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1 2	ELLIOTT MAC LENNAN, SBN 66674 Department of Real Estate 320 West 4th Street, Ste. 350 Los Angeles, California 90013-1105
3	Telephone: (213) 576-6911 (direct)
5	-or- (213) 576-6982 (office)
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8	DEPARTMENT OF REAL ESTATE
9	STATE OF CALIFORNIA
- 10	* * *
11	In the Matter of the Accusation of) No. H-29290 LA
12	LIMON REALTY INC., doing) <u>AND</u>
13	business as Real Estate) AGREEMENT Investments 2000; and,)
14	FILIBERTO LIMON, individually) and as designated officer of) Limon Realty Inc.
15 16	Respondents.
17	It is hereby stipulated by and between LIMON REALTY
18	INC. and FILIBERTO LIMON, individually and as designated officer
19	of Limon Realty, Inc. (sometimes collectively referred to as
20	"Respondents"), represented by Frank Buda, Esq., and the
21	Complainant, acting by and through Elliott Mac Lennan, Counsel
22	for the Department of Real Estate, as follows for the purpose of
23	settling and disposing of the Accusation filed on November 19,
24	2001, in this matter:
25	1. All issues which were to be contested and all
26	evidence which was to be presented by Complainant and Respondents
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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).

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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.

10 Respondents filed a Notice of Defense pursuant to . 3. 11 Section 11506 of the Government Code for the purpose of 12 requesting a hearing on the allegations in the Accusation. 13 Respondents hereby freely and voluntarily withdraw said Notice of 14 Defense. Respondents acknowledge that they understand that by withdrawing said Notice of Defense they thereby waive their right 15 to require the Commissioner to prove the allegations in the 16 Accusation at a contested hearing held in accordance with the 17 provisions of the APA and that they will waive other rights 18 19 afforded to them in connection with the hearing such as the right 20 to present evidence in their defense of the allegations in the 21 Accusation and the right to cross-examine witnesses.

4. This Stipulation is based on the allegations
contained in the Accusation. In the interest of expedience and
economy, Respondents choose not to contest these allegations, but
to remain silent and understand that, as a result thereof, these
allegations, without being admitted or denied, will serve as a
prima facie basis for the disciplinary action stipulated to

- 2 -

herein. The Real Estate Commissioner shall not be required to provide further evidence to prove said allegations.

5. This Stipulation is based on Respondents decision not to contest the allegations set forth in the Accusation as a result of the agreement negotiated between the parties. This Stipulation is expressly limited to this proceeding and any further proceeding initiated by or brought before the Department of Real Estate based upon the facts and circumstances alleged in the Accusation, and is made for the sole purpose of reaching an agreed disposition of this proceeding without a hearing. The decision of Respondents not to contest the allegations is made solely for the purpose of effectuating this Stipulation. It is the intent and understanding of the parties that this Stipulation shall not be binding or admissible against Respondents in any actions against Respondents by third parties.

16 6. It is understood by the parties that the Real 17 Estate Commissioner may adopt this Stipulation as her Decision in this matter thereby imposing the penalty and sanctions on 18 19 Respondents real estate licenses and license rights as set forth 20 in the "Order" herein below. In the event that the Commissioner, 21 in her discretion, does not adopt the Stipulation, it shall be 22 void and of no effect and Respondents shall retain the right to a 23 hearing and proceeding on the Accusation under the provisions of 24 the APA and shall not be bound by any stipulation or waiver made 25 herein.

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7. The Order or any subsequent Order of the Real Estate Commissioner made pursuant to this Stipulation shall not constitute an estoppel, merger or bar to any further administrative or civil proceedings by the Department of Real Estate with respect to any matters which were not specifically alleged to be causes for Accusation in this proceeding but do constitute a bar, estoppel and merger as to any allegations actually contained in the Accusation against Respondents herein.

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9 8. This Stipulation and the order made pursuant to 10 this Stipulation shall have no collateral estoppel or res 11 judicata effect in any proceeding(s) in which LIMON REALTY INC. 12 and/or FILIBERTO LIMON and the Department are not parties. This Stipulation is made and accepted with the express understanding 13 and agreement that it is for the purpose of settling these 14 15 proceedings only, and is not intended as, nor shall be it be 16 deemed, used, argued, or accepted as an acknowledgement or 17 admission of fact in any other judicial, administrative, or other 18 proceeding in which the Department is not a party.

9. Respondents understand that by agreeing to this Stipulation, Respondents agree to pay, pursuant to Business and Professions Code Section 10148, the cost of the audit (LA 000478 and LA 000098) which led to this disciplinary action. The amount of said cost is \$4,951.32.

10. Respondents have received, read, and understand the "Notice Concerning Costs of Subsequent Audit". Respondents further understand that by agreeing to this Stipulation, the

- 4 -

findings set forth below in the Determination of Issues become final, and the Commissioner may charge Respondents for the cost of any subsequent audits conducted pursuant to Business and Professions Code Section 10148 to determine if the violations have been corrected. The maximum cost of the subsequent audit will not exceed \$4,951.32.

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DETERMINATION OF ISSUES

By reason of the foregoing stipulations, it is stipulated and agreed that the following determination of issues 10 shall be made:

1.

The conduct of LIMON REALTY INC. as described in Paragraph 4, is in violation of Section 10145 of the Business and Professions Code ("Code") and Sections 2831, 2832, 2832.1 and 2950(h), of Title 10, Chapter 6 of the California Code of Regulations and is a basis for the suspension or revocation of Respondent's license pursuant to Sections 10177(d) and/or 10177(g) of the Code.

2.

21 The conduct of FILIBERTO LIMON, as described in 22 Paragraph 4, constitutes a failure to exercise reasonable 23 supervision over the activities of Limon Realty Inc., for which a 24 real estate license is required, in violation of Code Section 25 10159.2 This conduct is a basis for the suspension or revocation 26 of Respondent's broker license pursuant to Code Section 10177(d). 27

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ORDER

WHEREFORE THE FOLLOWING ORDER IS MADE PURSUANT TO THE WRITTEN STIPULATION OF THE PARTIES:

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Τ.

5 All licenses and licensing rights of Respondents 6 LIMON REALTY INC. and FILIBERTO LIMON under the Real Estate Law are suspended for a period of sixty (60) days from the effective date of this Decision; provided, however, that thirty (30) days of said suspension shall be stayed for two (2) years upon the following terms and conditions:

Α. Prior to the effective date of this Decision 12 Respondents provide evidence satisfactory to the Commissioner 13 that the trust fund deficit set forth in Audit Reports LA 000478 14 and LA 000098, in the amount of \$5,497.46, has been cured, 15 including the identity of the source of funds used to cure it; 16 and 17

All licenses and licensing rights of Respondent 18 в. 19 FILIBERTO LIMON are indefinitely suspended unless or until he 20 provides proof satisfactory to the Commissioner, of having taken, 21 within one hundred twenty (120) days prior to this Order or any 22 time after said date, the trust fund accounting and handling 23 course specified in paragraph (3) of subdivision (a) of Business 24 and Professions Code Section 10170.5. Upon satisfaction of this 25 condition, the indefinite suspension shall be stayed for two (2) 26 years.

1. Respondents shall obey all laws, rules and regulations governing the rights, duties and responsibilities of a real estate licensee in the State of California.

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2. That no final subsequent determination be made, after hearing or upon stipulation, that cause for disciplinary action occurred within two (2) years of the effective date of this Decision. Should such determination be made, the Commissioner may, in his discretion, vacate and set aside the stay order and reimpose all or a portion of the stayed suspension. Should no such determination be made, the stay imposed herein shall become permanent.

3. The initial thirty (30) day portion of said sixty (60) day suspension shall commence on the effective date of this Decision; provided, however, that if Respondents petition, said suspension shall be stayed upon condition that:

(a) <u>Pursuant to Section 10175.2 of the Business</u>
and Professions Code, Respondent LIMON REALTY INC. pays a
monetary penalty of one-hundred dollars (\$100) per day totaling
three thousand dollars (\$3,000); and Respondent FILIBERTO LIMON
pays a monetary penalty of one-hundred dollars (\$100) per day
totaling three thousand dollars (\$3,000);

(b) Said payment shall be in the form of a
 cashier's check or certified check made payable to the Recovery
 Account of the Real Estate Fund. Said check must be received
 by the Department prior to the effective date of the Decision

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in this matter.

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1	in this matter.	
2	(c) No further cause for disciplinary action	
. 3	against the real estate license of Respondents occur within two	
4	(2) years from the effective date of the Decision in this matter.	
5	(d) If Respondents fail to pay the monetary	
6	penalty in accordance with the terms and conditions of the	
7	Decision, the Commissioner may, without a hearing, order the	
8	immediate execution of all or any part of the stayed suspension	
9	in which event Respondents shall not be entitled to any repayment	
10	nor credit, prorated or otherwise, for money paid to the	
11	Department under the terms of this Decision.	
12	(e) If Respondents pay the monetary penalty and if	
13	no further cause for disciplinary action against the real estate	
14	licenses of Respondents occur within two (2) years from the	
15	effective date of the Decision, the stay hereby granted shall	
16	become permanent.	
17	II.	
18	Pursuant to Section 10148 of the Business and	
19 20	Professions Code, Respondents shall pay the Commissioner's	
20	reasonable cost for: (a) the audit (Audit Report LA 000478 and	
21	LA 000098) which led to this disciplinary action and (b) a	
22		
	subsequent audit to determine if Respondent LIMON REALTY INC. is	
24	now in compliance with the Real Estate Law. The cost of the	
25	audit which led to this disciplinary action is \$4,951.32. In	
26 27	calculating the amount of the Commissioner's reasonable cost, the	
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Commissioner may use the estimated average hourly salary for all persons performing audits of real estate brokers, and shall include an allocation for travel time to and from the auditor's place of work. Said amount for the prior and subsequent audit shall not exceed \$9,902.64.

Respondents shall pay such cost within 60 days of receiving an invoice from the Commissioner detailing the activities performed during the audit and the amount of time spent performing those activities.

The Commissioner may suspend the license of a Respondent pending a hearing held in accordance with Section 11500, et seq., of the Government Code, if payment is not timely made as provided for herein, or as provided for in a subsequent agreement between the Respondent and the Commissioner. The suspension shall remain in effect until payment is made in full or until a Respondent enters into an agreement satisfactory to the Commissioner to provide for payment, or until a decision providing otherwise is adopted following a hearing held pursuant to this condition.

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DATED:

4-23-04

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ELLIOTT MAC LENNAN, Counsel for the Department of Real Estate

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

Respondents can signify acceptance and approval of the 14 terms and conditions of this Stipulation and Agreement by faxing 15 a copy of its signature page, as actually signed by Respondents, 16 to the Department at the following telephone/fax number: (213) 17 576-6917, Attention: Elliott Mac Lennan. Respondents agree, 18 acknowledge and understand that by electronically sending to the 19 Department a fax copy of Respondents' actual signatures as they 20 appear on the Stipulation and Agreement, that receipt of the 21 faxed copy by the Department shall be as binding on Respondents 22 23 as if the Department had received the original signed Stipulation 24 and Agreement.

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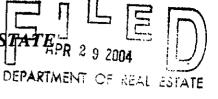
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1 2 DATED: 3 LIMON REALTY INC. FILIBERTO LIMON, BY: 4 Respondent 5 6 DATED: 6/23 FILIBERTO LIMON, individually and 7 as designated officer of Limon 8 Realty Inc. Respondent 9 23. OY DATED: 6 10 FRANK BUDA, Attorney for 11 Respondents 12 13 DATED: L. KEITH OGBURN, Attorney for 14 Respondents 15 16 17 The foregoing Stipulation and Agreement is hereby 18 adopted as my Decision and Order and shall become effective at 12 SEP -7 2004 19 o'clock noon on 20 2004 // IT IS SO ORDERED AUSUST 21 22 JOHN R. LIBERATOR Acting Real Estate Commissioner 23 24 m Rpilento 25 26 27 - 11 -



BEFORE THE DEPARTMENT OF REAL ESTATE 2 9 STATE OF CALIFORNIA



In the Matter of the Accusation of

LIMON REALTY INC., ET AL,

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Case No. H-29290 LA

OAH No. L-2001120477

Respondent

CONTINUED 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 320 W. Fourth Street, Ste. 630, Los Angeles, CA on July 6-8,, 2004, 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 subpenas 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: 227. 20200

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ELLIOTT MAC LENNAN, Counsel

cc: Limon Realty Inc/Filiberto Limon Frank M. Buda, Esq.. Sacto/OAH/LF

RE 501 (Rev. 8/97)



BEFORE THE DEPARTMENT OF REAL ES STATE OF CALIFORNIA

In the Matter of the Accusation of

LIMON REALTY INC., ET AL.,

DEPARTMENT OF REAL ESTATE

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Case No. H-29290 LA

OAH No. L-2001120477

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, 320 West Fourth Street, Ste. 630, Los Angeles, CA on July 2 & 3, 2002, 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 subpenas 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 14, 2002

By <u>e</u>

ELLIOTT MAC LENNAN, Counsel

cc: Limon Realty Inc. Filiberto Lim**on** Frank M. Buda, Esq. /Sacto/OAH/LF

RE 501 (Rev. 8/97)

	ELLIOTT MAC LENNAN, SBN 66674 Department of Real Estate 320 West 4th Street, Ste. 350 Los Angeles, California 90013-1105 Telephone: (213) 576-6911 (direct) -or- (213) 576-6982 (office) DEPARTMENT OF REAL ESTATE DEPARTMENT OF REAL ESTATE
9	STATE OF CALIFORNIA
10) In the Matter of the Accusation of) No. H-29290 LA
12	LIMON REALTY INC., doing
13	business as Real Estate) Investments 2000; and,
14	FILIBERTO LIMON, individually) and as designated officer of
15	Limon Realty Inc.
16	Respondents.
17	The Complainant, Maria Suarez, a Deputy Real Estate
18	Commissioner of the State of California, for cause of Accusation
19	against LIMON REALTY INC. dba Real Estate Investments 2000, and
20 21	FILIBERTO LIMON, individually and as designated officer of LIMON
22	REALTY INC., alleges as follows:
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The Complainant, Maria Suarez, acting in her official 2 capacity as a Deputy Real Estate Commissioner of the State of 3 California makes this Accusation against LIMON REALTY INC. (LRI) 4 and FILIBERTO LIMON (LIMON). 5 2. . 6 All references to the "Code" are to the California 7 Business and Professions Code and all references to "Regulations" 8 are to Title 10, Chapter 6, California Code of Regulations. 9 10 з. LRI and LIMON (hereinafter referred to as Respondents) 11 are presently licensed and/or have license rights under the Real 12 Estate Law (Part 1 of Division 4 of the Business and Professions 13 14 Code). 15 4. 16 At all mentioned times, LIMON was licensed by the 17 Department as designated officer of LRI to qualify it and to act 18 for it as a real estate broker and, as provided by Section 19 10159.2 of the Code, was responsible for the supervision and 20 control of the activities conducted on its behalf by its 21 officers, managers and employees as necessary to secure full 22 compliance with the provisions of the Real Estate Law including 23 the supervision of the salespersons licensed to the corporation 24 in the performance of acts for which a real estate license is 25 LIMON was originally licensed as a real estate required. 26 salesperson on November 22, 1989, and as a real estate broker on 27

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1	November 26, 1996. LRI was originally licensed as a corporate
2	real estate broker on March 22, 2000.
3	5.
4	Whenever reference is made in an allegation in the
· 5	Accusation to an act or omission of LRI such allegation shall be
6	deemed to mean that the officers, directors, managers, employees,
7	agents and real estate licensees employed by or associated with
8	LRI including LIMON committed such act or omission while engaged
9 10	in the furtherance of its business or operation and while acting
10	within the course and scope of its corporate authority, agency
12	and employment.
13	6.
, 14	At all times mentioned, in the City of Downey, Los
15	Angeles County, LIMON acted as a real estate broker, within the
16	meaning of:
17	A. Section 10131(a) of the Code in that it operated a
18	residential resale brokerage dba Real Estate Investments 2000
19	and,
20	B. Conducted broker-controlled escrows through its
21	escrow division under the exemption set forth in Section
22	17006(a)(4) of the California Financial Code for real estate
23	brokers performing escrows incidental to a real estate
24 25	transaction where the broker is a party and where the broker is
25	performing acts for which a real estate license is required.
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1	7.
2	On July 13, 2001, the Department completed an audit
3	examination (Audit Reports LA 000478 & 000098 and
4	exhibits/workpapers attached to said audit report) of the books
· 5	and records of LRI pertaining to residential resale and escrow
6	activities that require a real estate license. The audit
7	examination covered a period of time beginning on January 1, 1999
В	and terminating on March 31, 2001. The audit examination
9	revealed violations of the Code and the Regulations as set forth
_ 10	in the following paragraphs.
11	8.
. 12	At all times mentioned, in connection with the
13	activities described in Paragraph 6, above, LRI accepted or
14	received funds in trust (trust funds) from or on behalf of buyers
15	and sellers and thereafter made disposition of such funds. LRI
16	maintained the following escrow trust account during the audit
17	period into which were deposited certain of these funds at the
18	Imperial Bank, 9920 S. La Cienaga Blvd, 11 th Floor, Inglewood,
19	California:
20 21	"Limon Realty Inc. dba Real Estate Investments 2000 Escrow Trust
21	Acct. Account No. 0031-020-638"
23	(The Escrow Trust Account)
24	/
25	/
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With respect to the trust funds referred to in Paragraph 8, it is alleged that LRI:

9.

Permitted, allowed or caused the disbursement of (a) 4 trust funds from the escrow trust account where the disbursement 5 of funds reduced the total of aggregate funds in the escrow 6 trust account, to an amount which, on March 31, 2001, was 7 \$5,497.46 less than the existing aggregate trust fund liability R 9 of LIMON to every principal who was an owner of said funds, 10. without first obtaining the prior written consent of the owners 11 of said funds, as required by Code Section 10145 and Regulations 12 2832.1, 2950(q) and 2951. The \$5,497.46 deficit was principally 13 caused by negative balance escrows.

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(b) Failed to maintain an adequate control record in the form of a columnar record in chronological order of all trust funds received in the escrow trust account, as required by Code Section 10145 and Regulations 2831, 2950(d) and 2951;

(c) Failed to place funds accepted on behalf of
buyers in the form of earnest money deposits from buyers Otero,
Guevara, and Enriquez, into the hands of the owner of the funds,
into a neutral escrow depository or into a trust fund account in
the name of the broker as trustee at a bank or other financial
institution not later than three business days following receipt
of the funds, as required by Code Section 10145 and Regulation

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• •	2832, in violation of Code Sect:	ion 10145 of the Code and
1	Regulations 2832, 2950(d) and 29	951; and
. –	(d) Failed to advise a	all parties to the escrow
4	operation of LIMON of its owners	ship of said escrow company, as
5	required by Code Section 10145 a	and Regulation 2950(h).
6		10.
7	The conduct of Respond	dent LIMON, described in Paragraph
8	9, above, violated the Code and	the Regulations as set forth
9	below:	
. 10	PARAGRAPH PI	ROVISIONS VIOLATED
11	9(a) Co	ode Section 10145 and
12	Re	egulation 2832.1, 2950(g) and 2951
13		
14	9 (b) Co	ode Section 10145 and
15	Re	egulation 2831, 2950(d) and 2951
16 17		
18	9(c) Co	ode Section 10145 and
19	Re	egulation 2832, 2950(d) and 2951,
20	ar	nd
21		
22	9 (d) Co	ode Section 10145 and
23	Re	egulation 2950(h)
24		
25		ites cause for the suspension or
26		icense and license rights of LIMON
27	under the provisions of Code Sec	ction 10177(d) and/or 10177(g).
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-	11.	
1 2	The overall conduct of Respondent LIMON constitutes a	
2	failure on his part, as officer designated by a corporate broker	
4	licensee, responsible for the supervision and control over the	
5	activities conducted on behalf of LIMON by its officers, managers	
6	and employees as necessary to secure full compliance with the	
7	provisions of the Real Estate Law including the supervision of	
8	the salespersons licensed to the corporation in the performance	
9	of acts for which a real estate license is required. This	
10	conduct is cause for the suspension or revocation of the real	
11	estate license and license rights of LIMON pursuant to the	
12	provisions of Code Sections 10159.2, 10177(h), 10177(d) and/or	•
13	10177(g).	
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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 Respondents
5	LIMON REALTY INC., and LOUIS FILIBERTO LIMON under the Real
6	Estate Law (Part 1 of Division 4 of the Business and Professions
7	Code) and for such other and further relief as may be proper
8	under other applicable provisions of law.
. 9	under ocher appricable provibions of law.
10	Dated at Los Angeles, California
11	this 19th day of November, 2001
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13	Mi to the
14	Alt flatter
15	Deputy Real Estate Ommissioner
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23	cc: Limon Realty Inc.
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25	cc: Filiberto Limon Sacto
26	LF MS Audita
27	Audits

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