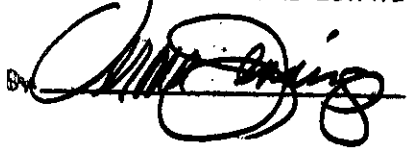


5/20/05  
File

FILED  
JUN 22 2005  
DEPARTMENT OF REAL ESTATE



1  
2  
3  
4  
5  
6  
7  
8  
9  
10  
11  
12  
13  
14  
15  
16  
17  
18  
19  
20  
21  
22  
23  
24  
25  
26  
27

BEFORE THE DEPARTMENT OF REAL ESTATE  
STATE OF CALIFORNIA

\* \* \*

In the Matter of the Accusation of	)	No. H-31235 LA
FIRSTLINE RELOCATION, INC.,	)	L-2004 110 486
	)	
Respondent.	)	

ORDER ACCEPTING VOLUNTARY SURRENDER OF REAL ESTATE LICENSE

On August 27, 2004, an Accusation was filed in this matter against Respondent FIRSTLINE RELOCATION, INC.

On May 17, 2005, Respondent petitioned the Commissioner to voluntarily surrender its corporate real estate broker license pursuant to Section 10100.2 of the Business and Professions Code.

IT IS HEREBY ORDERED that Respondent FIRSTLINE RELOCATION's petition for voluntary surrender of its corporate real estate broker license is accepted as of the effective date of this Order as set forth below, based upon the understanding and agreement expressed in Respondent's Declaration dated May 17, 2005 (attached as Exhibit "A" hereto).

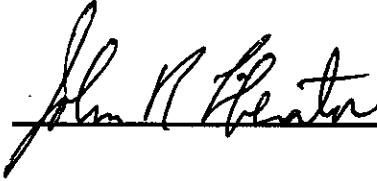
1 Respondent's license certificates, pocket cards and any  
2 branch office license certificates shall be sent to the below  
3 listed address so that they reach the Department on or before the  
4 effective date of this Order:

5 DEPARTMENT OF REAL ESTATE  
6 Attn: Licensing Flag Section  
7 P. O. Box 187000  
8 Sacramento, CA 95818-7000

8 This Order shall become effective at 12 o'clock noon  
9 on July 12, 2005.

10 \_\_\_\_\_  
11 DATED: June 15, 2005

12 JEFF DAVI  
13 Real Estate Commissioner

14   
15 \_\_\_\_\_

16  
17 BY: John R. Liberator  
18 Chief Deputy Commissioner

19  
20  
21  
22  
23  
24  
25  
26  
27

1  
2  
3  
4  
5  
6  
7  
8  
9  
10  
11  
12  
13  
14  
15  
16  
17  
18  
19  
20  
21  
22  
23  
24  
25  
26  
27

BEFORE THE DEPARTMENT OF REAL ESTATE

STATE OF CALIFORNIA

\* \* \*

In the Matter of the Accusation of	)	No. H-31235 LA
FIRSTLINE RELOCATION, INC.,	)	
	)	
	)	
Respondent.	)	

DECLARATION

My name is Todd Christopher Kelly Williams and that I am currently an officer of FIRSTLINE RELOCATION, INC., which is licensed as a real estate broker and/or has license rights with respect to said license. I am authorized and empowered to sign this declaration on behalf of FIRSTLINE RELOCATION, INC. I am acting on behalf of FIRSTLINE RELOCATION, INC. in this matter.

In lieu of proceeding in this matter in accordance with the provisions of the Administrative Procedure Act (Sections 11400 et seq., of the Business and Professions Code) FIRSTLINE RELOCATION, INC. wishes to voluntarily surrender its real estate

1 license issued by the Department of Real Estate ("Department"),  
2 pursuant to Business and Professions Code Section 10100.2.

3 I understand that FIRSTLINE RELOCATION, INC., by so  
4 voluntarily surrendering its license, can only have it reinstated  
5 in accordance with the provisions of Section 11522 of the  
6 Government Code. I also understand that by so voluntarily  
7 surrendering its license, FIRSTLINE RELOCATION, INC. agrees to  
8 the following:

9 The filing of this Declaration shall be deemed as its  
10 petition for voluntary surrender. It shall also be deemed to be  
11 an understanding and agreement by FIRSTLINE RELOCATION, INC.  
12 that, it waives all rights it has to require the Commissioner to  
13 prove the allegations contained in the Accusation filed in this  
14 matter at a hearing held in accordance with the provisions of the  
15 Administrative Procedure Act (Government Code Sections 11400 et  
16 seq.), and that it also waives other rights afforded to it in  
17 connection with the hearing such as the right to discovery, the  
18 right to present evidence in defense of the allegations in the  
19 Accusation and the right to cross-examine witnesses. I further  
20 agree on behalf of FIRSTLINE RELOCATION, INC. that upon  
21 acceptance by the Commissioner, as evidenced by an appropriate  
22 order, all affidavits and all relevant evidence obtained by the  
23 Department in this matter prior to the Commissioner's acceptance,  
24 and all allegations contained in the Accusation filed in the  
25 Department Case No. H-31235 LA, may be considered by the  
26 Department to be true and correct for the purpose of deciding  
27

1 whether or not to grant reinstatement of FIRSTLINE RELOCATION,  
 2 INC.'s license pursuant to Government Code Section 11522.

3 I declare under penalty of perjury under the laws of  
 4 the State of California that the above is true and correct and  
 5 that I am acting freely and voluntarily on behalf of FIRSTLINE  
 6 RELOCATION, INC. to surrender its license and all license rights  
 7 attached thereto.

8 5/17/05 CORONA, CALIFORNIA  
 9 Date and Place

Todd Christopher Kelly Williams  
 FIRSTLINE RELOCATION, INC.  
 By: Todd Christopher Kelly  
 Williams

10  
11  
12  
13  
14  
15  
16  
17  
18  
19  
20  
21  
22  
23  
24  
25  
26  
27

4/20/04  
Play

1 JAMES R. PEEL, Counsel (SBN 47055)  
2 Department of Real Estate  
3 320 West Fourth Street, Suite 350  
4 Los Angeles, CA 90013-1105  
5 Telephone: (213) 576-6982  
6 -or- (213) 576-6913 (Direct)  
7

FILED  
AUG 27 2004  
DEPARTMENT OF REAL ESTATE  
*[Signature]*

8 BEFORE THE DEPARTMENT OF REAL ESTATE

9 STATE OF CALIFORNIA

10 \* \* \*

11 In the Matter of the Accusation of ) No. H-31235 LA  
12 FIRSTLINE RELOCATION, INC., ) ACCUSATION  
13 Respondent. )  
14

15 The Complainant, Janice A. Waddell, a Deputy Real  
16 Estate Commissioner of the State of California, for cause of  
17 accusation against FIRSTLINE RELOCATION, INC., is informed and  
18 alleges in her official capacity as follows:

19 I

20 At all times mentioned herein, FIRSTLINE RELOCATION,  
21 INC. (sometimes hereinafter referred to as "Respondent"), was and  
22 still is licensed by the Department of Real Estate of the State  
23 of California ("Department") as a corporate real estate broker  
24 under the Real Estate Law (Part 1 of Division 4 of the California  
25 Business and Professions Code ).

26 ///  
27 ///

1  
2  
3  
4  
5  
6  
7  
8  
9  
10  
11  
12  
13  
14  
15  
16  
17  
18  
19  
20  
21  
22  
23  
24  
25  
26  
27

II

On or about June 7, 2001, the Franchise Tax Board of the State of California suspended the powers, rights and privileges of Respondent.

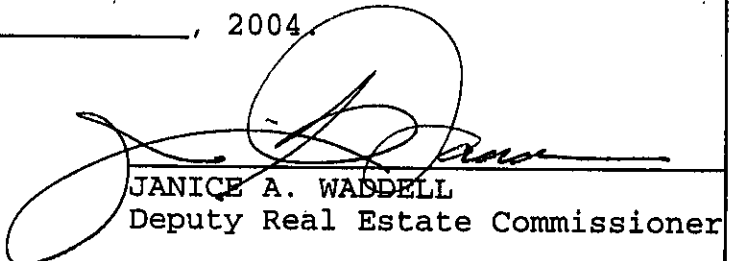
III

The facts alleged above in Paragraph II are in violation of Section 2742 of Title 10, Chapter 6, California Code of Regulations, and constitute grounds for the suspension or revocation of Respondent's license under Sections 10177(d) and 10177(f) of the California Business and Professions Code.

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 all licenses and license rights of Respondent FIRSTLINE RELOCATION, INC., 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 12 day of July, 2004.

  
JANICE A. WADDELL  
Deputy Real Estate Commissioner

cc: Firstline Relocation Inc.  
Janice Waddell  
Sacto.  
KA