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FILED  
OCT 31 1997  
DEPARTMENT OF REAL ESTATE  
By K. Niederhold

8 DEPARTMENT OF REAL ESTATE  
9 STATE OF CALIFORNIA

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11 In the Matter of the Accusation of )	No. H-27344 LA
12 CHUNG SHUNG LO, )	<u>AMENDMENT TO ACCUSATION</u>
13 )	
14 Respondent. )	

15 The Accusation filed on September 9, 1997, is amended  
16 in its entirety as follows:

17  
18 The Complainant, Thomas McCrady, a Deputy Real Estate  
19 Commissioner of the State of California, for cause of accusation  
20 against CHUNG SHUNG LO, aka Chong Shung Lo, aka Shung Chung Lo,  
21 aka Ester Chu, and aka Ester Chung Shung Lo Chu, is informed and  
22 alleges in his official capacity as follows:

23 I

24 Respondent is presently licensed and/or has license  
25 rights under the Real Estate Law (Part 1 of Division 4 of the  
26 California Business and Professions Code). All references to the  
27 "Code" are to the California Business and Professions Code and all

1 references to "Regulations" are to Chapter 6, Title 10, California  
2 Code of Regulations (Regulations).

3 II

4 On November 24, 1986, Respondent was originally licensed  
5 as a real estate broker. Effective November 9, 1995, Respondent's  
6 license was revoked with right to a restricted real estate broker  
7 license pursuant to Case No. H-6932 SF, and a restricted broker  
8 license was issued to Respondent on December 5, 1995. This  
9 restricted real estate broker license was suspended on October 16,  
10 1997.

11 III

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

18 IV

19 On November 29, 1995, Respondent submitted to the  
20 Department a Broker License Application for a restricted real  
21 estate broker license that contained false statements or material  
22 misstatements of fact, to wit, her sex as female, a date of birth  
23 of December 13, 1948, a Social Security Number of 530-13-7466, and  
24 a name change from Chung Shung Lo to Shung Chung Lo. This  
25 information conflicts with prior information furnished to the  
26 Department by Respondent. In this application Respondent also  
27 failed to reveal the conviction set forth in Paragraph V.



V

On February 24, 1989, in the United States District Court for the District of Nevada, Respondent was convicted upon a plea of nolo contendere of violating one count of 26 USC 7201 (Income Tax Evasion), a felony crime by its facts and circumstances that involve moral turpitude and is substantially related under Section 2910, Chapter 6, Title 10 of the California Code of Regulations, to the qualifications, functions or duties of a real estate licensee.

VI

Respondent LO has failed to notify the Department of her present business address. LO provided an address purporting to be 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 is cause to suspend or revoke the real estate license and license rights of Respondent LO under Sections 10165 and 10177(d) of the Code.

VII

Respondent's failure to disclose the true facts concerning her identify, as set forth in Paragraphs III and IV, in said applications for renewal and licensure respectively, constitutes making a material misstatement of fact in a license application of a request for renewal and is cause for suspension or revocation of Respondent's real estate license or license rights under Sections 498 and 10177(a) of the Code.

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VIII

Respondent's failure disclose the conviction set forth in Paragraph V, in her November 29, 1995, Broker License Application for a restricted real estate broker license, constitutes the procurement of a real state license by fraud, misrepresentation or deceit, or by making a material misstatements of fact and is cause for suspension or revocation of Respondent's real estate license or license rights under Sections 498 and 10177(a) of the Code.

Prior Discipline

IX

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

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

Dated at Los Angeles, California  
this 31st day of October, 1997.

THOMAS MC CRADY

Deputy Real Estate Commissioner

cc: Chung Shung Lo  
Sacto.  
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