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1 Department of Real Estate
2 320 West 4th Street, Suite 350
3 Los Angeles, CA 90013-1105

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5 (213) 576-6905
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FILED
SEP 15 2000
DEPARTMENT OF REAL ESTATE

By 

8 DEPARTMENT OF REAL ESTATE

9 STATE OF CALIFORNIA

10 * * * *

11 To:) No. H-28749 LA
12)
13 SAM AND GILDA KEENEY.) ORDER TO DESIST
dba S&G Management) AND REFRAIN

14 The Real Estate Commissioner of the State of California
15 ("Commissioner") has caused an investigation to be conducted of
16 your activities as described herein, and based upon the findings
17 of that investigation, is of the opinion that you have violated
18 Section 10130 of the California Business and Professions Code
19 (hereinafter Code).

20 I

21 At no time mentioned were you, SAM AND GILDA KEENEY,
22 dba S&G Management, licensed by the Department of Real Estate of
23 the State of California ("Department") as real estate brokers or
24 licensed as real estate salespersons and employed by a real
25 estate broker.
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II

On or about March 11, 1998, you negotiated a lease on real property known as 11818 Darlington Avenue, #101, Los Angeles, California, to Suzanne Volk on behalf of the owner of said property, Carol Moss-Spivak. Thereafter, from March 11, 1998, to on or about March 10, 1999, you collected rent from the tenant. This was done by you for or in expectation of a compensation.

III

Your conduct, as described in Paragraph II, is that of real estate brokers as set forth in Section 10131(b) of the Code.

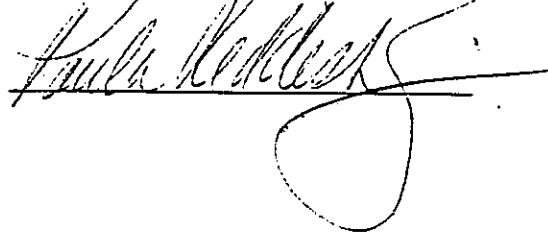
IV

You violated Section 10130 of the Code by acting in the capacity of brokers when neither of you were licensed as a real estate broker or licensed as a real estate salesperson and employed by a real estate broker.

NOW, THEREFORE, YOU, SAM AND GILDA KEENEY dba S&G Management and any other fictitious business name, ARE ORDERED TO DESIST AND REFRAIN from performing any and all acts requiring a real estate license in California unless and until such time as you obtain the required license from the Department.

DATED: September 12, 2000

PAULA REDDISH ZINNEMANN
Real Estate Commissioner



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Sam and Gilda Keeney
Dba S&G Management
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Santa Monica, California 90403

