIN SYLVESTER JORDAN
Respondent

23
24
25 DATED: _____


ROBERT L. ROSENTHAL
Attorney for Respondent
Austin Sylvester Jordan, only

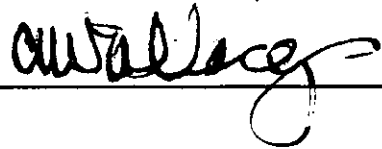
* * *

The foregoing Stipulation and Agreement in Settlement and
Order is hereby adopted as my Decision and Order and shall become
effective at 12 o'clock noon on October 27, 1993.

IT IS SO ORDERED

9/23/93

CLARK WALLACE
Real Estate Commissioner



ckdl - 27

1 Department of Real Estate
2 107 South Broadway, Room 8107
3 Los Angeles, California 90012
4
5 (213) 897-3937
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8

SEP 22 1993

DEPARTMENT OF REAL ESTATE
C. Berg

9 DEPARTMENT OF REAL ESTATE
10 STATE OF CALIFORNIA
11

12 * * * *

13 In the Matter of the Accusation of) No. H-24760 LA
14)
15 PACIFIC SHORES MORTGAGE CO. INC.,)
16 a corporation; ALBERT KONG KEONG)
17 CHANG, individually and as)
18 designated officer of Pacific)
19 Shores Mortgage Co. Inc; and)
20 AUSTIN SYLVESTER JORDAN,)
21 Respondents.)
22

23 STIPULATION AND AGREEMENT IN SETTLEMENT AND ORDER

24 It is hereby stipulated by and between ALBERT KONG KEONG
25 CHANG (hereinafter "CHANG"), represented by Robert M. Aran, and
26 the Complainant, acting by and through Christopher K.D. Leong,
27 Counsel for the Department of Real Estate, as follows for the
purpose of settling and disposing of the Accusation filed on
August 7, 1991, and amended on February 20, 1992, and June 26,
1992, in this matter.

1. All issues which were to be contested and all
evidence which was to be presented by Complainant and Respondent

1 at a formal hearing on the Accusation, which hearing was to be
2 held in accordance with the provisions of the Administrative
3 Procedures Act (APA), shall instead and in place thereof be
4 submitted solely on the basis of the provisions of this
5 Stipulation.

6 2. Respondent has received, reviewed and understands
7 the Accusation the First Amendment to Accusation, Second Amendment
8 to Accusation, the Statement to Respondent, and the Discovery
9 Provisions of the APA filed by the Department of Real Estate in
10 the above-captioned proceeding.

11 3. On August 16, 1991, Respondent CHANG, individually,
12 filed a Notice of Defense pursuant to Section 11505 of the
13 Government Code for the purpose of requesting a hearing on the
14 allegations in the Accusation and Amendments. Respondent hereby
15 freely and voluntarily withdraws said Notice of Defense to the
16 Accusation and Amendments to Accusation. Respondent acknowledges
17 that he understands that by withdrawing said Notice of Defense he
18 will thereby waive his right to require the Commissioner to prove
19 the allegations in the Accusation and Amendments to Accusation, at
20 a contested hearing, held in accordance with the provisions of the
21 APA and that he will waive other rights afforded to him in
22 connection with the hearing, such as the right to present evidence
23 in defense of the allegations in the Accusation and Amendments to
24 Accusation and the right to cross-examine witnesses.

25 4. Respondent, pursuant to the limitations set forth
26 below, hereby acknowledges that the factual allegations in
27 Paragraphs 1 through 36, are the basis for the settlement. This

1 Stipulation and Agreement also settles the issues stated in
2 Paragraphs 37 to 62. The Real Estate Commissioner shall not be
3 required to provide further evidence of such allegations.

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

14 DETERMINATION OF ISSUES

15 By reason of the foregoing stipulations, admissions and
16 waivers and solely for the purpose of settlement of the pending
17 Accusation without a hearing, it is stipulated and agreed that the
18 following determination of issues shall be made:

19 The conduct or omissions of Respondent CHANG, as set
20 forth in Paragraphs 1 through 36 of the Accusation and Amendments,
21 demonstrates a lack of supervision and constitutes cause to
22 suspend or revoke his real estate license and license rights under
23 the provisions of Section 10177(h).

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A. Respondent ALBERT KONG KEONG CHANG's real estate
broker license is hereby revoked.

(1) The restricted license may be suspended prior to
hearing by Order of the Real Estate Commissioner in the event of
Respondent's conviction or plea of nolo contendere to a crime
which bears a significant relationship to Respondent's fitness or
capacity as a real estate licensee.

(2) The restricted license may be suspended prior to
and pending final determination after formal hearing by Order of
the Real Estate Commissioner based upon evidence satisfactory to
the Commissioner that Respondent has violated provisions of the
California Real Estate Law, the Subdivided Lands Law, Regulations
of the Real Estate Commissioner or conditions attaching to the
restricted license.

11

1 (3) Respondent shall not be eligible to apply for the
2 issuance of unrestricted real estate license nor the removal of
3 any of the conditions, limitations or restrictions of the
4 restricted license until at least one year has elapsed from the
5 date of this Order. Should Respondent CHANG petition to reinstate
6 his real estate broker license, and should his petition be
7 granted, within a period of time not to exceed four years from
8 this decision date, any license granted to him as a result of said
9 petition shall be issued to him without the necessity of taking
10 the real estate broker examination.

11 (4) Respondent CHANG shall, within six (6) months from
12 the effective date of the restricted license, take and pass the
13 Professional Responsibility Examination administered by the
14 Department including the payment of the appropriate examination
15 fee. If Respondent fails to pass said examination, the
16 Commissioner may order suspension of the restricted license until
17 Respondent passes the examination.

18 (5) Respondent CHANG shall, within six (6) months from
19 the effective date of the Decision, present evidence satisfactory
20 to the Real Estate Commissioner that he has during the last four
21 years, taken and successfully completed the continuing education
22 requirements of Article 2.5 of Chapter 3 of the Real Estate Law
23 for renewal of a real estate license. If Respondent fails to
24 satisfy this condition, the Commissioner may order the suspension
25 of the restricted license until Respondent presents such evidence.
26 The Commissioner shall afford Respondent the opportunity for a
27 hearing pursuant to the Administrative Procedure Act to present

1 such evidence.

2 (6) With the application for license, or with the
3 application for transfer to a new employing broker, Respondent
4 CHANG shall submit a statement signed by the prospective employing
5 broker on a form approved by the Department of Real Estate wherein
6 the employing broker shall certify as follows:

7 (a) That broker has read the Accusation which is the
8 basis for the issuance of the restricted license; and

9 (b) That broker will carefully review all transaction
10 documents prepared by the restricted licensee and otherwise
11 exercise close supervision over the licensee's performance of acts
12 for which a license is required.

13 C. Any restricted license issued to Respondent CHANG,
14 under the provisions of Part 1 of Division 4 of the Business and
15 Professions Code, is hereby suspended for a sixty (60) day period
16 commencing on the date said restricted license is issued.

17 (1) The sixty (60) day suspension period shall be
18 permanently stayed if prior to the effective date of the Decision
19 herein said Respondent, pursuant to his petition under Section
20 10175.2 of the Code, pays to the Real Estate Recovery Account
21 \$4,000.00. The adoption of this provision in the Decision of the
22 Real Estate Commissioner constitutes a determination that it would
23 not be against the public interest to permit said Respondent to

24 //

25 //

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27 //

1 pay a monetary penalty. Payment of the monetary penalty shall be
2 by certified or cashier's check made payable to the Department of
3 Real Estate.

4
5 DATED: 8/20/93

Christopher K.D. Leong
CHRISTOPHER K.D. LEONG
Counsel for Complainant

6
7 * * * *

8 I have read the Stipulation and Agreement, and its terms
9 are understood by me and are agreeable and acceptable to me. I
10 understand that I am waiving rights given to me by the California
11 Administrative Procedure Act (including but not limited to
12 Sections 11506, 11508, 11509 and 11513 of the Government Code),
13 and I willingly, intelligently and voluntarily waive those rights,
14 including the right of requiring the Commissioner to prove the
15 allegations in the Accusation at a hearing at which I would have
16 the right to cross-examine witnesses against me and to present
17 evidence in defense and mitigation of the charges.

18
19 DATED: May 11, 1993

Albert Kong Keong Chang
ALBERT KONG KEONG CHANG
Respondent

20
21
22
23 DATED: August 19, 1993

Robert M. Aran
ROBERT M. ARAN
Attorney for ALBERT KONG KEONG CHANG

24
25 //

26 //

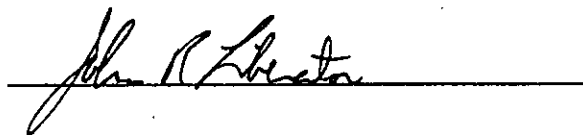
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* * * *

The foregoing Stipulation and Agreement in Settlement
and Order is hereby adopted as my Decision and Order and shall
become effective at 12 o'clock noon on October 12, 1993.

IT IS SO ORDERED September 17, 1993.

CLARK WALLACE
Real Estate Commissioner



BY: John R. Liberator
Chief Deputy Commissioner

Doc

**BEFORE THE DEPARTMENT OF REAL ESTATE
STATE OF CALIFORNIA**

FILED

FEB 27 1992

DEPARTMENT OF REAL ESTATE

BY *C. Bay*

In the Matter of the Accusation of

PACIFIC SHORES MORTGAGE CO. INC.;
ALBERT KONG KEONG CHANG;
AUSTIN SYLVESTER JORDAN,

Case No. H-24760 LA

OAH No. L-54717

Respondent

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 Office of
Administrative Hearings, 314 W. First Street, Los Angeles, CA 90012
on June 29, 1992 at 10:00 A.M.; June 30, 1992 at 9:00 A.M.
and July 1, 2 & 3, 1992 at 9:00 A.M.
or as soon thereafter as the matter can be heard, upon the Accusation served upon you.

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. The interpreter must be approved by the Administrative Law Judge conducting the hearing as someone who is proficient in both English and the language in which the witness will testify. You are required to pay the costs of the interpreter unless the Administrative Law Judge directs otherwise.

DEPARTMENT OF REAL ESTATE

Dated: February 27, 1992

cc: Pacific Shores Mtg. Co.
Albert Kong Keong Chang
Austin Sylvester Jordan
Robert Aran, Esq.
Sacto.
OAH
RL

By *Christopher K. O'Leary*
CHRISTOPHER K. O'LEARY, Counsel

RE 501 (1/92)

eb

SAC

1 Christopher K.D. Leong, Counsel
2 Department of Real Estate
3 107 South Broadway, Room 8107
4 Los Angeles, CA 90012
5 (213) 897-3937

FILED

JUN 26 1992

DEPARTMENT OF REAL ESTATE
BY C. Bey

DEPARTMENT OF REAL ESTATE

STATE OF CALIFORNIA

* * * * *

11 In the Matter of the Accusation of) No. H-24760 LA
12)
13 PACIFIC SHORES MORTGAGE CO., INC.,) SECOND AMENDMENT
14 a corporation; ALBERT KONG KEONG CHANG,) TO ACCUSATION
15 individually and as designated officer)
16 of Pacific Shores Mortgage Co. Inc.;)
17 and AUSTIN SYLVESTER JORDAN,)
18 Respondents.)
19)
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26)
27)

17 The Accusation heretofore filed on August 7, 1991,
18 and amended on February 20, 1992, in the above-mentioned
19 matter is hereby amended as follows:

20 37.

21 Complainant incorporates by reference Paragraphs 1
22 through 30, of his Accusation filed on August 7, 1991.

23 38.

24 Complainant incorporates by reference Paragraphs 31
25 through 36, of his First Amendment to Accusation filed on
26 February 20, 1992.
27

On or about March 18, 1992, the Department completed an audit of the activities of CHANG and PSMC, for the period from January 1, 1990 through December 31, 1991. The results of that audit are set forth in Paragraphs 40 through 47.

TRUST FUNDS

40.

As of December 31, 1991, in connection with real estate business activities, PSMC and CHANG accepted or received funds in trust (hereinafter trust funds) from or on behalf of property owners and tenants and thereafter made disbursements of such funds. These trust funds were maintained by Respondents PSMC and CHANG in two accounts. One bank account was a trust account at Security Pacific National Bank - Encino Terrace Office, account number 0017234649 (hereinafter TA#1). The second account was a trust account at Security Pacific National Bank - Century Plaza Office, account number 0297 178 191 (hereinafter TA#2).

41.

PSMC and CHANG violated Section 10145 of the Code and Regulation 2832.1 of the Code by disbursing or allowing the disbursement of funds from TA#1 and TA#2 combined without prior written consent of every principal who then was an owner of trust funds in said accounts wherein the disbursement reduced the balance of funds in the combined accounts as of December 31, 1991, to an amount which was

1 approximately \$2,951.15 less than the existing aggregate
2 trust fund liability to all owners of said trust funds.

3 42.

4 Also in connection with those trust funds described
5 in Paragraph 40, PSMC and CHANG:

6 (a) mixed trust funds with PSMC's general funds
7 and converted funds from TA#1 to PSMC's funds in escrow in
8 violation of Section 10176(e).

9 (b) failed to maintain complete or accurate
10 control records of trust funds received and deposited in
11 TA#1, and TA#2, in violation of Section 2831 of the
12 Regulations.

13 (c) failed to maintain a complete, accurate or
14 adequate separate record of funds received and deposited in
15 TA#1, and TA#2, in violation of Section 2831.1 of the
16 Regulations.

17 (d) failed to monthly reconcile control records
18 with the separate records for TA#1 and TA#2, in violation of
19 Section 2831.2 of the Regulations.

20 (e) allowed JORDAN to be a signatory to TA#1 and
21 TA#2 while JORDAN was not licensed to PSMC, in violation of
22 Section 2834 of the Regulations.

23 FICTITIOUS NAME

24 43.

25 At all times mentioned herein, PSMC and CHANG,
26 conducted the above-referenced mortgage loan brokerage
27 business under the fictitious business names of "Pacific

1 Shores Mortgage Corporation", although said fictitious names
2 were not placed on their broker licenses, in violation of
3 Section 2731 of the Regulations.

4 INITIAL DOCUMENTS

5 44.

6 CHANG failed to date and initial all material
7 documents prepared by licensees within five (5) days of
8 preparation, including documents prepared for: James and
9 Laura Shelters, David and Delores Brum, James and Cynthia
10 Fredrichsen and Charles Abehsera and Jacqueline Littlefield.
11 Said omission constitutes a violation of Section 2725 of the
12 Regulations.

13 NOTICE OF EMPLOYMENT

14 45.

15 At all times mentioned herein PSMC employed JORDAN,
16 who was sometimes licensed by the Department as a real estate
17 salesperson. However, PSMC failed to timely notify the
18 Department in writing of the employment of said salesperson.
19 PSMC violated Section 10161.8 of the Code and Regulation 2752
20 by failing to so notify the Department.

21 DISCLOSURE STATEMENTS

22 46.

23 At all times mentioned herein, in the conduct of
24 the above-described mortgage loan brokerage business, PSMC
25 did not provide, where appropriate, some clients who were
26 borrowers of loans secured by liens on real property with a
27 mortgage loan borrower disclosure statement approved by the

1 Department. PSMC violated Regulation 2840 by engaging in the
2 above-stated conduct.

3 47.

4 At all times mentioned herein in the conduct of the
5 above-described mortgage loan brokerage business some clients
6 who were borrowers of loans secured by liens on real property
7 did not receive or sign a mortgage loan borrower disclosure
8 statement. PSMC violated Regulation 2842.5 by engaging in
9 the above-stated conduct.

10 48.

11 From October 1988 to November 1989, JORDAN was
12 engaging in activity requiring a license including
13 negotiating loans for Mack C. Jones, Daniel V. Swan, Manuel
14 Alarcon, Gwendolyn Hooks, Terris Watson, Rene Smola, Richard
15 Otte, William Travers, Michael Fabasilio, Joyce Travers,
16 Terrilynn Cordero, Craig Rowitz, Alexander Placentia, Leon
17 Weiss, Gary Marsh, Ogden Marsh, Helene Kamzan, Angelita
18 Tolentino, Carl Dearth, Gary Small, Kamzan Hr, Robert Close,
19 Dennis Falsetti, Joseph Grimm, Gloria Ibarra, Victor Varon,
20 James Mcmeil, Stephen Elias, Howard Taylor, Ralph Payne,
21 Harvy Like, Robert Stephens. In the course of his licensed
22 activity, JORDAN ordered credit reports from Factual Data Los
23 Angeles (hereinafter Factual Data). JORDAN failed to pay
24 Factual Data approximately \$676.56, for the credit reports
25 ordered.

26 /

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1 EIGHTH CAUSE OF ACTION

2 (Violation by Respondent JORDAN and PSMC of Section 10176(i)
3 and 10177(j) of the Code)

4 49.

5 As an Eighth Cause of Accusation, Complainant
6 incorporates by this reference the Preamble and each of the
7 allegations in Paragraphs 1 through 48, hereinabove.

8 50.

9 The conduct of Respondents JORDAN and PSMC, in
10 representing JORDAN as a broker, and incurring debts not paid
11 as described in Paragraph 47, hereinabove, constitutes a
12 violation of Section 10176(i) and 10177(j) of the Code and is
13 cause to suspend or revoke the real estate licenses and
14 license rights of Respondents JORDAN and PSMC.

15 NINTH CAUSE OF ACCUSATION

16 (Violation by Respondents JORDAN and PSMC of Section 10130 of
17 the Code)

18 51.

19 As a Ninth Cause of Accusation, Complainant
20 incorporates by this reference the Preamble and each of the
21 allegations in Paragraphs 1 through 48, hereinabove.

22 52.

23 The conduct of Respondents JORDAN and PSMC, for
24 performing acts requiring a real estate license, as described
25 in Paragraph 48, hereinabove, constitutes a violation of
26 Section 10130 of the Code and is cause to suspend or revoke

27

1 the real estate licenses and license rights of Respondents
2 pursuant to Section 10177(d) of the Code.

3 TENTH CAUSE OF ACCUSATION

4 (Violation by Respondents CHANG and PSMC of Section 10137 of
5 the Code)

6 53.

7 As a Tenth Cause of Accusation, Complainant
8 incorporates by this reference the Preamble and each of the
9 allegations in Paragraph 48, hereinabove.

10 54.

11 The conduct of Respondents PSMC and CHANG, in
12 employing and compensating JORDAN for performing acts
13 requiring a real estate license, as described in Paragraph
14 48, hereinabove, constitutes a violation of Section 10137 of
15 the Code and is cause to suspend or revoke the real estate
16 licenses and license rights of Respondents PSMC and CHANG.

17 ELEVENTH CAUSE OF ACCUSATION

18 (Violation by Respondents PSMC and CHANG of Section 2725 of
19 the Regulations)

20 55.

21 As an Eleventh Cause of Accusation, Complainant
22 incorporates by this reference the Preamble and each of the
23 allegations in Paragraphs 1 through 48, hereinabove.

24 56.

25 CHANG and PSMC failed to date and initial all
26 material documents prepared by licensees within five (5) days
27 of preparation, as stated above in Paragraph 44. Said

1 omission is cause to suspend or revoke the real estate
2 licenses and license rights of Respondents CHANG and PSMC
3 under Section 10177(d) of the Code.

4 TWELFTH CAUSE OF ACCUSATION

5 (Violation by Respondents PSMC and CHANG of Sections 10145,
6 and 10177(d) of the Code and Sections 2831, 2831.1, 2831.2,
7 2834, 2840 and 2842.5 of the Regulations)

8 57.

9 As a Twelfth Cause of Accusation, Complainant
10 incorporates herein by this reference the Preamble and each
11 of the allegations in Paragraphs 1 through 48, hereinabove.

12 58.

13 The conduct of Respondents PSMC and CHANG in
14 handling trust funds as alleged in Paragraphs 40 through 42,
15 constitute violations under Sections 10145 of the Code and
16 Sections 2831, 2831.1, 2831.2, 2834, 2840 and 2842.5 of the
17 Regulations. Said conduct is cause pursuant to Section
18 10177(d) of the Code for the suspension or revocation of all
19 licenses and license rights of Respondents PSMC and CHANG
20 under Real Estate Law.

21 THIRTEENTH CAUSE OF ACCUSATION

22 (Violation by Respondents PSMC and CHANG of Section 2752 of
23 the Regulations)

24 59.

25 As a Thirteenth Cause of Accusation, Complainant
26 incorporates herein by this reference the Preamble and each
27 of the allegations in Paragraphs 1 through 48, hereinabove.

60.

The conduct of Respondents PSMC and CHANG as alleged in Paragraph 45, constitutes violation under Section 2752 of the Regulations. Said conduct is cause for the suspension or revocation of all licenses and license rights of Respondents PSMC and CHANG under Real Estate Law, pursuant to Section 10177(d) of the Code.

FOURTEENTH CAUSE OF ACCUSATION

(Violation by Respondent CHANG of Section 10177(h) of the Code)

61.

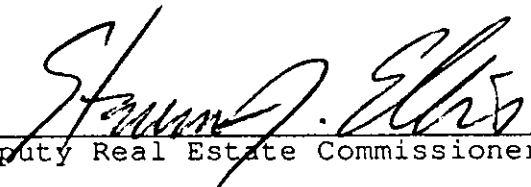
As a Fourteenth Cause of Accusation, Complainant incorporates herein by this reference the Preamble and each of the allegations in Paragraphs 1 through 48, hereinabove.

62.

The conduct of Respondent CHANG in allowing Respondents PSMC and JORDAN to violate Sections 10130, 10137, 10176(j), 10177(d), 10177(j), and 10145 of the Code and Sections 2725, 2831, 2831.1, 2831.2, 2834, 2840, 2842.5 and 2752 of the Regulations, as described hereinabove, constitutes a failure by Respondent CHANG to exercise reasonable supervision of the activities of Respondents PSMC and JORDAN which require a real estate license. Said conduct is cause for the suspension or revocation of all licenses and license rights of Respondent CHANG under Real Estate Law, pursuant to Section 10177(h) of the Code.

1 WHEREFORE, Complainant prays that a hearing be
2 conducted on the allegations of this Accusation and that upon
3 proof thereof, a decision be rendered imposing disciplinary
4 action against all licenses and license rights of Respondents
5 PACIFIC SHORES MORTGAGE CO., INC., a corporation; ALBERT
6 KONG KEONG CHANG, individually and as designated officer of
7 Pacific Shores Mortgage Co. Inc.; and AUSTIN SYLVESTER
8 JORDAN, under the Real Estate Law (Part 1 of Division 4 of
9 the Business and Professions Code) and for such other and
10 further relief as may be proper under other applicable
11 provisions of law.

12 Dated at Los Angeles, California
13 this 26th day of June, 1992.

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17 Deputy Real Estate Commissioner
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23 cc: Pacific Shores Mortgage Co.
24 Austin Sylvester Jordan
25 Albert Kong Keong Chang
26 Sacto
27 RL
Audit Section
OAH

ckdl

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BEFORE THE
DEPARTMENT OF REAL ESTATE
STATE OF CALIFORNIA

JAN 14 1992

DEPARTMENT OF REAL ESTATE
BY C. Berg

In the Matter of the Accusation of

PACIFIC SHORES MORTGAGE CO., INC.;
ALBERT KONG KEONG CHANG;
AUSTIN SYLVESTER JORDAN,

Case No. H-24760 LA

OAH No. L-54717

Respondent(s)

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 Office of Administrative Hearings, 314 W. First Street, Los Angeles, CA 90012 on the 24th, 25th, 26th, 27th, and 28th days of February, 1992, at the hour of 9:00 a.m., or as soon thereafter as the matter can be heard, upon the charges made in the Accusation served upon you.

You may be present at the hearing, and you may be represented by counsel, but you are neither required to be present at the hearing nor to be represented by counsel. If you are not present in person nor represented by counsel at the hearing, the Department may take disciplinary action against you upon any express admissions, 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. The interpreter must be approved by the hearing officer conducting the hearing as someone who is proficient in both English and the language in which the witness will testify. You are required to pay the costs of the interpreter unless the hearing officer directs otherwise.

ALSO, YOU ARE HEREBY NOTIFIED THAT A SETTLEMENT CONFERENCE WILL BE HELD WITH THE OFFICE OF ADMINISTRATIVE HEARINGS ON January 24, 1992 at 10:00 a.m.

DEPARTMENT OF REAL ESTATE

Dated: January 14, 1992

By

Christopher K.D. Leong
CHRISTOPHER K.D. LEONG, Counsel

cc: Pacific Shores Mortgage Co., Inc.
Albert Kong Keong Chang
Sacto.
OAH
RL
Robert Aran, Esq.
RE 501 (Rev. 7/87)
Austin Sylvester Jordan

SAC

BEFORE THE
DEPARTMENT OF REAL ESTATE
STATE OF CALIFORNIA

901-7 1881

C. Berg

In the Matter of the Accusation of

PACIFIC SHORES MORTGAGE CO. INC.;
ALBERT KONG KEONG;
AUSTIN SYLVESTER JORDAN,

}

Case No. H-24760 LA

OAH No. L-54717

Respondent(s)

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 Office of Administrative Hearings, 314 W. First Street, Los Angeles, CA 90012

on the 13, 14, 15, 16, days of January, 1992, at the hour of 9:00 a.m., or as soon thereafter as the matter can be heard, upon the charges made in the Accusation served upon you.

You may be present at the hearing, and you may be represented by counsel, but you are neither required to be present at the hearing nor to be represented by counsel. If you are not present in person nor represented by counsel at the hearing, the Department may take disciplinary action against you upon any express admissions, 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. The interpreter must be approved by the hearing officer conducting the hearing as someone who is proficient in both English and the language in which the witness will testify. You are required to pay the costs of the interpreter unless the hearing officer directs otherwise.

DEPARTMENT OF REAL ESTATE

By

Christopher K. Leong

CHRISTOPHER K. LEONG, Counsel

Dated: October 7, 1991

cc: Pacific Shores Mortgage Co. Inc.
Albert Kong Keong
Austin Sylvester Jordan

Sacto.

OAH

RL

RE 501 (Rev. 7/87)

1 Christopher K.D. Leong, Counsel
2 Department of Real Estate
3 107 South Broadway, Room 8107
4 Los Angeles, CA 90012
5 (213) 897-3937

FILED
FEB 20 1992

DEPARTMENT OF REAL ESTATE
BY C. Bong

8 DEPARTMENT OF REAL ESTATE

9 STATE OF CALIFORNIA

10 * * * * *

11 In the Matter of the Accusation of) No. H-24760 LA
12)
12 PACIFIC SHORES MORTGAGE CO., INC.,) FIRST AMENDMENT
13 a corporation; ALBERT KONG KEONG CHANG,) TO ACCUSATION
13 individually and as designated officer)
14 of Pacific Shores Mortgage Co. Inc.;)
14 and AUSTIN SYLVESTER JORDAN,)
15 Respondents.)

16
17 The Accusation heretofore filed on August 7, 1991,
18 in the above-mentioned matter is hereby amended as follows:

19 31.

20 Complainant incorporates by reference Paragraphs 1
21 through 30, of his Accusation filed on August 7, 1991.

22 32.

23 Paragraph 8 of the Accusation is amended to add the
24 following names on line 27: Catherine Dale and David W.
25 Dale, Donna Tavares and Ray Vakili.

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33.

Paragraphs 16, 17 and 18, are amended as follows.
"At all times mentioned herein" is amended to read "From
January 1, 1989 through October 31, 1990".

34.

From October 24, 1988 through November 14, 1989,
Respondent JORDAN represented himself to members of the
public including those named in Paragraphs 8 and 32, that
JORDAN was a real estate broker.

SEVENTH CAUSE OF ACTION

(Violation by Respondent JORDAN and PSMC of Section 10176(i)
and 10177(j) of the Code)

35.

As a Seventh Cause of Accusation, Complainant
incorporates by this reference the Preamble and each of the
allegations in Paragraphs 1 through 34, hereinabove.

36.

The conduct of Respondents JORDAN and PSMC, in
representing JORDAN as a broker as described in Paragraph 34,
hereinabove, constitutes a violation of Section 10176(i) and
10177(j) of the Code and is cause to suspend or revoke the
real estate licenses and license rights of Respondents JORDAN
and PSMC.

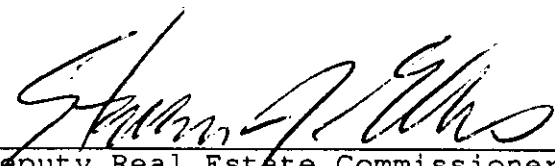
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1 WHEREFORE, Complainant prays that a hearing be
2 conducted on the allegations of this Accusation and that upon
3 proof thereof, a decision be rendered imposing disciplinary
4 action against all licenses and license rights of Respondents
5 PACIFIC SHORES MORTGAGE CO., INC., a corporation; ALBERT
6 KONG KEONG CHANG, individually and as designated officer of
7 Pacific Shores Mortgage Co. Inc.; and AUSTIN SYLVESTER
8 JORDAN, under the Real Estate Law (Part 1 of Division 4 of
9 the Business and Professions Code) and for such other and
10 further relief as may be proper under other applicable
11 provisions of law.
12 Dated at Los Angeles, California
13 this 20th day of February, 1992.

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17 Deputy Real Estate Commissioner
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24 cc: Pacific Shores Mortgage Co.
25 Austin Sylvester Jordan
26 Albert Kong Keong Chang
27 Sacto
RL
Audit Section

ckdl

1 Christopher K.D. Leong, Counsel
2 Department of Real Estate
3 107 South Broadway, Room 8107
4 Los Angeles, CA 90012
5 (213) 620-4790

AUG-7 1991

DEPARTMENT OF REAL ESTATE
BY

8 DEPARTMENT OF REAL ESTATE

9 STATE OF CALIFORNIA

10 * * * * *

11 In the Matter of the Accusation of) No. H-24760 LA
12)
12 PACIFIC SHORES MORTGAGE CO., INC.,) ACCUSATION
13 a corporation; ALBERT KONG KEONG CHANG,)
13 individually and as designated officer)
14 of Pacific Shores Mortgage Co. Inc.;)
14 and AUSTIN SYLVESTER JORDAN,)
15 Respondents.)

16
17 The Complainant, Steven J. Ellis, a Deputy Real Estate
18 Commissioner of the State of California, for cause of Accusation
19 against PACIFIC SHORES MORTGAGE CO., INC., a corporation
20 (hereinafter "PSMC"); ALBERT KONG KEONG CHANG, individually and as
21 designated officer of Pacific Shores Mortgage Co. Inc.
22 (hereinafter "CHANG"); and AUSTIN SYLVESTER JORDAN (hereinafter
23 "JORDAN") (hereinafter sometimes referred to as Respondents) is
24 informed and alleges as follows:

25 1.

26 The Complainant, Steven J. Ellis, a Deputy Real Estate
27 Commissioner of the State of California, makes this Accusation

1 against Respondents in his official capacity.

2 2.

3 All Sections of Title 10, Chapter 6, California Code of
4 Regulations, are hereinafter referred to as "Regulations".

5 3.

6 From November 1, 1989 to present, PSMC, was licensed by
7 the Department of Real Estate of the State of California
8 (hereinafter "Department") as a corporate real estate broker.

9 From January 1, 1989 to November 1, 1989, PSMC, was not licensed
10 by the Department.

11 4.

12 At all times herein mentioned, ALBERT KONG KEONG
13 CHANG, was licensed by the Department as a real estate
14 broker in his individual capacity. From November 1, 1989,
15 to present, CHANG was the designated officer of PSMC. As the
16 designated officer of PSMC, CHANG was responsible under
17 Section 10159.2 of the Code for the supervision of the
18 activities of the officers and employees as necessary to
19 secure full compliance with the Real Estate Law.

20 5.

21 All further reference to PSMC shall be deemed to
22 refer to, in addition to said respondent, the officers,
23 directors, employees, agents and real estate licensees
24 employed by or associated with PSMC who at all times
25 mentioned herein were engaged in the furtherance of the
26 business or operations of PSMC and who were acting in the
27 course and scope of their authority and employment.

1 6.

2 From January 1, 1989 to present, in Los Angeles
3 County, California, PSMC, engaged in the business of, acted
4 in the capacity of, advertised or assumed to act as a real
5 estate broker in the State of California, within the meaning
6 of Sections 10131(d) and 10131.2 of the Code, including the
7 operation of a mortgage loan brokerage business with the
8 public, wherein lenders and borrowers were solicited for
9 loans secured directly or collaterally by liens on real
10 property, wherein such loans were arranged, negotiated,
11 processed, and consummated on behalf of others and for fees
12 often collected in advance. At all times mentioned herein,
13 in the course of operating said mortgage loan brokerage
14 business, PSMC assumed to act under the exemption from the
15 provision of the Escrow Law as provided by Section 17006(d)
16 of the California Financial Code.

17 UNLICENSED ACTIVITY

18 7.

19 From October 24, 1988 to November 14, 1989, JORDAN, was
20 not licensed by the Department as his real estate salesperson
21 license was suspended.

22 8.

23 From on or about January 1, 1989, to present, PSMC,
24 and JORDAN acted as agents negotiating loans secured by liens
25 on real property for various owners including, but not
26 limited to, Jude T. Tavares, Carol Canada, David and Pamela
27 J. Russel and Louisa Vakili.

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9.

From on or about November 1, 1989 to present, CHANG, and PSMC, employed and compensated JORDAN, as an agent to negotiate loans secured by liens on real property.

10.

The activities of JORDAN and PSMC, described above in Paragraphs 7 through 9, are acts requiring a real estate license as described in Section 10131(d) of the Code. In employing and compensating JORDAN between November 1, 1989 and November 14, 1989, for said acts when he was not licensed by the Department, CHANG and PSMC violated Section 10137 of the Code.

11.

JORDAN and PSMC, violated Section 10130 of the Code by engaging in the activities set forth in Paragraphs 7 through 9, at those times when they were not licensed as a real estate broker or a real estate salesperson.

12.

On or about January 3, 1991, the Department completed an audit of the activities of CHANG and PSMC, for the period from January 1, 1989 through October 31, 1990. The results of that audit are set forth in Paragraphs 13 through 18.

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1 deposited in TA#1, and dates of deposits made in TA#1 were
2 not recorded on the escrow cash receipt records, in violation
3 of Section 2831 of the Regulations.

4 (b) failed to maintain an adequate separate record
5 of funds received and deposited in TA#1, including dates of
6 deposits, in violation of Section 2831.1 of the Regulations.

7 (c) failed to monthly reconcile control records
8 with the separate records, in violation of Section 2831.2 of
9 the Regulations.

10 FICTITIOUS NAME

11 16.

12 At all times mentioned herein, PSMC and CHANG,
13 conducted the above-referenced mortgage loan brokerage
14 business under the fictitious business names of "1st Lenders
15 Escrow Company" and "Pacific Shores Mortgage Corporation",
16 although said fictitious names were not placed on their
17 broker licenses, in violation of Section 2731 of the
18 Regulations.

19 NOTICE OF EMPLOYMENT

20 17.

21 At all times mentioned herein PSMC employed JORDAN,
22 Russell S. Hyzen, and Frances J. Forbes who are each licensed
23 by the Department as real estate salespersons. However, PSMC
24 failed to timely notify the Department in writing of the
25 employment of said salespersons. PSMC violated Section
26 10161.8 of the Code and Regulation 2752 by failing to so
27 notify the Department.

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1 SECOND CAUSE OF ACCUSATION

2 (Violation by Respondents CHANG and PSMC of Section 10137 of
3 the Code)

4 21.

5 As a Second Cause of Accusation, Complainant
6 incorporates by this reference the Preamble and each of the
7 allegations in Paragraphs 1 through 18, hereinabove.

8 22.

9 The conduct of Respondents PSMC and CHANG, in
10 employing and compensating JORDAN for performing acts
11 requiring a real estate license, as described in Paragraphs 7
12 through 11, hereinabove, constitutes a violation of Section
13 10137 of the Code and is cause to suspend or revoke the real
14 estate licenses and license rights of Respondents PSMC and
15 CHANG.

16 THIRD CAUSE OF ACCUSATION

17 (Violation by Respondents PSMC and CHANG of Section 2725 of
18 the Regulations)

19 23.

20 As a Third Cause of Accusation, Complainant
21 incorporates by this reference the Preamble and each of the
22 allegations in Paragraphs 1 through 18, hereinabove.

23 24.

24 CHANG and PSMC failed to date and initial all
25 material documents prepared by licensees within five (5) days
26 of preparation. Said omission is cause to suspend or revoke
27

1 the real estate license and license rights of Respondents
2 CHANG and PSMC under Section 10177(d) of the Code.

3 FOURTH CAUSE OF ACCUSATION

4 (Violation by Respondents PSMC and CHANG of Sections 10145,
5 and 10177(d) of the Code and Sections 2831, 2831.1, 2831.2
6 and 2840 of the Regulations)

7 25.

8 As a Fourth Cause of Accusation, Complainant
9 incorporates herein by this reference the Preamble and each
10 of the allegations in Paragraphs 1 through 18, hereinabove.

11 26.

12 The conduct of Respondents PSMC and CHANG in
13 handling trust funds as alleged in Paragraphs 12 through 18,
14 constitute violations under Sections 10145 of the Code and
15 Sections 2831, 2831.1, 2831.2 and 2840 of the Regulations.
16 Said conduct is cause pursuant to Section 10177(d) of the
17 Code for the suspension or revocation of all licenses and
18 license rights of Respondents PSMC and CHANG under Real
19 Estate Law.

20 FIFTH CAUSE OF ACCUSATION

21 (Violation by Respondents PSMC and CHANG of Section 2752 of
22 the Regulations)

23 27.

24 As a Fifth Cause of Accusation, Complainant
25 incorporates herein by this reference the Preamble and each
26 of the allegations in Paragraphs 1 through 18, hereinabove.

27 /

1 28.

2 The conduct of Respondents PSMC and CHANG as
3 alleged in Paragraph 17, constitutes violation under Section
4 2752 of the Regulations. Said conduct is cause for the
5 suspension or revocation of all licenses and license rights
6 of Respondents PSMC and CHANG under Real Estate Law, pursuant
7 to Section 10177(d) of the Code.

8 SIXTH CAUSE OF ACCUSATION

9 (Violation by Respondent CHANG of Section 10177(h) of the
10 Code)

11 29.

12 As a Sixth Cause of Accusation, Complainant
13 incorporates herein by this reference the Preamble and each
14 of the allegations in Paragraphs 1 through 18, hereinabove.

15 30.

16 The conduct of Respondent CHANG in allowing
17 Respondents PSMC and JORDAN to violate Sections 10130, 10137,
18 10177(d), and 10145 of the Code and Sections 2725, 2831,
19 2831.1, 2831.2, 2840 and 2752 of the Regulations, as
20 described hereinabove, constitutes a failure by Respondent
21 CHANG to exercise reasonable supervision of the activities of
22 Respondents PSMC and JORDAN which require a real estate
23 license. Said conduct is cause for the suspension or
24 revocation of all licenses and license rights of Respondent
25 CHANG under Real Estate Law, pursuant to Section 10177(h) of
26 the Code.

27