DEPARTMENT OF REAL ESTATE

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DEPARTMENT OF REAL ESTATE

STATE OF CALIFORNIA

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· ·):

In the Matter of the Accusation of

NO. H-31796 LA

HARROWOODS INC.; doing business as Cal Property Management; and LOURENA MAE ARROWOOD, individually and as designated officer of Harrowoods Inc.

Respondents.

DECISION

This Decision is being issued in accordance with the provisions of Section 11520 of the Government Code, on evidence of compliance with Section 11505 of the Government Code and pursuant to the Order of Default filed on November 22, 2006, and the findings of fact set forth herein are based on one or more of the following: (1) Respondent Harrowoods Inc.'s express admissions; (2) affidavits; and (3) Department Audit Report LA 010397, dated August 27, 2002, and (4) other evidence.

FACTUAL FINDINGS

1.

On March 28, 2005, Maria Suarez made the Accusation in her official capacity as a Deputy Real Estate Commissioner of the State of California. The Accusation, Statement to Respondent Harrowoods Inc., and a Notice of Defense was mailed by certified mail on March 30, 2005 and May 13, 2005 by regular mail. On November 22, 2006, no Notice of Defense having been filed herein within the time prescribed by Section 11506 of the Government Code, Respondent Harrowoods Inc.'s default was entered herein.

3.

At all times mentioned, Harrowoods Inc. was licensed or had license rights issued by the Department of Real Estate ("Department") as a real estate broker. On May 1, 2001, Harrowoods Inc. was originally licensed as a real estate broker.

4.

At all times mentioned, in the City and County of San Bernardino, Harrowoods Inc. acted as a real estate broker and conducted licensed activities within the meaning of Section 10131(b) of the Code. Harrowoods Inc. operated a property management brokerage.

5.

On August 27, 2002, the Department completed an audit examination of the books and records of Harrowoods Inc. pertaining to the property management activities described in Finding 4, that require a real estate license. The audit examination covered a period of time beginning on March 1, 2001 to May 30, 2002. The audit examination revealed violations of the Code and the Regulations as set forth in the following Findings, and more fully discussed in Audit Report LA 010397 and the exhibits and workpapers attached to said audit report.

6.

In the course of activities described in Finding 4, above, and during the examination period described in Finding 5, Respondent the Harrowoods Inc., acted in violation of the Code and the Regulations in that it:

(a) Permitted, allowed or caused the disbursement of trust funds from the escrow trust account where the disbursement of funds reduced the total of aggregate funds in the escrow trust account, to an amount which, on May 30, 2002, was \$10,931.73, less than the existing aggregate trust fund liability of Harrowoods Inc. to every principal who was an owner of said funds, without first obtaining the prior written consent of the owners of said funds, as required by Code Section 10145 and Regulation 2832.1.

(b) Failed to place trust funds, into a trust fund account in the name of the broker as trustee at a bank or other financial, as required by Code Section 10145 and Regulation 2832.

(c) Failed to perform a monthly reconciliation of the balance of all separate beneficiary or transaction records maintained pursuant to Regulation 2831.1 with the record of all trust funds received and disbursed by the trust account, as required by Code Section 10145 and Regulation 2831.2.

(d) Permitted Martin Standsberry, an unlicensed and unbonded person, to be authorized signatories on the trust account, in violation of Code Section 10145 and Regulation 2834.

(e) During parts of the audit period, managed properties on behalf of others while operating without a designated officer, in violation of Code Section 10130.

(f) Failed to notify the Department of its principal place of business, in violation of Code Section 10162 and Regulation 2715.

(g) Employed an unlicensed individual, Dennis Sellers, as an account manager who was responsible for negotiating and signing management and rental contracts on behalf of Respondent Harrowoods Inc., in violation of Code Section 10137.

DETERMINATION OF ISSUES

1.

The conduct of Respondent Harrowoods Inc. as described in Finding 6, herein above, is in violation of Business and Professions Code ("Code") Sections 10130, 10137, 10145 and 10162 and Sections 2715, 2832, 2831.2, 2832.1 and 2834, of Title 10, Chapter 6, of the California Code or Regulations.

2.

The standard of proof applied was clear and convincing proof to a reasonable certainty.

3.

Cause for disciplinary action against Respondent <u>Harrowoods Inc</u>. exists pursuant to Code Sections <u>10165</u>, <u>10177(d)</u> and 10177(g).

ORDER

The real estate broker license and license rights of
Respondent Harrowoods Inc. under the provisions of Part I
of Division 4 of the Business and Professions Code are
revoked.
This Decision shall become effective at
12 o'clock noon on <u>JAN ≥ 22007</u>
DATED: <u>12-7</u> , 2006
JEFF DAVI Real Estate Commissioner
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1	Department of Real Estate		
2	Department of Real Estate 320 West 4th Street, Ste. 350 Los Angeles, California 90013-1105 NOV 2 2 2006		
3	DEPARTMENT OF REAL ESTATE		
4	-or- (213) 576-6982 (office) By Mulule		
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6			
7			
8	BEFORE THE DEPARTMENT OF REAL ESTATE		
9	STATE OF CALIFORNIA		
10	* * *		
11	In the Matter of the Accusation of) No. H-31796 LA		
12	HARROWOODS INC. doing business as) Cal Property Management; and)		
13 14	LOURENA MAE ARROWOOD,) individually and as designated)		
15	officer of Harrowoods Inc.,)		
16	Degrandenta		
17	Respondents.)		
18	DEFAULT ORDER		
19	Respondent HARROWOODS INC., having failed to file a		
20	Notice of Defense within the time required by Section 11506 of		
21	the Government Code, is now in default. It is, therefore,		
22	ordered that a default be entered on the record in this matter.		
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IT IS SO ORDERED

mber a JEFF DAVI

Real Estate Commissioner

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By: M. DOLORES WEEKS Regional Manager

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1	ELLIOTT MAC LENNAN, SBN 66674
2	Department of Real Estate 320 West 4th Street, Ste. 350
3	Los Angeles, California 90013-1105 DEPARTMENT OF REAL ESTATE
4	Telephone: (213) 576-6911 (direct) -or- (213) 576-6982 (office) By Khuluhul
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8	BEFORE THE DEPARTMENT OF REAL ESTATE
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10	STATE OF CALIFORNIA
11	In the Matter of the Accusation of) No. H-31796 LA
12	HARROWOODS INC. dba Cal Properties,) <u>STIPULATION</u>
13 14	dba Cal Property Management; and) AND LOURENA MAE ARROWOOD; individually) AGREEMENT and as designated officer of)
15	Harrowoods Inc.)
16	Respondents,)
17	.)
18	
19	It is hereby stipulated by and between Respondent
20	LOURENA MAE ARROWOOD, individually and as former designated
21	officer of Harrowoods Inc. (sometimes referred to as
22	"Respondent"), represented by Phillip R. Kimes, Attorney At Law
23	and the Complainant, acting by and through Elliott Mac Lennan,
24	Counsel for the Department of Real Estate, as follows for the
25	purpose of settling and disposing of the Accusation
26	("Accusation") filed on March 30, 2005, in this matter:
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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
 submitted solely on the basis of the provisions of this
 Stipulation and Agreement ("Stipulation").

⁸ 2. Respondent has received, read and understands the
 ⁹ Statement to Respondent, the Discovery Provisions of the APA and
 ¹⁰ the Accusation filed by the Department of Real Estate in this
 ¹¹ proceeding.

12 Respondent timely filed a Notice of Defense 3. 13 pursuant to Section 11506 of the Government Code for the purpose 14 of requesting a hearing on the allegations in the Accusation. 15 Respondent hereby freely and voluntarily withdraws said Notice of 16 Defense. Respondent acknowledges that she understands that by 17 withdrawing said Notice of Defense she thereby waives her right 18 to require the Commissioner to prove the allegations in the 19 Accusation at a contested hearing held in accordance with the 20 provisions of the APA and that she will waive other rights 21 afforded to her in connection with the hearing such as the right 22 23 to present evidence in her defense the right to cross-examine 24 witnesses.

4. This Stipulation is based on the factual
allegations contained in the Accusation. In the interest of

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expedience and economy, Respondent chooses not to contest these allegations, but to remain silent and understands that, as a result thereof, these factual allegations, without being admitted or denied, will serve as a prima facie basis for the disciplinary action stipulated to herein. The Real Estate Commissioner shall not be required to provide further evidence to prove said factual allegations.

5. This Stipulation and Respondent's decision not to contest the Accusation is made for the purpose of reaching an agreed disposition of this proceeding and is expressly limited to this proceeding and any other proceeding or case in which the Department of Real Estate ("Department"), the state or federal government, or any agency of this state, another state or federal is involved.

It is understood by the parties that the Real 6. 16 Estate Commissioner may adopt this Stipulation as his Decision in 17 this matter thereby imposing the penalty and sanctions on 18 Respondent's real estate licenses and license rights as set forth 19 in the "Order" herein below. In the event that the Commissioner 20 in his discretion does not adopt the Stipulation, it shall be 21 void and of no effect and Respondent shall retain the right to a 22 hearing and proceeding on the Accusation under the provisions of 23 24 the APA and shall not be bound by any stipulation or waiver made 25 herein. 26 111

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The Order or any subsequent Order of the Real 7. 1 Estate Commissioner made pursuant to this Stipulation shall not 2 constitute an estoppel, merger or bar to any further 3 administrative or civil proceedings by the Department of Real Estate with respect to any matters which were not specifically 5 alleged to be causes for Accusation in this proceeding but do 6 constitute a bar, estoppel and merger as to any allegations 7 actually contained in the Accusations against Respondent herein. 8

⁹ 8. Respondent understands that by agreeing to this
¹⁰ Stipulation, Respondent agrees to pay, pursuant to Business and
¹¹ Professions Code Section 10148, the cost of audit which led to
¹² this disciplinary action. The amount of said cost for the audit
¹³ is \$8,837.84.

Respondent has received, read, and understands the 9. 15 "Notice Concerning Costs of Subsequent Audit". Respondent 16 further understands that by agreeing to this Stipulation, the 17 findings set forth below in the Determination of Issues become 18 final, and the Commissioner may charge Respondent for the cost of 19 any subsequent audit conducted pursuant to Business and 20 Professions Code Section 10148 to determine if the violations 21 have been corrected. The maximum cost of the subsequent audit 22 23 will not exceed \$8,837.84.

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1	DETERMINATION OF ISSUES
2	By reason of the foregoing, it is stipulated and agreed
3	that the following determination of issues shall be made:
4	I. ·
5	The conduct of LOURENA MAE ARROWOOD, as described in
6	Paragraph 4, above, is in violation of Sections 10145 and 10159.2
7	of the Business and Professions Code ("Code") and Sections 2725
8	and 2832.1 of Title 10, Chapter 6 of the California Code of
9	Regulations ("Regulations") and is a basis for the suspension or
10	revocation of Respondent's license and license rights as a
11	violation of the Real Estate Law pursuant to Code Section
12	10177(d), 10177(g) and 10177(h).
13	ORDER
14	WHEREFORE, THE FOLLOWING ORDER is hereby made:
15	I.
16 17	All licenses and licensing rights of Respondent
18	LOURENA MAE ARROWOOD, under the Real Estate Law are revoked;
19	provided, however, a restricted real estate broker license shall
20	be issued to Respondent, pursuant to Section 10156.5 of the
21	Business and Professions Code, if Respondent makes application
22	therefor and pays to the Department of Real Estate the
23	appropriate fee for the restricted license within ninety (90)
24	days from the effective date of this Decision. The restricted
25	license issued to Respondent shall be subject to all of the
26	provisions of Section 10156.7 of the Code and the following
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limitations, conditions and restrictions imposed under authority of Section 10156.6 of that Code:

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The restricted license issued to Respondent may be
 suspended prior to hearing by Order of the Real Estate
 Commissioner in the event of Respondent's conviction or plea of
 nolo contendere to a crime which is substantially related to
 Respondent's fitness or capacity as a real estate licensee.

2. The restricted license issued to Respondent may
 be suspended prior to hearing by Order of the Real Estate
 Commissioner on evidence satisfactory to the Commissioner that
 Respondent has violated provisions of the California Real Estate
 Law, the Subdivided Lands Law, Regulations of the Real Estate
 Commissioner or conditions attaching to the restricted license.

3. Respondent shall not be eligible to apply for the issuance of an unrestricted real estate license nor for the removal of any of the conditions, limitations or restrictions of a restricted license until two (2) years has elapsed from the effective date of this Decision.

Respondent shall, within nine (9) months from the 4. 20 effective date of this Decision, present evidence satisfactory to 21 the Real Estate Commissioner that Respondent has, since the most 22 23 recent issuance of an original or renewal real estate license, 24 taken and successfully completed the continuing education 25 requirements of Article 2.5 of Chapter 3 of the Real Estate Law 26 for renewal of a real estate license. If Respondent fails to 27

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satisfy this condition, the Commissioner may order the suspension of the restricted license until the Respondent presents such evidence. The Commissioner shall afford Respondent the opportunity for a hearing pursuant to the Administrative Procedure Act to present such evidence.

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5. Respondent shall within six months from the 6 effective date of the restricted license, take and pass the 7 8 Professional Responsibility Examination administered by the 9 Department including the payment of the appropriate examination 10 fee. If Respondent fails to satisfy this condition, the 11 Commissioner may order suspension of the restricted license until 12 respondent passes the examination.

All licenses and licensing rights of Respondent are 6. 14 indefinitely suspended unless or until Respondent provides proof 15 satisfactory to the Commissioner, of having taken and 16 successfully completed the continuing education course on trust 17 fund accounting and handling specified in paragraph (3) of 18 subdivision (a) of Section 10170.5 of the Business and 19 Professions Code. Proof of satisfaction of this requirement 20 includes evidence that respondent has successfully completed the 21 trust fund account and handling continuing education course 22 within 120 days prior to the effective date of the Decision in 23 24 this matter.

7. During the time Respondent is licensed as a restricted real estate broker, Respondent shall not serve as the

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designated broker at any corporate real estate broker unless 1 Respondent is the owner of record of the controlling shares in 2 said corporation. 3 II. 4 Pursuant to Section 10148 of the Business and 5 Professions Code, Respondent shall pay the Commissioner's 6 reasonable cost for (a) the audit which led to this disciplinary 7 action and (b) a subsequent audits to determine if Respondent 8 9 LOURENA MAE ARROWOOD is now in compliance with the Real Estate 10 The cost of the audit which led to this disciplinary action Law. 11 is \$8,837.84. In calculating the amount of the Commissioner's 12 reasonable cost, the Commissioner may use the estimated average 13 hourly salary for all persons performing audits of real estate 14 brokers, and shall include an allocation for travel time to and 15 from the auditor's place of work. Said amount for the prior and 16 subsequent audits shall not exceed \$17,675.68. 17 Respondent shall pay such cost within 60 days of 18 receiving an invoice from the Commissioner detailing the 19 activities performed during the audit and the amount of time 20 spent performing those activities. 21 The Commissioner may suspend the license of Respondent 22 pending a hearing held in accordance with Section 11500, et seq., 23 24 of the Government Code, if payment is not timely made as provided 25 for herein, or as provided for in a subsequent agreement between 26 the Respondent and the Commissioner. The suspension shall remain 27

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1	in effect until payment is made in full or until Respondent				
2	enters into an agreement satisfactory to the Commissioner to				
3	provide for payment, or until a decision providing otherwise is				
4	adopted following a hearing held pursuant to this condition.				
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7	DATED: 10 - 21-05				
8		IOTT MAC LENNAN, Counsel for Department of Real Estate			
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EXECUTION OF THE STIPULATION

I have read the Stipulation and discussed it with my 3 Its terms are understood by me and are agreeable and counsel. 4 acceptable to me. I understand that I am waiving rights given to 5 us by the California Administrative Procedure Act (including but 6 not limited to Sections 11506, 11508, 11509 and 11513 of the 7 Government Code), and I willingly, intelligently and voluntarily 8 9 waive those rights, including the right of requiring the 10 Commissioner to prove the allegations in the Accusation at a 11 hearing at which we would have the right to cross-examine 12 witnesses against me and to present evidence in defense and 13 mitigation of the charges.

Respondent can signify acceptance and approval of the 15 terms and conditions of this Stipulation by faxing a copy of its 16 signature page, as actually signed by Respondent, to the 17 Department at the following telephone/fax number: Elliott Mac 18 Lennan at (213) 576-6917. Respondent agrees, acknowledges and 19 understands that by electronically sending to the Department a 20 fax copy of Respondent's actual signature as it appears on the 21 Stipulation, that receipt of the faxed copy by the Department 22 23 shall be as binding on Respondent as if the Department had 24 received the original signed Stipulation.

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KIMES PAGE 02/02 10/22/2005 14:40 9495512527 UN CITZUUD PRI USIBB PR INC FAX NO. 951 5142 - P. 11 18/22/2885 13:57 945501 2577 KIMEG PAGE 11/11 00T-21-05 FRI 02:57 PH FAX NO, P. 12 1 2 NATED: 10-21-05 à LOURENA MAE ARRONOOD Individually 4 and as former designated officer of Marrowoods Inc., Raspondent ß đ DATED, 10-21-05 7 PHILLIP R. RINES, EEQ. Attorney for ŝ Respondent Lourens Mas Arrowood, 0 approved as to form. to * * * 11 The foregoing Stipulation and Agreement is hereby 12 adopted as my Decision as to Respondent LOURENA MAB ARROWOOD as 13 former designated officer of Harrowoeds Inc. and shall become 24 bifoctive at 12 o'clock noon on 15 _, 2008. IT IS SO ORDERED Å _/ 2005. 17 18 JEFF DAVI Real Estate Commissioner 29 ZD 21 29 23 24 25 26 27 - 11 -

1 DATED: 2 LOURENA MAE ARROWOOD individually and as former designated officer of 3 Harrowoods Inc., Respondent 4 5 DATED: 6 PHILLIP R. KIMES, ESQ. Attorney for Respondent Lourena Mae Arrowood, 7 approved as to form. 8 9 10 The foregoing Stipulation and Agreement is hereby 11 adopted as my Decision as to Respondent LOURENA MAE ARROWOOD as 12 former designated officer of Harrowoods Inc. and shall become 13 DEC - 7 effective at 12 o'clock noon on _ 2005. 14 - 3-0 IT IS SO ORDERED , 2005. 15 16 JEFF DAVI 17 Real Estate Commissioner 18 19 AIL 20 21 22 23 24 25 26 27 - 11 -

the for	
1	MARTHA J. ROSETT, Counsel(SBN 142072)
2	Department of Real Estate DEPARTMENT OF REAL ESTATE 320 West Fourth St., #350
3	Los Angeles, CA 90013
. 4	(213) 576-6982 (213) 576-6907
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· 8	BEFORE THE DEPARTMENT OF REAL ESTATE
. 9	STATE OF CALIFORNIA
10	* * * *
11	In the Matter of the Accusation of) No. H-31796 LA
12	HARROWOODS INC., dba Cal Properties,) <u>A C C U S A T I O N</u>
13	dba Cal Property Management; and) LOURENA MAE ARROWOOD, individually and)
14	as Designated broker-officer of) Harrowoods Inc.,)
15) Respondents.)
16)
17	The Complainant, Maria Suarez, a Deputy Real Estate
18	Commissioner, for cause of Accusation against HARROWOODS INC.,
19	dba Cal Properties, and dba Cal Property Management; and LOURENA
20	MAE ARROWOOD, individually and as designated broker-officer of
21	Harrowoods Inc., is informed and alleges as follows:
22	1.
23	The Complainant, Maria Suarez, a Deputy Real Estate
24	Commissioner of the State of California, makes this Accusation in
25	her official capacity.
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1 Respondent HARROWOODS INC., dba Cal Properties, and dba 2 Cal Property Management (hereinafter "H.I."), is presently 3 licensed and at all times relevant herein was licensed under the ۸ Real Estate Law, Part 1 of Division 4 of the California Business 5 and Professions Code (hereinafter "Code") as a corporate real 6 estate broker. Respondent H.I. has been licensed by the 7 8 Department of Real Estate of the State of California (hereinafter 9 "Department") as a corporate real estate broker since on or 10 before May 1, 2001. At all times relevant herein, Respondent 11 H.I. was authorized to act by and through Respondent LOURENA MAE 12 ARROWOOD as the designated officer and broker responsible, 13 pursuant to the provisions of Code Section 10159.2 for the 14 supervision and control of the activities conducted on behalf of 15 H.I. by H.I.'s officers and employees. On or about May 7, 2002, 16 Respondent ARROWOOD cancelled her status as designated officer of 17 H.I. Since that time, there has been no designated officer-18 broker of record on file with the Department. 19 3. 20 Respondent LOURENA MAE ARROWOOD (hereinafter 21

2.

²² "ARROWOOD"), is licensed and at all times relevant herein was ²³ licensed under the Code as a real estate broker. Respondent ²⁴ ARROWOOD has been licensed by the Department since on or before ²⁵ March 28, 1986. Between May 1, 2001 and May 7, 2002, Respondent ²⁶ ARROWOOD was the broker-officer of Respondent HARROWOODS INC.

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responsible pursuant to the provisions of Code Section 10159.2 for the supervision and control of the activities conducted on behalf of H.I. by H.I.'s officers and employees.

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At all times material herein, Respondents engaged in the business of, acted in the capacity of, advertised or assumed to act as a real estate broker in the State of California within the meaning of Code Section 10131(b) for another or others in expectation of compensation. Said activity included collecting rents and security deposits, advertising properties, screening tenants and managing rental properties on behalf of the owners.

5.

All further references to "Respondents" include All further references to "Respondents" include Respondent H.I. and Respondent ARROWOOD, and also include the employees, agents and real estate licensees employed by or associated with each Respondent, who at all times material herein were engaged in the furtherance of the business or operations of said parties and who were acting within the course and scope of their authority, agency or employment.

Audit Violations

6.

23On or about August 27, 2002, the Department completed24its examination of Respondent H.I.'s books and records,

²⁵ pertaining to the real estate activities described in Paragraph 4 ²⁶ above, covering a period from approximately March 1, 2001 through

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May 30, 2002. The primary purpose of the examination was to determine Respondent's compliance with the Real Estate Law. The examination, Audit No. LA 010397, revealed violations of the Business and Professions Code, of Title 10, Chapter 6, California Code of Regulations ("Regulations"), as more specifically set forth in the Audit Reports and Exhibits attached thereto.

7.

In the course of activities described in Paragraph 4
 above, and during the examination period described in Paragraph
 6, Respondents acted in violation of the Business and Professions
 Code and the Regulations in that:

12 a) As of April 15, 2002, the property management trust 13 account contained a shortage of \$19,720.08. As of May 30, 2002, 14 the shortage was \$10,931.73. Respondents caused, permitted 15 and/or allowed the withdrawal or disbursement of trust funds from 16 this account without the prior written consent of every principal 17 who then was an owner of funds in the account, thereby reducing 18 the balance of funds in the said account to an amount less than 19 the existing aggregate trust fund liability of the broker to all 20 the owners of said trust funds, in violation of Code Section 21 10145 and Regulation 2832.1. 22

b) The bank account used to handle property management
 trust funds was not in the broker's name as trustee and was not
 designated as a trust account, in violation of Code Section 10145
 and Regulation 2832.

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c) Respondents failed to perform and maintain a monthly reconciliation of all trust funds received and disbursed and the total balance of all separate beneficiary records for the trust fund account, in violation of Code Section 10145 and Regulation 2831.2.

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d) Martin Standsberry, who was not licensed by the
Department, was authorized to sign trust account checks without
fidelity bond coverage from March 1, 2001 through April 30, 2001
and from May 1, 2002 through May 30, 2002, in violation of Code
Section 10145 and Regulation 2834.

e) Respondent ARROWOOD, as designated broker-officer of H.I., did not exercise control and supervision over the trust account records during the period from May 1, 2002 through May 7, 2002, in violation of Code Section 10159.2 and Regulation 2725.

f) During parts of the audit period, between March 1, 2001 through April 30, 2001 and from April 15, 2002 through May 30, 2002, Respondent H.I., as a corporation, managed properties on behalf of others in expectation of compensation while operating without a designated broker-officer, in violation of Code Section 10130.

g) According to the Department's licensing records,
 Respondent H.I. cancelled its main office at 225 Airport Dr. #240
 in San Bernardino on May 7, 2002. It continued to perform
 property management activities, but did not notify the Department

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. 1	of their new principal place of business, in violation of Code
2	Section 10162 and Regulation 2715.
3	h) Respondents employed an unlicensed individual,
4	Dennis Sellers, as an account manager who was responsible for
5	negotiating and signing management and rental contracts on behalf
6	of the corporation, in violation of Code Section 10137.
. 7	The foregoing violations constitute cause for the
8	suspension or revocation of Respondent H.I.'s and Respondent
9	ARROWOOD's real estate licenses and license rights under the
10	provisions of Code Sections 10177(d), 10165, and/or 10177(g).
11	
12 ,	Failure to Supervise
13.	8.
14	The violations set forth above constitute cause for the suspension or revocation of Respondent LOURENA MAE ARROWOOD's
15	real estate license and/or license rights as the broker-officer
16 17	of Respondent H.I. designated pursuant to Code Section 10159.2,
17	for failing to supervise the activities of the corporation, in
19	violation of Code Sections 10177(h), 10177(d) and/or 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 all licenses and/or license rights of Respondent 5 HARROWOODS INC. and Respondent LOURENA MAE ARROWOOD under the б Real Estate Law and for such other and further relief as may be 7 proper under applicable provisions of law. 8 Dated at Los Angeles | 22 lifornia 9 this C day of 2005. 10 11 12 Real Estate Commissioner Deputy 13 14 15 16 17 18 19 20 21 cc: Harrowoods Inc. 22 Lourena Mae Arrowood Sacto. 23 Janice Waddell Maria Suarez 24 Audits (Kwong) 25 26 27