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FILED
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DEPARTMENT OF REAL ESTATE

By K. H. Hinderberg

DEPARTMENT OF REAL ESTATE

STATE OF CALIFORNIA

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In the Matter of the Accusation of)	No. H-27344 LA
CHUNG SHUNG LO,)	A C C U S A T I O N
)	
Respondent.)	

The Complainant, Thomas McCrady, a Deputy Real Estate Commissioner of the State of California, for cause of accusation against CHUNG SHUNG LO, aka Chong Shung Lo, aka Shung Chung Lo, and aka Ester Chung Shung Lo Chu, is informed and alleges in his official capacity as follows:

I

Respondent is presently licensed and/or has license rights under the Real Estate Law (Part 1 of Division 4 of the California Business and Professions Code). All references to the "Code" are to the California Business and Professions Code and all references to "Regulations" are to Chapter 6, Title 10, California Code of Regulations (Regulations).



II

On November 24, 1986, Respondent was originally licensed by the Department of Real Estate of the State of California as a real estate salesperson. On November 24, 1986, Respondent was originally licensed as a real estate broker.

III

On November 14, 1994, Respondent submitted to the Department a Broker Renewal Application that contained false statements or material misstatements of fact, to wit, her sex as female, a date of birth of October 23, 1947, and a Social Security Number of 530-13-7466. This information conflicts with prior information furnished to the Department by Respondent.

IV

On November 29, 1995, Respondent submitted to the Department a Broker License Application for a restricted real estate broker license that contained false statements or material misstatements of fact, to wit, her sex as female, a date of birth of December 13, 1948, a Social Security Number of 530-13-7466, and a name change from Chung Shung Lo to Shung Chung Lo. This information conflicts with prior information furnished to the Department by Respondent.

V

Moreover, Respondent LO failed to notify the Department of her present business address. LO provided an address as her office and principal place of business that in reality was a storage facility. This conduct constitutes a violation of Section 10162 of the Code and Section 2715 of the Regulations and



1 is cause to suspend or revoke the real estate license and license
2 rights of Respondent LO under Sections 10165 and 10177(d) of the
3 Code.

4 VI

5 Respondent's failure to disclose the true facts
6 concerning her identify, as set forth in Paragraphs III and IV,
7 above, in said applications for renewal and licensure
8 respectively, constitutes the procurement of a real state
9 license by fraud, misrepresentation or deceit, or by making a
10 material misstatements of fact and is cause for suspension or
11 revocation of Respondent's real estate license or license rights
12 under Sections 498 and 10177(a) of the Code. Said order granted
13 Respondent the right to receive a restricted real estate broker
14 license which was issued to Respondent on December 5, 1995, a
15 condition of said license required Respondent to submit evidence
16 of the completion of continuing education and of passing the
17 professional responsibility examination by September 5, 1996 and
18 June 5, 1996, respectively.

19 Prior Discipline

20 VII

21 Effective November 9, 1995, in Case No. H-6932 SF, an
22 Order Denying Reconsideration was filed against Respondent LO
23 that resulted in discipline for said Respondent for violations of
24 Sections 10145, 10148 and 10177(d) of the Code and Sections 2715,
25 2830, 2831 and 2831.2 of the Regulations.

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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 the license and license rights of Respondent
5 CHUNG SHUNG LO, under the Real Estate Law (Part 1 of Division 4
6 of the Business and Professions Code) and for such other and
7 further relief as may be proper under other applicable
8 provisions of law.

9 Dated at Los Angeles, California
10 this 9th day of September, 1997.

11 THOMAS MC CRADY

12 Deputy Real Estate Commissioner
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25 cc: Chung Shung Lo
26 Sacto.
27 CW

