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**FILED**  
DEC 21 2000  
DEPARTMENT OF REAL ESTATE  
By *[Signature]*

DEPARTMENT OF REAL ESTATE  
STATE OF CALIFORNIA

\* \* \* \* \*

In the Matter of the Accusation of ) H-28525 LA  
) L-2000050287  
UNIQUE FUNDING, INC., a California )  
corporate broker and JAMES C., ) STIPULATION AND AGREEMENT  
SHENOUDA, individually, dba Unique )  
Realty, and as designated officer )  
of Unique Funding, Inc. and of )  
Sweet Home Realty, Inc., )  
)  
Respondents. )

It is hereby stipulated by and between JAMES C. SHENOUDA (referred to as Respondent), acting by and through Frank M. Buda, Esq. and the Complainant, acting by and through Sean Crahan, Counsel for the Department of Real Estate, as follows for the purpose of settling and disposing of the Accusation filed on May 1, 2000, in this matter:

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

1 submitted solely on the basis of the provisions of this  
2 Stipulation And Agreement (hereafter Stipulation).

3           2. Respondent has received, read and understands the  
4 Statement to Respondent, the Discovery Provisions of the APA and  
5 the Accusation, filed by the Department of Real Estate in this  
6 proceeding.

7           3. On May 10, 2000, Respondent filed a Notice of  
8 Defense pursuant to Section 11506 of the Government Code for the  
9 purpose of requesting a hearing on the allegations in the  
10 Accusation. Respondent hereby freely and voluntarily withdraws  
11 said Notice of Defense. Respondent acknowledges that he  
12 understands that by withdrawing said Notice of Defense, he will  
13 thereby waive his right to require the Commissioner to prove the  
14 allegations in the Accusation at a contested hearing held in  
15 accordance with the provisions of the APA and that he will waive  
16 other rights afforded to him in connection with the hearing such  
17 as the right to present evidence in defense of the allegations in  
18 the Accusation and the right to cross-examine witnesses.

19           4. This Stipulation and Agreement relates to the  
20 factual allegations contained in paragraphs one (1) through seven  
21 (7) in the Accusation filed in this proceeding. Respondent  
22 chooses not to contest these factual allegations and to remain  
23 silent and understands that, as a result thereof, these factual  
24 allegations, without being admitted or denied, will serve as a  
25 basis for the discipline stipulated to herein. This Stipulation  
26 and Agreement and the findings based on Respondent's decision not  
27 to contest the Accusation is hereby expressly limited to this

1 proceeding and made for the sole purpose of reaching an agreed  
2 disposition of this proceeding, only. Respondent's decision not  
3 to contest the factual allegations is made solely for the purpose  
4 of effectuating this Stipulation and is intended by Complainant  
5 and Respondent to be non-binding upon him in any actions against  
6 Respondent by third parties and shall not be deemed, used, or  
7 accepted as an acknowledgment or admission. The Real Estate  
8 Commissioner shall not be required to provide further evidence to  
9 prove such allegations.

10           5. It is understood by the parties that the Real  
11 Estate Commissioner may adopt the Stipulation And Agreement as  
12 her Decision in this matter, thereby imposing the penalty and  
13 sanctions on Respondent's real estate licenses and/or license  
14 rights as set forth in the below Order. In the event that the  
15 Commissioner in her discretion does not adopt the Stipulation And  
16 Agreement, it shall be void and of no effect, and Respondent  
17 shall retain the right to a hearing and proceeding on the  
18 Accusation under all the provisions of the APA and shall not be  
19 bound by any stipulation or waiver made herein.

20           6. The Order or any subsequent Order of the Real  
21 Estate Commissioner made pursuant to this Stipulation And  
22 Agreement shall not constitute an estoppel, merger or bar to any  
23 further administrative or civil proceedings by the Department of  
24 Real Estate with respect to any matters which were not  
25 specifically alleged to be causes for accusation in this  
26 proceeding.

27

1 DETERMINATION OF ISSUES

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

6 The conduct or omissions of Respondent JAMES C.  
7 SHENOUDA, as set forth in paragraphs one (1) through seven (7) in  
8 the Accusation constitute cause to suspend or revoke his real  
9 estate broker license and/or license rights under the provisions  
10 of Code Sections 10176(e) and 10177(d) for violations of Code  
11 Sections 10145, 10159.2, 10159.5, 10161.8, 10234 and 10240 and  
12 Regulations 2715, 2731, 2752, 2831.1, and 2832.

13 ORDER

14 WHEREFORE, THE FOLLOWING ORDER is hereby made:

15 All licenses and license rights of Respondent JAMES C.  
16 SHENOUDA under Part 1 of Division 4 of the Business and  
17 Professions Code are suspended for a period of ninety (90) days  
18 from the effective date of this Order; provided;

19 1. Prior to the effective date of this Order,  
20 Respondent SHENOUDA shall pay \$2,024.60 to the Department for the  
21 costs of the audit L-990001 that led to the filing of the  
22 Accusation herein.

23 2. Respondent SHENOUDA's real estate license shall be  
24 suspended for forty-five (45) days.

25 3. The last forty-five (45) days of the ninety (90)  
26 day suspension shall be stayed for two (2) years upon the  
27 following terms and conditions:

1 (a) Respondent JAMES C. SHENOUDA shall obey all  
2 laws, rules and regulations governing the rights, duties and  
3 responsibilities of a real estate licensee in the State of  
4 California;

5 (b) That no final subsequent determination be  
6 made, after hearing or upon stipulation, that cause for  
7 disciplinary action occurred within two (2) years from the  
8 effective date of this Order;

9 4. If respondent (1), pays the cost of audit L-990001  
10 and (2), if no further cause for disciplinary action against the  
11 real estate license of Respondent, as finally determined after  
12 hearing or stipulation, occurs within two (2) years from the  
13 effective date of this Order, the stay of the second forty-five  
14 (45) days of the ninety (90) day suspension shall become  
15 permanent.

16 \* \* \* \* \*

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

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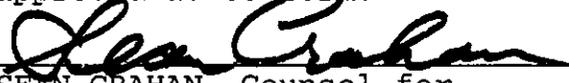
DATED: 10/11/00

  
JAMES C. SHENOUDA, Respondent.

DATED: 10-11-00

  
FRANK M. BUDA, ESQ. Counsel for  
James C. Shenouda, Respondent,  
approved as to form.

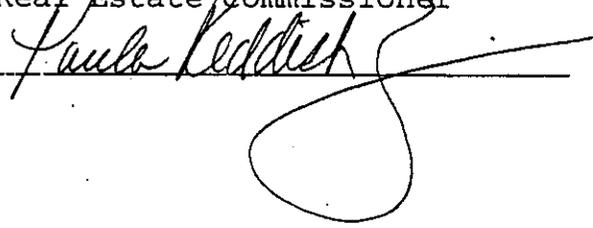
DATED: 10-11-00

  
SEAN CRAHAN, Counsel for  
Complainant.

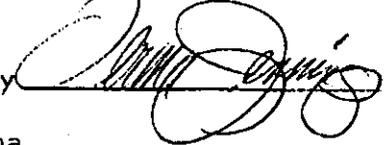
\* \* \* \* \*

The foregoing Stipulation And Agreement In Settlement  
is hereby adopted as my Decision as to Respondent JAMES C.  
SHENOUDA and shall become effective at 12 o'clock noon on  
January 10, 2001

IT IS SO ORDERED November 15, 2000.

PAULA REDDISH ZINNEMANN  
Real Estate Commissioner  


**FILED**  
DEC 21 2000  
DEPARTMENT OF REAL ESTATE

By 

Pro Forma

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DEPARTMENT OF REAL ESTATE  
STATE OF CALIFORNIA

\* \* \*

In the Matter of the Accusation of ) H-28525 LA  
) L-2000050287  
UNIQUE FUNDING, INC., a California )  
corporate broker and JAMES C., )  
SHENOUDA, individually, dba Unique )  
Realty, and as designated officer )  
of Unique Funding, Inc. and of )  
Sweet Home Realty, Inc., )  
)  
Respondents. )

ORDER ACCEPTING VOLUNTARY SURRENDER OF REAL ESTATE LICENSE

On May 1, 2000, an Accusation was filed in this matter against Respondent UNIQUE FUNDING, INC., et. al.

On October 6, 2000, Respondent UNIQUE FUNDING, INC petitioned the Commissioner to voluntarily surrender its corporate real estate broker license and license rights pursuant to Section 10100.2 of the Business and Professions Code.

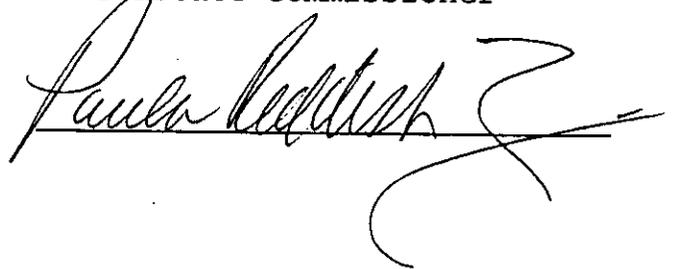
IT IS HEREBY ORDERED that Respondent UNIQUE FUNDING, INC.'s petition for voluntary surrender of its real estate broker license and all license rights appurtenant thereto is accepted

1 as of the effective date of this Order as set forth below, based  
2 upon the understanding and agreement expressed in Respondent's  
3 Declaration dated October 11, 2000 (attached as Exhibit "A"  
4 hereto).

5                   This Order shall become effective at 12 o'clock noon on  
6 January 10, 2001.

7  
8 DATED: November 15, 2000.

9  
10 PAULA REDDISH ZINNEMANN  
11 Real Estate Commissioner

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1 320 West 4th Street, Suite 350  
2 Los Angeles, CA 90013-1105  
3 California Bar #49351  
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7  
8 (213) 576-6982 General

8 DEPARTMENT OF REAL ESTATE

9 STATE OF CALIFORNIA

10 \* \* \*

11 In the Matter of the Accusation of ) H-28525 LA  
12 UNIQUE FUNDING, INC., a California ) L-2000050287  
13 corporate broker and JAMES C., )  
14 SHENOUDA, individually, dba Unique )  
15 Realty, and as designated officer )  
16 of Unique Funding, Inc. and of )  
17 Sweet Home Realty, Inc., )  
18 Respondents. )

17 DECLARATION

18 My name is JAMES C. SHENOUDA.

19 I am President of UNIQUE FUNDING, INC. and have  
20 authority to surrender the real estate license of UNIQUE FUNDING,  
21 INC. UNIQUE FUNDING, INC. is represented by Frank M. Buda, Esq.  
22 of the Law Offices of Frank M. Buda.

23 Pursuant to Business and Professions Code Section  
24 10100.2, I wish to voluntarily surrender the corporate real  
25 estate broker licenses and license rights, issued by the  
26 Department.

27

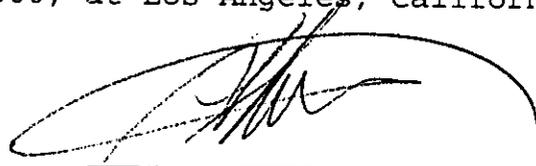
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I, on behalf of UNIQUE FUNDING, INC., understand that by so voluntarily surrendering its real estate licenses and license rights, we agree to the following:

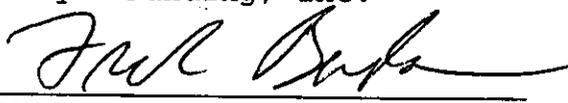
The filing of a petition by UNIQUE FUNDING, INC. shall be deemed to be an understanding and agreement by us that upon acceptance by the Commissioner, as evidenced by an appropriate order, all affidavits and all relevant evidence obtained in the investigation prior to the acceptance and all allegations contained in the Accusation filed in Department of Real Estate Case No. H-28525 LA may be considered by the Department to be true and correct for the purpose of deciding whether or not to grant reinstatement of UNIQUE FUNDING, INC.'s license.

I declare under penalty of perjury under the laws of the State of California that the above is true and correct.

DATED: October 11, 2000, at Los Angeles, California.



UNIQUE FUNDING, INC.  
by James C. Shenouda,  
President of  
Unique Funding, Inc.



FRANK M. BUDA, ESQ.  
Counsel for Unique Funding,  
Inc., approved as to form.

*Shenouda*

BEFORE THE DEPARTMENT OF REAL ESTATE  
STATE OF CALIFORNIA

\* \* \* \*

**FILED**  
MAY 30 2000  
DEPARTMENT OF REAL ESTATE

In the Matter of the Accusation of )  
 )  
UNIQUE FUNDING, INC., et al., )  
 )  
Respondents. )

Case No. H-28525 LA  
OAH No. L-2000050287

By 

**NOTICE OF HEARING ON ACCUSATION**

To the above-named Respondents:

You are hereby notified that a hearing will be held before the Department of Real Estate at Office of Administrative Hearings, 320 West Fourth Street, Suite 630, Los Angeles, California, on **October 10, 11 and 12, 2000**, 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.

Dated: May 30, 2000.

cc: Unique Funding Inc.  
James C. Shenouda  
Frank M. Buda, Esq.  
Danio Fajardo  
Vaughn Weaver  
Sacto.  
OAH

DEPARTMENT OF REAL ESTATE

By:   
SEAN CRAHAN, Counsel

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Sean Crahan, Counsel  
Department of Real Estate  
320 West 4th Street, Suite 350  
Los Angeles, CA 90013  
California Bar #49351

(213) 576-6982 General  
(213) 576-6907 Direct

FILED  
MAY - 1 2000  
DEPARTMENT OF REAL ESTATE

By *[Signature]*

DEPARTMENT OF REAL ESTATE  
STATE OF CALIFORNIA

\* \* \* \* \*

In the Matter of the Accusation of )	No. H-28525 LA
UNIQUE FUNDING, INC., a California )	
corporate broker and JAMES C. )	<u>A C C U S A T I O N</u>
SHENOUDA, individually, dba Unique )	
Realty, and as designated officer )	
of Unique Funding, Inc., and of )	
Sweet Home Realty, Inc., )	
Respondents. )	

The Complainant, Thomas Mc Crady, a Deputy Real Estate Commissioner of the State of California for cause of accusation against UNIQUE FUNDING, INC., a California corporate broker and JAMES C. SHENOUDA, individually, doing business as Unique Realty and as designated officer of Unique Funding, Inc. and of Sweet Home Realty, Inc., alleges as follows:

1.

The Complainant, Thomas Mc Crady, a Deputy Real Estate Commissioner, brings this accusation in his official capacity.

2.

1  
2 UNIQUE FUNDING, INC. (hereafter Respondent UFI) is  
3 presently licensed and/or has license rights under the Real Estate  
4 Law, Part 1 of Division 4 of the California Business and  
5 Professions Code (hereafter cited as the Code).

6 (a) At all times herein mentioned, Respondent UFI was  
7 licensed by the Department of Real Estate of the State of  
8 California (hereafter the Department) as a corporate real estate  
9 broker.

10 (b) At no time herein mentioned was Respondent UFI  
11 authorized to do business as Unique Funding.

12 3.

13 JAMES C. SHENOUDA (hereafter Respondent SHENOUDA) is  
14 presently licensed and/or has license rights under the Real Estate  
15 Law.

16 (a) At all times herein mentioned, Respondent SHENOUDA  
17 was licensed by the Department as a real estate broker,  
18 individually, doing business as Unique Realty and as designated  
19 officer of Unique Funding, Inc. and of Sweet Home Realty, Inc.,

20 (b) Pursuant to Code Section 10159.2, Respondent  
21 SHENOUDA was responsible for the supervision of the officers,  
22 agents and employees of Respondent UFI for which a real estate  
23 license was required.

24 4.

25 (a) At all times herein mentioned, Respondent UFI was  
26 engaged in the mortgage loan brokerage business, as defined by Code  
27 Section 10131(d) in that Respondent UFI, for or in expectation of



1 compensation, solicited and negotiated with borrowers for loans  
2 from third party lenders secured by real property (secured loans).  
3 To complete those loans which it negotiated, Respondent UFI  
4 conducted escrows in that Respondent UFI received funds from  
5 lenders and delivered the funds to borrowers and received from  
6 borrowers promissory notes and trust deeds and assigned them to the  
7 lenders (hereafter escrows).

8 (b) While Respondent UFI represented itself as the  
9 "lender" in U.S. Department of Housing and Urban Development (HUD)  
10 Title I loans to borrowers, Respondent UFI did not fund said loans  
11 with its own funds but, rather, funded said loans from funds  
12 delivered by the lenders. Thus, Respondent UFI was acting as a de-  
13 facto broker.

14 5.

15 Between on or about July 2 through July 23, 1999,  
16 auditors from the Department examined the books and records of  
17 Respondent UFI covering a period of time from January 1, 1998  
18 through May 31, 1999 (hereafter the "audit period"). The  
19 examination revealed that Respondent UFI, during the audit period,  
20 violated the following Code Sections and Regulations from Title 10,  
21 Chapter 6, California Code of Regulations (hereafter Regulations):

22 (a) From approximately June, 1998 through May, 1999,  
23 Respondent UFI received approximately \$505,000 in trust from  
24 lenders on behalf of borrowers and deposited them in Respondent  
25 UFI's general account (hereafter GA), and not into an account  
26 designated as a trust account, in violation of Code Section 10145  
27 and Regulation 2832.



1 (b) Respondent UFI's general account was used for  
2 Respondent UFI's business activities. Respondent UFI commingled  
3 trust funds with its own funds or property.

4 (c) Respondent UFI did not maintain separate records for  
5 borrower's trust funds in violation of Regulation 2831.1. There  
6 were no separate records for trust funds belonging to borrowers  
7 Ibarra, Gaytan, Bennett, Gonzales, Nunez, Olivarez, Lopez,  
8 Rodriguez and Mc Caskill.

9 (d) From on and after January 21, 1999, Respondent UFI  
10 recorded trust deeds with Respondent UFI as the beneficiary.  
11 Respondent UFI was not the lender on the loans but acted as a de-  
12 facto broker. Assignments of trust deeds were recorded  
13 consecutively to the lenders. Respondents violated Code Section  
14 10234 which requires the broker who negotiates the loan to record  
15 the trust deed in favor of the lender.

16 (e) Respondent UFI did not provide borrowers with a  
17 Mortgage Loan Disclosure Statement (Borrower) and/or failed to  
18 maintain for three years copies thereof, in violation of Code  
19 Section 10240 and Regulation 2840. There were no Mortgage Loan  
20 Disclosure Statements found in the loan files for Ibarra, Gaytan,  
21 Bennett, Gonzales, Nunez, Olivarez, Lopez, Rodriguez and Mc  
22 Caskill.

23 (f) Respondent UFI received a premiums over and above  
24 the principal amounts of the loans, from the lenders. Respondent  
25 UFI failed to disclose this compensation to the borrowers, as set  
26 forth in the attached Schedule of Funds Received by UFI But Not  
27 Disclosed To Borrower.



1 (g) Respondent UFI did not notify the Department of the  
2 change in its main office address, by the next business day, in  
3 violation of Regulation 2715. On or about May 1, 1999, Respondent  
4 UFI moved its offices from 4454 Van Nuys Blvd. #105, Sherman Oaks,  
5 California, to 4348 Van Nuys Blvd. #203, Sherman Oaks, California.  
6 According to the Department's licensing records as of July 6, 1999,  
7 Respondent UFI's main office address was 4454 Van Nuys Blvd. #105,  
8 Sherman Oaks, California, as previously updated on November 10,  
9 1998.

10 (h) During the audit period, Respondent UFI used  
11 the fictitious business name of "Unique Funding", without the  
12 suffix "Inc." on various documents found in the loan files  
13 including but not limited to the files for borrowers Ibarra,  
14 Gaytan, Bennett, Gonzales, Nunez, Olivarez, Lopez, Rodriguez and Mc  
15 Caskill. In so doing, Respondent UFI was using a fictitious  
16 business name not contained in its articles of incorporation.  
17 Respondent UFI did not have a real estate license bearing that  
18 fictitious business name, in violation of Code Section 10159.5 and  
19 Regulation 2731.

20 (i) Respondent UFI did not notify the Department within  
21 five (5) days of the re-employment of salesperson Elvina K.  
22 Shenouda, after UFI renewed their Corporate Broker License, in  
23 violation of Code Section 10161.8 and Regulation 2752. Respondent  
24 UFI had a break in licensing from March 10, 1998 until August 24,  
25 1998. Elvina K. Shenouda was licensed by the Department as a  
26 salesperson, with license (1153374) expiring on January 26, 2001.  
27 Elvina K. Shenouda had no current employing broker as of the close

1 of the audit period. Elvina K. Shenouda was licensed under UFI  
2 from November 22, 1993 through March 10, 1998, when UFI had a break  
3 in licensing.

4 6.

5 In the course of soliciting borrowers for loans secured  
6 by real property, Respondent UFI and SHENOUDA represented that  
7 Respondent UFI was licensed as a Consumer Finance Lender. In fact,  
8 Respondent UFI was not licensed by the California Department of  
9 Corporations as a Consumer Finance Lender.

10 7.

11 Respondent SHENOUDA knew or should have known that the  
12 above violations occurred or were occurring. Respondent SHENOUDA  
13 failed to exercise reasonable supervision over the activities of  
14 officers and employees of Respondent UFI for which a real estate  
15 license was required so as to prevent those violations.

16 8.

17 The conduct or omissions of Respondent UFI as set forth  
18 above subject its real estate license and license rights to  
19 suspension or revocation under the following Code Sections:

20 (a) Code Section 10176(a) [substantial  
21 misrepresentation] or 10176(i), [fraud or dishonest dealing] for  
22 failing to disclose to the borrowers the receipt of premiums or  
23 discounts from the lenders, as set forth in paragraph 5(f), and  
24 misrepresenting that Respondent UFI was licensed as a consumer  
25 finance Lender, as set forth in paragraph 6, above.

26 (b) Code Section 10176(e) for commingling, as set forth  
27 in paragraph 5(b), above.



1 (c) Code Section 10177(d) for willful violations of the  
2 following Code Sections and Regulations:

3 (i) Code Section 10145 and Regulation 2832 for  
4 failure to deposit trust funds into a trust account, as set forth  
5 in paragraph 5(a), above.

6 (ii) Regulation 2831.1 for failure to maintain  
7 separate records for borrowers' trust funds, as set forth in  
8 paragraph 5(c), above.

9 (iii) Code Section 10234 for recording trust deeds  
10 with Respondent UFI as the beneficiary, when Respondent UFI was not  
11 the lender on the loans, as set forth in paragraph 5(d), above.

12 (iv) Code Section 10240 and Regulation 2840 for  
13 failing to provide borrowers with Mortgage Loan Disclosure  
14 Statement (Borrower) and/or failing to maintain for three years  
15 copies thereof, as set forth in paragraph 5(e), above.

16 (v) Regulation 2715 for failing to notify the  
17 Department of the change in their main office address, by the next  
18 business day, as set forth in paragraph 5(g), above.

19 (vi) Code Section 10159.5 and Regulation 2731 for  
20 conducting business under an unlicensed fictitious business name,  
21 as set forth in paragraph 5(h) above.

22 (vii) Code Section 10161.8 and Regulation 2752 for  
23 failing to notify the Department within five (5) days of the re-  
24 employment of salesperson Elvina K. Shenouda, as set forth in  
25 paragraph 5(i) above.

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The conduct or omissions of Respondent SHENOUDA as set forth above subject his real estate license and license rights to suspension or revocation under the following Code Sections:

(a) Code Section 10176(a) [substantial misrepresentation] or 10176(i), [fraud or dishonest dealing] for failing to disclose to the borrowers the receipt of a premium or discount from the lenders, as set forth in paragraph 5(f), and misrepresenting that Respondent UFI was licensed as a consumer finance Lender, as set forth in paragraph 6, above.

(b) Code Section 10177(d) for willful violations of the following Code Sections and Regulations:

(i) Code Section 10145 and Regulation 2832 for failure to deposit trust funds into a trust account, as set forth in paragraph 5(a), above.

(ii) Regulation 2831.1 for failure to maintain separate records for borrower's trust funds, as set forth in paragraph 5(c), above.

(iii) Code Section 10234 for recording trust deeds with Respondent UFI as the beneficiary, when Respondent UFI was not the lender on the loans, as set forth in paragraph 5(d), above.

(iv) Code Section 10240 and Regulation 2840 for failing to provide borrowers with a Mortgage Loan Disclosure Statement (Borrower) and/or failing to maintain for three years copies thereof, as set forth in paragraph 5(e), above.

1 (v) Regulation 2715 for failing to notify the  
2 Department of the change in their main office address, by the next  
3 business day, as set forth in paragraph 5(g), above.

4 (vi) Code Section 10159.5 and Regulation 2731 for  
5 conducting business under an unlicensed fictitious business name,  
6 as set forth in paragraph 5(h) above.

7 (vii) Code Section 10161.8 and Regulation 2752 for  
8 failing to notify the Department within five (5) days of the re-  
9 employment of salesperson Elvina K. Shenouda, as set forth in  
10 paragraph 5(i) above.

11 (viii) Code Section 10159.2, [failure to supervise]  
12 as set forth in paragraph 7, above.

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