

FILED
JUL 21 2003
DEPARTMENT OF REAL ESTATE

Anna B. Chua

BEFORE THE DEPARTMENT OF REAL ESTATE
STATE OF CALIFORNIA

* * *

In the Matter of the Accusation of) NO. H-27484 LA
)
FIRST & LA REALTY CORPORATION;)
and, ROBERT LA VERN CONLEE,)
individually and as designated)
officer of First & LA Realty)
Corporation,)
)
Respondent.)

ORDER DENYING REINSTATEMENT OF LICENSE

On April 29, 1998, a Decision was rendered herein
revoking the corporate real estate broker license of
FIRST & LA REALTY CORPORATION and the real estate broker
license of ROBERT LA VERN CONLEE. Respondents were given the
right to apply for and receive restricted real estate broker
licenses. Restricted real estate broker licenses were issued
to Respondents on May 26, 1998.

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1 On or about December 15, 2000, Respondents petitioned
2 for reinstatement of their real estate licenses and the
3 Attorney General of the State of California has been given
4 notice of the filing of the petition.
5

6 I have considered Respondents' petitions and
7 the evidence and arguments in support thereof. Respondents
8 have failed to demonstrate to my satisfaction that Respondents
9 have undergone sufficient rehabilitation to warrant the
10 reinstatement of Respondents' real estate broker licenses, in
11 that:
12

13 I

14 In the Decision which revoked Respondents' real
15 estate broker licenses, there was a Determination of Issues
16 made that there was cause to revoke Respondents' licenses
17 pursuant to Business and Professions Code ("Code") Sections
18 10177(d) and 10177(h).
19

20 A Department of Real Estate ("Department") audit of
21 Respondent's books and records had found violations of the
22 Real Estate Law. Respondent FIRST & LA REALTY CORPORATION was
23 found to have violated Code Section 10145 and Sections 2831.2,
24 and 2834 of Title 10, Chapter 6, California Code of Regulations
25 ("Regulations"). Respondent ROBERT LA VERN CONLEE was found to
26 have violated Code Section 10159.2 by failing to reasonably
27 supervise the corporation.

II

Respondent's petition for reinstatement of his license is governed by the Criteria of Rehabilitation set forth in the California Administrative Code, Section 2911, Title 10, Chapter 6, California Code of Regulations ("Regulations"). Section 2911 provides as follows: "The following criteria have been developed by the department pursuant to Section 482(a) of the Business and Professions Code for the purpose of evaluating the rehabilitation of an applicant for issuance or for reinstatement of a license in considering whether or not to deny the issuance or reinstatement on account of a crime or act committed by the applicant."

The Criteria of Rehabilitation as applied to Respondents is as follows: Regulation 2911 (a) two (2) years since audit violations; (b) restitution is not applicable; (c) expungement of conviction is not applicable; (d) registration pursuant to Penal Code Section 290 is not applicable; (e) completion of probation is not applicable; (f) abstinence from use of alcohol does not appear to be applicable; (g) payment of fine or monetary penalty is not applicable; (h) stable family life appears to exist (i) completion of educational or vocational training courses, as Respondent CONLEE has completed 45 hours of continuing education courses; (j) there is no proof of past due debts;

1 (l) Respondent CONLEE is involved in community or social
2 programs; (m) Respondents have new social and business
3 relationships.

4
5 III

6 In 2001 a Department audit was performed of
7 Respondents' books and records. The audit found violations
8 of Code Section 10145 and Regulations 2731, 2832 and 2834.
9 Some of the same violations that resulted in the discipline
10 of Respondents' licenses had been found. This evidences a
11 lack of rehabilitation and is cause to deny Respondents'
12 petition applications pursuant to Regulation 2911(k).
13

14 IV

15 Evidence of a change in attitude was not submitted
16 from persons familiar with Respondents previous conduct and
17 subsequent attitudes and behavioral patterns. This evidences
18 lack of rehabilitation and is cause to deny Respondents'
19 petition applications pursuant to Regulation 2911(n)(2).
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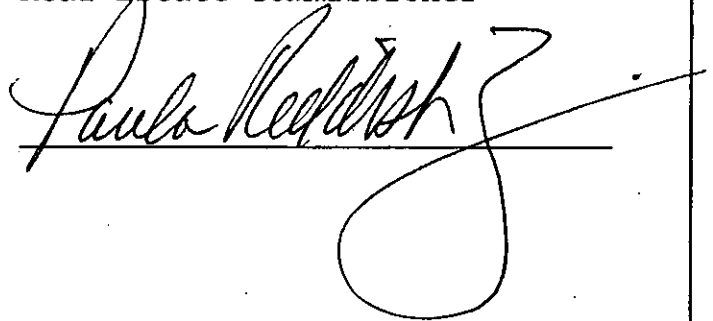
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1 NOW, THEREFORE, IT IS ORDERED that Respondents'
2 petitions for reinstatement of Respondents' real estate broker
3 licenses are denied.

4 This Order shall become effective at 12 o'clock noon
5 on August 11, 2003

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7 DATED: July 10, 2003

8 PAULA REDDISH ZINNEMANN
9 Real Estate Commissioner

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24 cc: First & LA Realty Corporation
25 1955 First Street
26 Simi Valley, CA 93065

27 Robert Lavern Conlee
785 Twillin Court
Simi Valley, CA 93065

1 Department of Real Estate
2 107 South Broadway, Room 8107
3 Los Angeles, California 90012

4 (213) 897-3937

FILED
MAY - 5 1998
DEPARTMENT OF REAL ESTATE

By K. Mederholt

8 DEPARTMENT OF REAL ESTATE

9 STATE OF CALIFORNIA

10 * * * *

11 In the Matter of the Accusation of)
12 FIRST & LA REALTY CORPORATION;)
13 and ROBERT LA VERNE CONLEE,)
14 individually and as)
15 designated officer of First,)
16 & LA Realty Corporation,)
Respondents.)

NO. H-27484 LA

STIPULATION AND AGREEMENT

17 It is hereby stipulated by and between and Matthew R.
18 Eccles, Counsel for FIRST & LA REALTY CORPORATION and ROBERT LA
19 VERNE CONLEE individually and as designated officer of First & LA
20 Realty Corporation., (sometimes collectively referred to as
21 Respondents), and the Complainant, acting by and through Elliott
22 Mac Lennan, Counsel for the Department of Real Estate, as follows
23 for the purpose of settling and disposing of the Accusation filed
24 on December 12, 1997, in this matter:

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

2. Respondents have received, read and understand the Statement to Respondent, the Discovery Provisions of the APA and the Accusation filed by the Department of Real Estate in this proceeding.

3. On January 12, 1998, Respondents filed a Notice of Defense pursuant to Section 11506 of the Government Code for the purpose of requesting a hearing on the allegations in the Accusation. Respondents hereby freely and voluntarily withdraw said Notice of Defense. Respondents acknowledge that they understand that by withdrawing said Notice of Defense they thereby waive their right to require the Commissioner to prove the allegations in the Accusation at a contested hearing held in accordance with the provisions of the APA and that they will waive other rights afforded to them in connection with the hearing such as the right to present evidence in their defense the right to cross-examine witnesses.

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1 4. This Stipulation is based on the factual allegations
2 contained in the Accusation. In the interest of expedience and
3 economy, Respondents choose not to contest these allegations, but
4 to remain silent and understand that, as a result thereof, these
5 factual allegations, without being admitted or denied, will serve
6 as a prima facie basis for the disciplinary action stipulated to
7 herein. The Real Estate Commissioner shall not be required to
8 provide further evidence to prove said factual allegations.

9 5. This Stipulation is based on Respondents' decision
10 not to contest the allegations set forth in the Accusation as a
11 result of the agreement negotiated between the parties. This
12 Stipulation is expressly limited to this proceeding and any
13 further proceeding initiated by or brought before the Department
14 of Real Estate based upon the facts and circumstances alleged in
15 the Accusation, for the sole purpose of reaching an agreed
16 disposition of this proceeding. The decision of Respondents' not
17 to contest the factual statements alleged is made solely for the
18 purpose of effectuating this Stipulation. It is the intent and
19 understanding of the parties that this Stipulation shall not be
20 binding or admissible against Respondents in any actions against
21 Respondents by third parties.

22 6. It is understood by the parties that the Real Estate
23 Commissioner may adopt the Stipulation as his Decision in this
24 matter thereby imposing the penalty and sanctions on Respondents'
25 real estate licenses and license rights as set forth in the
26 "Order" herein below. In the event that the Commissioner in his
27 discretion does not adopt the Stipulation, the Stipulation shall

1 be void and of no effect, and Respondents shall retain the right
2 to a hearing and proceeding on the Accusation under the provisions
3 of the APA and shall not be bound by any stipulation or waiver
4 made herein.

5 7. The Order or any subsequent Order of the Real Estate
6 Commissioner made pursuant to this Stipulation shall not
7 constitute an estoppel, merger or bar to any further
8 administrative or civil proceedings by the Department of Real
9 Estate with respect to any matters which were not specifically
10 alleged to be causes for accusation in this proceeding.

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1 DETERMINATION OF ISSUES

2 By reason of the foregoing stipulations and solely for
3 the purpose of settlement of the pending Accusation without a
4 hearing, it is stipulated and agreed that the following
5 determination of issues shall be made:

6 I

7 The conduct of Respondent FIRST & LA REALTY CORPORATION,
8 as described in Paragraph 4, is in violation of Section 10145 of
9 the Business and Professions Code (Code) and Sections 2831.2 and
10 2834 of Title 10, Chapter 6 of the California Code of Regulations
11 (Regulations) and is a basis for the suspension or revocation of
12 Respondent's license and license rights as a violation of the Real
13 Estate Law pursuant to Section 10177(d) of the Code.

14 II

15 The conduct of Respondent ROBERT LA VERNE CONLEE,
16 as described in Paragraph 4, constitutes a failure to keep FIRST &
17 LA REALTY CORPORATION in compliance with the Real Estate Law
18 during the time that he was the officer designated by a corporate
19 broker licensee and constitutes a failure to exercise reasonable
20 supervision and control over the licensed activities of FIRST & LA
21 REALTY CORPORATION and its salespersons which require a real
22 estate license. This is a basis for the suspension or revocation
23 of his license pursuant to Sections 10159.2 and 10177(h) of the
24 Code.

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1 provisions of the California Real Estate Law, the Subdivided Lands
2 Law, Regulations of the Real Estate Commissioner or conditions
3 attaching to said restricted license.

4 C. Respondents shall obey all laws of the United
5 States, the State of California and its political subdivisions,
6 and shall further obey and comply with all rules and regulations
7 of the Real Estate Commissioner.

8 D. Respondents shall not be eligible for the issuance
9 of unrestricted real estate licenses nor the removal of any of the
10 conditions, limitations or restrictions of the restricted licenses
11 until at least two (2) years has elapsed from the issuance of any
12 restricted real estate license or licenses.

13 E. Respondent ROBERT LA VERNE CONLEE shall, within
14 twelve (12) months from the effective date of the Order, present
15 evidence satisfactory to the Real Estate Commissioner that he has,
16 since the most recent issuance of an original or renewal real
17 estate license, taken and successfully completed the continuing
18 education requirements of Article 2.5 of Chapter 3 of the Real
19 Estate Law for renewal of a real estate license. If Respondent
20 fails to satisfy this condition, the Commissioner may order the
21 suspension of the restricted license until the Respondent presents
22 such evidence. The Commissioner shall afford Respondent the
23 opportunity for a hearing pursuant to the Administrative Procedure
24 Act to present such evidence.

25 F. Respondent CONLEE shall within six (6) months from
26 the effective date of the Order, take and pass the Professional
27 Responsibility Examination administered by the Department including



1 the payment of the appropriate examination fee. If Respondent
2 fails to satisfy this condition, the Commissioner may order
3 suspension of the restricted license until Respondent passes the
4 examination.

5 II

6 A. Respondent FIRST & LA REALTY CORPORATION, INC.,
7 and/or ROBERT LA VERNE CONLEE shall pay, pursuant to Section 10148
8 of the Code, the Commissioner's reasonable cost for an audit to
9 determine if Respondent is presently in compliance with the Real
10 Estate Law. In calculating the amount of the Commissioner's
11 reasonable costs, the Commissioner may use the estimated average
12 hourly salary for all Department audit section personnel
13 performing audits of real estate brokers, and shall include an
14 allocation for travel costs, including mileage, time to and from
15 the auditor's place of work, and per diem in total amount not to
16 exceed \$3,400.

17 (1) Respondents shall pay such cost within forty-five
18 (45) days of receipt of an invoice from the Commissioner detailing
19 the activities performed during the audit and the amount of time
20 spent performing those activities.

21 (2) If Respondents, or either of them, fail to pay,
22 within forty-five (45) days from receipt of the invoice specified
23 above, the Commissioner's reasonable costs for an audit to
24 determine if Respondent is presently in compliance with the Real
25 Estate Law, the Commissioner may order the indefinite suspension
26 of Respondents' or either of them, restricted real estate licenses
27 and license rights. The suspension shall remain in effect until



1 payment is made in full, or until Respondents enter into an
2 agreement satisfactory to the Commissioner to provide for such
3 payment. The Commissioner may impose further reasonable
4 disciplinary terms and conditions upon Respondents' real estate
5 license and license rights as part of any such agreement.

6
7 DATED: 3-5-98

elliott
8 ELLIOTT MAC LENNAN
9 Counsel for Complainant

10 * * * *

11 EXECUTION OF THE STIPULATION

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

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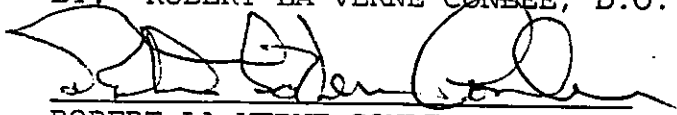
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3 DATED:

4-13-98


FIRST & LA REALTY CORPORATION
Respondent,
BY: ROBERT LA VERNE CONLEE, D.O.

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6 DATED:

4-13-98


ROBERT LA VERNE CONLEE,
individually and as designated
officer of First & La Realty
Corporation, Respondent

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8
9 DATED:

4/13/98


MATTHEW R. ECCLES,
Counsel for Respondents

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11 * * * *

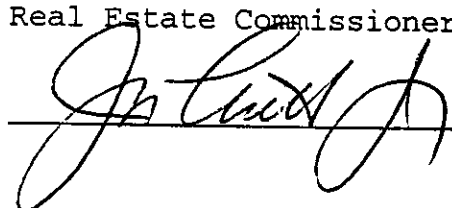
12 The foregoing Stipulation and Agreement is hereby
13 adopted as my decision and Order and shall become effective at 12
14 o' clock noon on May 26, 1998.

15 IT IS SO ORDERED

4/29

, 1998.

16 JIM ANTT JR.
17 Real Estate Commissioner

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

FILED
MAR 16 1998
DEPARTMENT OF REAL ESTATE

In the Matter of the Accusation of

FIRST & LA REALTY CORPORATION
and ROBERT LA VERN CONLEE,

Case No.

By K. Knebelholz
H-27484 LA

OAH No.

L-1998010311

Respondent

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, 107 South Broadway, Second Floor
Los Angeles, CA 90012

on April 15, 1998, at the hour of 9:00 a.m.,
or as soon thereafter as the matter can be heard, upon the Accusation served upon you. If you object to the place of
hearing, you must notify the presiding administrative law judge of the Office of Administrative Hearings within ten
(10) days after this notice is served on you. Failure to notify the presiding administrative law judge within ten days
will deprive you of a change in the place of the hearing.

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 and pay his or her costs. The
interpreter must be certified in accordance with Sections 11435.30 and 11435.55 of the Government Code.

DEPARTMENT OF REAL ESTATE

Dated: March 16, 1998

By E. J. W.

Counsel

cc: First & LA Realty Corp.
Robert La Vern Conlee
Sacto

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RE 501 (Rev. 8/97)

kw Ronald B. Levine, Esq.

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ELLIOTT MAC LENNAN, Counsel
State Bar # 66674
Department of Real Estate
107 South Broadway, Room 8107
Los Angeles, California 90012

Telephone (213) 897-3937

FILED
DEC 31 1997
DEPARTMENT OF REAL ESTATE

By K. Muehlholt

DEPARTMENT OF REAL ESTATE
STATE OF CALIFORNIA

* * * * *

In the Matter of the Accusation of)
FIRST & LA REALTY CORPORATION;)
and, ROBERT LA VERN CONLEE,)
individually and as designated)
officer of First & LA)
Realty Corporation,)

Respondents.)
_____)

No. H- 27484 LA
A C C U S A T I O N

The Complainant, Thomas McCrady, a Deputy Real Estate
Commissioner of the State of California, acting in his official
capacity as a Deputy Real Estate Commissioner of the State of
California, filed this accusation against FIRST & LA REALTY
CORPORATION dba Century 21 Hilltop - the Real Estate Store; and,
ROBERT LA VERN CONLEE, individually and as designated officer of
First & LA Realty Corporation, is informed and alleges as follows:

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I

FIRST & LA REALTY CORPORATION (FLA) and ROBERT LA VERN CONLEE (CONLEE), sometimes collectively referred to as Respondents, are presently licensed and/or have license rights under the Real Estate Law (Part 1 of Division 4 of the California Business and Professions Code).

II

All references to the "Code" are to the California Business and Professions Code and all references to "Regulations" are to Title 10, Chapter 6, California Code of Regulations.

III

At all times mentioned, FLA was licensed by the Department of Real Estate of the State of California (Department) as a corporate real estate broker by and through CONLEE as designated officer. FLA was first licensed by the Department on October 12, 1994.

IV

At all times mentioned, CONLEE was licensed by the Department as designated officer of FLA to qualify FLA and to act for FLA as a real estate broker and, as provided by Section 10159.2 of the Code, was responsible for the supervision and control of the activities conducted on behalf of FLA by its officers, managers and employees as necessary to secure full compliance with the provisions of the Real Estate Law including the supervision of the salespersons licensed to the corporation in the performance of acts for which a real estate license is required.

V

Whenever reference is made in an allegation in the accusation to an act or omission of FLA such allegation shall be deemed to mean that the officers, directors, managers, employees, agents and real estate licensees employed by or associated with FLA, including CONLEE, committed such act or omission while engaged in the furtherance of the business or operation of FLA and while acting within the course and scope of its corporate authority, agency and employment.

VI

At all times mentioned, FLA and CONLEE were acting as the agent or employee of the other and within the course and scope of such agency or employment.

VII

At all times mentioned, in the City of Simi Valley, Los Angeles County, Respondents FLA and CONLEE acted as real estate brokers, within the meaning of Section 10131(a) of the Code in that they operated a residential real estate resale business with the public wherein, on behalf of others and for compensation or in expectation of compensation, Respondents, 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. In addition, Respondents conducted broker controlled escrows under the exemption set forth in Section 17006(a)(4) of the California Financial Code.

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VIII

On September 26, 1997, the Department completed a field audit examination of the books and records pertaining to the activities of FLA described in Paragraph VII. The audit examination covered a period of time beginning on May 1, 1996, and ending on July 31, 1997, which revealed violations of the Code and the Regulations as set forth in the following paragraphs.

IX

In connection with the aforesaid real estate activities described in Paragraph VII, FLA and CONLEE, accepted or received funds in trust (trust funds) from or on behalf of actual or prospective buyers and sellers and thereafter made disbursements of such funds. Respondents maintained the following trust account into which they deposited certain of these funds:

"1st & L A Realty Corporation DBA C-21 Hilltop Escrow
No. 001-036939"
First Western Bank
475 Los Angeles Ave..
Simi Valley, CA 93005

X

With respect to the trust funds referred to in Paragraph IX, FLA and CONLEE:

(a) Failed to maintain the trust account in the name of the broker as trustee at a bank or other financial institution, as required by Regulation 2832 and 2950(d);

(b) Failed to perform an accurate monthly reconciliation of the balance of all separate beneficiary or transaction records maintained pursuant to Regulation 2831.1 with



1 the record of all trust funds received and disbursed by the trust
2 account, as required by Regulation 2831.2 and 2950(d);

3 (c) Commingled FLA's' funds with trust funds, by
4 failing to disburse all broker owned funds in the trust account
5 within twenty-five (25) days of deposit with respect to sales
6 commissions in the form of promotional incentives for the
7 Preferred Client Club, in violation of Section 10176(e) and
8 Regulation 2835;

9 (d) Commingled FLA's' funds with trust funds, by
10 failing to disburse all broker owned funds in the trust account
11 within twenty-five (25) days of deposit with respect to fee
12 subsidiary ledgers Fee 2 account (notary fees) and Fee 3 account
13 (miscellaneous escrow fees), in violation of Section 10176(e) and
14 Regulation 2835;

15 (e) Commingled FLA's' funds with trust funds, by using
16 trust funds to pay business expenses, in violation of Section
17 10176(e) and Regulation 2835; and

18 (f) Permitted unlicensed persons J. Roberts and Nancy
19 Houston, who were not bonded, to be authorized signatories on the
20 trust account, in violation of Section 2834 of the Regulations.

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XI

The conduct of Respondents FLA and CONLEE, described in Paragraph X, violated the Code and the Regulations as set forth:

PARAGRAPH

PROVISIONS VIOLATED

X(a) Section 10145 & 10159.2 of the Code, and
Section 2832 of the Regulations

X(b) Section 10145 & 10159.2 of the Code, and
Section 2831.2 of the Regulations

X(c) Section 10176(e) of the Code, and
Section 2835 of the Regulations

X(d) Section 10176(e) of the Code, and
Section 2835 of the Regulations

X(e) Section 10176(e) of the Code, and
Section 2835 of the Regulations

X(f) Section 10145 & 10159.2 of the Code, and
Section 2834 of the Regulations

Each of the foregoing violations separately constitutes cause for the suspension or revocation of the real estate licenses and license rights of Respondents FLA and CONLEE under the provisions of Section 10177(d) of the Code.

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XII

The audit examination further revealed that Respondent FLA used the fictitious names of "Century 21 Hilltop Wood Ranch, Century 21 Hilltop WD and Century 21 Hilltop Realtors" to conduct licensed activities on behalf of FLA without holding a license bearing these fictitious business names. The conduct of Respondent FLA, in failing to obtain licenses for use of the aforesaid names, is in violation of Regulation 2731 and is cause to suspend or revoke Respondent's real estate license and license rights under Section 10177(d) of the Code.

XIII

The conduct of Respondent FLA in failing to obtain a license for the unlicensed branch office located at 5754 Country Club Drive, Simi Valley, California operating under the unlicensed fictitious business name of Century 21 Wood Ranch to conduct its residential resale business, is in violation of Section 10163 of the Code and is cause to suspend or revoke Respondent FLA's real estate license and license rights under Section 10177(d) of the Code.

XIV

The investigative audit also revealed that Respondent FLA's escrow instructions for its escrow operation failed to contain a statement which included the name of the licensee and the State of California department issuing the license or authority under which FLA operated said escrow company. FLA's name and the Department of Real Estate were not disclosed on the Lynch, Bjordahl, Graney and Cohen sales escrow instructions. This



1 conduct constitutes a violation of Section 17403.4 of the
2 California Financial Code and is cause to suspend or revoke
3 Respondent's real estate license and license rights under Sections
4 10177(d) and 10177(f).

5 XV

6 The audit revealed that Respondent FLA failed to advise
7 all parties to its escrow operation of its ownership of said
8 escrow company, in violation of Regulation 2950(h). FLA's name
9 and the Department of Real Estate were not disclosed on the Lynch,
10 Bjordahl, Graney and Cohen sales escrow instructions. Said
11 conduct is cause to suspend or revoke Respondent's licenses and
12 license rights under Section 10177(d) of the Code.

13 XVI

14 The overall conduct of Respondents FLA and CONLEE in
15 violating Sections 10145, 10163 and 10176(e) of the Code and
16 Regulations Sections 2731, 2831.2, 2832, 2834, 2835, 2959(d) and
17 2959(h), as described in Paragraphs VII through XV above,
18 constitutes a failure to supervise, negligence or incompetence.
19 This conduct and violation are cause for the suspension or
20 revocation of the real estate license and license rights of
21 Respondents under the provisions of Sections 10177(g) and 10177(h)
22 of the Code.

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1 WHEREFORE, Complainant prays that a hearing be conducted
2 on the allegations of this Accusation and that upon proof thereof,
3 a decision be rendered imposing disciplinary action against all
4 licenses and license rights of Respondents against FIRST & LA
5 REALTY CORPORATION and, ROBERT LA VERN CONLEE, individually and as
6 designated officer of First & LA Realty Corporation, under the
7 Real Estate Law (Part 1 of Division 4 of the Business and
8 Professions Code) and for such other and further relief as may be
9 proper under other applicable provisions of law.

10 Dated at Los Angeles, California
11 this 31st day of December, 1997.
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13 THOMAS MC CRADY
14 Deputy Real Estate Commissioner

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24 cc Robert La Vern Conlee, D.O.
25 c/o First LA Realty Corporation
26 Sacto
27 RW

