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**FILED**

FEB 08 2012

DEPARTMENT OF REAL ESTATE

BY: Zai gr

BEFORE THE DEPARTMENT OF REAL ESTATE

STATE OF CALIFORNIA

\* \* \*

In the Matter of the Accusation of ) No. H-35746 LA  
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)  
JOYCE MARIE MACK, et al., )  
)  
)  
)  
)  
)  
Respondents. )

ORDER SUSPENDING REAL ESTATE LICENSE

To: JOYCE MARIE MACK 2000 S. Grove #109  
64 Deer Creek Ontario, CA 91761  
Pomona, CA 91766

Effective June 23, 2010, Respondent entered into a Stipulation and Agreement ("Stipulation") with the Department. Pursuant to the terms of the Stipulation Respondent agreed to pay for the audit as set forth in the Real Estate Commissioner's Decision in Case Nos. H-35746 LA and H-35750 LA, effective August 5, 2010. The Commissioner has determined that Respondent has

1 failed to satisfy this condition by not paying for the remaining  
2 balance of the audit costs in the amount of \$6.529.75.

3 NOW, THEREFORE, IT IS ORDERED under that the real  
4 estate broker licenses heretofore issued to Respondent and the  
5 exercise of any privileges thereunder are hereby suspended until  
6 such time as Respondent provides proof satisfactory to the  
7 Department of having paid for the audit referred to above or  
8 pending final determination made after hearing (see "Hearing  
9 Rights" set forth below).

10 IT IS FURTHER ORDERED that all license certificates and  
11 identification cards issued by the Department of Real Estate  
12 which are in the possession of Respondents be immediately  
13 surrendered by personal delivery or by mailing in the enclosed  
14 self-addressed envelope to:

15 DEPARTMENT OF REAL ESTATE  
16 Attention: Flag Section  
17 Post Office Box 187000  
Sacramento, CA 95818-7000

18 HEARING RIGHTS: you have the right to a hearing to  
19 contest the Commissioner's determination that you are in  
20 violation of the condition that you pay for the audit. If you  
21 desire a hearing, you must submit a written request. The request  
22 may be in any form as long as it is in writing and indicates that  
23 you want a hearing. Unless a written request for a hearing,  
24 signed by or on behalf of you, is delivered or mailed to the  
25 Department at 320 West Fourth Street, Suite 350, Los Angeles,  
26 California 90013, within 20 days after the date that this Order  
27

1 was mailed to or served on you, the Department will not be  
2 obligated or required to provide you with a hearing.

3 This Order shall be effective immediately.

4 DATED: 1/10/12

5 BARBARA J. BIGBY  
6 Acting Real Estate Commissioner

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**FILED**

DEC - 2 2010

DEPARTMENT OF REAL ESTATE  
BY: 

BEFORE THE DEPARTMENT OF REAL ESTATE  
STATE OF CALIFORNIA

\* \* \*

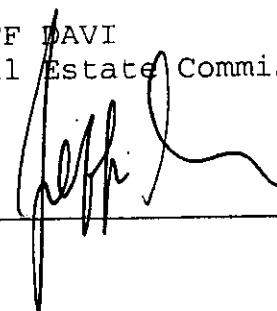
In the Matter of the Accusation of ) No. H-35746 LA  
)  
FINANCIAL SERVICES NETWORK GROUP )  
INC.,; JOYCE MARIE MACK, )  
individually and as designated )  
officer of Financial Services )  
Network Group Inc.; and )  
DIONDRA D. ANDERSON, )  
)  
Respondents. )

DISMISSAL

The Accusation filed against DIONDRA D. ANDERSON on  
March 4, 2009, is dismissed.

IT IS SO ORDERED this 30 day of November, 2010.

JEFF DAVI  
Real Estate Commissioner



*back*

**FILED**

JUL -6 2010

DEPARTMENT OF REAL ESTATE

BY: 

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)

BEFORE THE DEPARTMENT OF REAL ESTATE

STATE OF CALIFORNIA

\* \* \*

In the Matter of the Accusation of

No. H-35746 LA  
L-2009060014

FINANCIAL SERVICES NETWORK GROUP  
INC., ; JOYCE MARIE MACK,  
individually and as designated  
officer of Financial Services  
Network Group Inc.; and  
DIONDRA D. ANDERSON,

STIPULATION AND AGREEMENT

Respondents.

In the Matter of the Accusation of

No. H-35750 LA

ALL CITIES NETWORK INC., ; and  
JOYCE MARIE MACK, individually and  
as former designated officer of  
All Cities Network Inc.,

STIPULATION AND AGREEMENT

Respondents.

1 It is hereby stipulated by and between Respondents  
2 FINANCIAL SERVICES NETWORK GROUP INC., ALL CITIES NETWORK INC.  
3 and JOYCE MARIE MACK, individually and as designated officer of  
4 Financial Services Network Group Inc. and as former designated  
5 officer of All Cities Network Inc., (sometimes referred to as  
6 "Respondent), and the Complainant, acting by and through Elliott  
7 Mac Lennan, Counsel for the Department of Real Estate, as follows  
8 for the purpose of settling and disposing of the Accusation filed  
9 on March 4, 2009, against FINANCIAL SERVICES NETWORK GROUP INC.  
10 and JOYCE MARIE MACK and the First Amended Accusation filed on  
11 March 24, 2009, against ALL CITIES NETWORK INC. and JOYCE MARIE  
12 MACK (collectively "Accusation"):

13 1. All issues which were to be contested and all  
14 evidence which was to be presented by Complainant and Respondents  
15 at a formal hearing on the Accusation, which hearing was to be  
16 held in accordance with the provisions of the Administrative  
17 Procedure Act ("APA"), shall instead and in place thereof be  
18 submitted solely on the basis of the provisions of this  
19 Stipulation and Agreement ("Stipulation").

20 2. Respondents have received, read and understand the  
21 Statement to Respondent, the Discovery Provisions of the APA and  
22 the Accusation filed by the Department of Real Estate in this  
23 proceeding.

24 3. Respondents timely filed a Notice of Defense  
25 pursuant to Section 11506 of the Government Code for the purpose  
26 of requesting a hearing on the allegations in the Accusation.  
27

1 Respondents hereby freely and voluntarily withdraw said Notice of  
2 Defense. Respondents acknowledge that they understand that by  
3 withdrawing said Notice of Defense they thereby waive their right  
4 to require the Commissioner to prove the allegations in the  
5 Accusation at a contested hearing held in accordance with the  
6 provisions of the APA and that they will waive other rights  
7 afforded to them in connection with the hearing such as the right  
8 to present evidence in their defense and the right to cross-  
9 examine witnesses.

10           4. This Stipulation is based on the factual  
11 allegations contained in the Accusation. In the interest of  
12 expedience and economy, Respondents choose not to contest these  
13 allegations, but to remain silent and understand that, as a  
14 result thereof, these factual allegations, without being admitted  
15 or denied, will serve as a prima facie basis for the disciplinary  
16 action stipulated to herein. The Real Estate Commissioner shall  
17 not be required to provide further evidence to prove said factual  
18 allegations.  
19

20           5. This Stipulation is made for the purpose of  
21 reaching an agreed disposition of this proceeding and is  
22 expressly limited to this proceeding and any other proceeding or  
23 case in which the Department of Real Estate ("Department"), the  
24 state or federal government, or any agency of this state, another  
25 state or federal government is involved.  
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1                   6. It is understood by the parties that the Real  
2 Estate Commissioner may adopt this Stipulation as his Decision in  
3 this matter thereby imposing the penalty and sanctions on  
4 Respondents' real estate licenses and license rights as set forth  
5 in the "Order" herein below. In the event that the Commissioner  
6 in his discretion does not adopt the Stipulation, it shall be  
7 void and of no effect and Respondents shall retain the right to a  
8 hearing and proceeding on the Accusation under the provisions of  
9 the APA and shall not be bound by any stipulation or waiver made  
10 herein.

11                   7. The Order or any subsequent Order of the Real  
12 Estate Commissioner made pursuant to this Stipulation shall not  
13 constitute an estoppel, merger or bar to any further  
14 administrative or civil proceedings by the Department of Real  
15 Estate with respect to any matters which were not specifically  
16 alleged to be causes for Accusation in this proceeding but do  
17 constitute a bar, estoppel and merger as to any allegations  
18 actually contained in the Accusations against Respondent herein.  
19

20                   8. Respondent JOYCE MARIE MACK understands that by  
21 agreeing to this Stipulation, Respondent agrees to pay, pursuant  
22 to Business and Professions Code Section 10148, the cost of the  
23 audit for FINANCIAL SERVICES NETWORK GROUP INC. (LA 070399) The  
24 amount of said cost for the original audit is \$7,529.75.

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DETERMINATION OF ISSUES

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

I.

The conduct, acts or omissions of FINANCIAL SERVICES NETWORK GROUP INC. and JOYCE MARIE MACK as described in Paragraph 4, above, are in violation of Sections 10137, 10145, 10176(g) and 10177(f) of the Business and Professions Code ("Code") and Sections 2742(c), 2831 and 2831.1 of Title 10, Chapter 6 of the California Code of Regulations ("Regulations") and is a basis for discipline of Respondents' license and license rights as violation of the Real Estate Law pursuant to Code Section and 10177(g).

II.

The conduct, acts or omissions of ALL CITIES NETWORK INC. and JOYCE MARIE MACK, as described in Paragraph 4, above, are in violation of Code Section 10148 and is a basis for discipline of Respondents' license and license rights as violation of the Real Estate Law pursuant to Code Section 10177(g).

III.

The conduct, acts or omissions of JOYCE MARIE MACK, as described in Paragraph 4, above, are in violation of Code Section 10159.2 and is a basis for discipline of Respondent's license and

1 license rights as violation of the Real Estate Law pursuant to  
2 Code Section 10177(g).

3 ORDER

4 WHEREFORE, THE FOLLOWING ORDER is hereby made:

5 I.

6 All licenses and licensing rights of Respondent  
7 FINANCIAL SERVICES NETWORK GROUP INC., under the Real Estate Law  
8 are revoked.

9 II.

10 All licenses and licensing rights of Respondent ALL  
11 CITIES NETWORK INC., under the Real Estate Law are revoked.

12 III.

13 The real estate broker license of Respondent JOYCE  
14 MARIE MACK, under the Real Estate Law is revoked; provided,  
15 however, a restricted real estate broker license shall be issued  
16 to said Respondent, pursuant to Section 10156.5 of the Business  
17 and Professions Code if Respondent:

18 (A) Make application thereof and pays to the Department  
19 of Real Estate the appropriate fee for the restricted license  
20 within ninety (90) days from the date of issuance of the  
21 restricted license.

22 (B) Respondent shall, prior to and as a condition of  
23 the issuance of the restricted license, submit proof satisfactory  
24 to the Commissioner of having taken and successfully completed  
25 the continuing education course on trust fund accounting and  
26  
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1 handling specified in paragraph (3) of subdivision (a) of Section  
2 10170.5 of the Business and Professions Code. Proof of  
3 satisfaction of this requirement includes evidence that  
4 Respondent has successfully completed the trust fund account and  
5 handling continuing education course within 120 days prior to the  
6 date of issuance of the restricted license.

7 The restricted license issued to Respondent shall be  
8 subject to all of the provisions of Section 10156.7 of the  
9 Business and Professions Code and to the followings limitations,  
10 conditions and restrictions imposed under authority of Section  
11 10156.6 of that Code.

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

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

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

3 4. Respondent JOYCE MARIE MACK shall, within nine (9)  
4 months from the effective date of this Decision, present evidence  
5 satisfactory to the Real Estate Commissioner that Respondent has,  
6 since the most recent issuance of an original or renewal real  
7 estate license, taken and successfully completed the continuing  
8 education requirements of Article 2.5 of Chapter 3 of the Real  
9 Estate Law for renewal of a real estate license. If Respondent  
10 fails to satisfy this condition, the Commissioner may order the  
11 suspension of the restricted license until Respondent presents  
12 such evidence. The Commissioner shall afford Respondent the  
13 opportunity for a hearing pursuant to the Administrative  
14 Procedure Act to present such evidence.

15 IV.  
16

17 Pursuant to Section 10148 of the Business and  
18 Professions Code, Respondent JOYCE MARIE MACK, shall pay the  
19 Commissioner's reasonable cost for (a) the audit which led to  
20 this disciplinary action (b) a subsequent audit to determine if  
21 Respondents are now in compliance with the Real Estate Law. The  
22 cost of the original and subsequent audits which led to this  
23 disciplinary action is \$7,529.75. In calculating the amount of  
24 the Commissioner's reasonable cost, the Commissioner may use the  
25 estimated average hourly salary for all persons performing audits  
26 of real estate brokers, and shall include an allocation for  
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travel time to and from the auditor's place of work.

Respondent JOYCE MARIE MACK 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 Respondents 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 Respondents enter 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.

DATED: 4-7-10

ELL  
ELLIOTT MAC LENNAN, Counsel for  
the Department of Real Estate

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EXECUTION OF THE STIPULATION

We have read the Stipulation and discussed it with our attorney. 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.


MAILING AND FACSIMILE

Respondent (1) shall mail the original signed signature page of the stipulation herein to Elliott Mac Lennan: Attention: Legal Section, Department of Real Estate, 320 W. Fourth St., Suite 350, Los Angeles, California 90013-1105. Additionally, Respondents shall also (2) facsimile a copy of signed signature page, to the Department at the following facsimile number: 213.576.6917, Attention: Elliott Mac Lennan.


A facsimile constitutes acceptance and approval of the terms and conditions of this stipulation. Respondents agree, acknowledge and understand that by electronically sending to the Department a facsimile copy of Respondents' actual signature as

1 they appear on the stipulation that receipt of the facsimile copy  
2 by the Department shall be as binding on Respondents as if the  
3 Department had received the original signed stipulation.  
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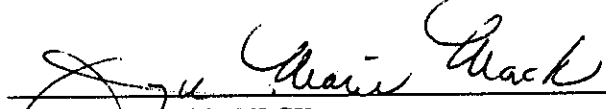
7 DATED: 6-7-2010

  
FINANCIAL SERVICES NETWORK GROUP  
INC., a corporate real estate  
broker,  
BY: JOYCE MARIE MACK D.O.


11  
12 DATED: 6-7-2010

  
ALL CITIES NETWORK INC.,  
a corporate real estate broker,  
BY: JOYCE MARIE MACK D.O.

15  
16  
17 DATED: 6-7-2010


  
JOYCE MARIE MACK,  
individually and as designated  
officer of Financial Services  
Network Group Inc. and  
All Cities Network Inc.

18  
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23 DATED: 6-7-2010

  
JACQUELINE STATEN, ESQ.  
Attorney for Respondents  
Approved as to form

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IT IS SO ORDERED 6/23, 2010.





1 ELLIOTT MAC LENNAN, SBN 66674  
2 Department of Real Estate  
3 320 West 4th Street, Ste. 350  
4 Los Angeles, California 90013-1105

5 Telephone: (213) 576-6911 (direct)  
6 -or- (213) 576-6982 (office)

**FILED**

MAR - 4 2009

DEPARTMENT OF REAL ESTATE

BY: *Denaly*

BEFORE THE DEPARTMENT OF REAL ESTATE

STATE OF CALIFORNIA

\* \* \*

In the Matter of the Accusation of )

No. H-35746 LA

FINANCIAL SERVICES NETWORK GROUP )  
INC.,; JOYCE MARIE MACK, )  
individually and as designated )  
officer of Financial Services )  
Network Group Inc.; and )  
DIONDRA D. ANDERSON, )

A C C U S A T I O N

Respondents. )

The Complainant, Robin Trujillo, a Deputy Real Estate

Commissioner of the State of California, for cause of Accusation  
against FINANCIAL SERVICES NETWORK GROUP INC.; JOYCE MARIE MACK,  
individually and as designated officer of Financial Services  
Network Group Inc.; and DIONDRA D. ANDERSON aka Diøndra Anderson,  
alleges as follows:

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1.

The Complainant, Robin Trujillo, acting in her official capacity as a Deputy Real Estate Commissioner of the State of California, makes this Accusation against FINANCIAL SERVICES NETWORK GROUP INC., JOYCE MARIE MACK and DIONDRA D. ANDERSON.

2.

All references to the "Code" are to the California Business and Professions Code and all references to "Regulations" are to Title 10, Chapter 6, California Code of Regulations.

#### LICENSE HISTORY

3.

A. At all times mentioned, FINANCIAL SERVICES NETWORK GROUP INC. ("FSNGI") and JOYCE MARIE MACK ("MACK") were licensed or had license rights issued by the Department of Real Estate ("Department") as real estate brokers.

B. At all times material herein, FSNGI was licensed by the Department of Real Estate of the State of California (hereinafter "Department") as a corporate real estate broker by and through MACK, as the designated officer and broker responsible, pursuant to Code Section 10159.2 of the Business and Professions Code for supervising the activities requiring a real estate license conducted on behalf FSNGI of by FSNGI' officers, agents and employees, including MACK. FSNGI was originally licensed as a corporate real estate broker on August 12, 2005. MACK was initially licensed as a real estate broker on February

1 28, 2001. Since FSNGI's inception, MACK has been the designated  
2 officer.

3 C. At all times mentioned, DIONDRA D. ANDERSON  
4 ("ANDERSON") was licensed or had license rights issued by the  
5 Department of Real Estate ("Department") as a real estate  
6 salesperson. ANDERSON was originally licensed as a salesperson  
7 on April 22, 2006.

8 BROKERAGE

9 4.

10 At all times mentioned, in the City of Ontario, County  
11 of San Bernardino, FSNGI acted as a real estate broker conducting  
12 licensed activities within the meaning of Code Section 10131(d)  
13 by operating a mortgage and loan brokerage.

14 FIRST CAUSE OF ACTION

15 AUDIT EXAMINATION

16 5.

17 On November 5, 2008, the Department completed an audit  
18 examination of the books and records of FSNGI pertaining to the  
19 mortgage and loan activities described in Paragraph 4, which  
20 require a real estate license. The audit examination covered a  
21 period of time beginning on January 1, 2006 to May 31, 2008. The  
22 audit examination revealed violations of the Code and the  
23 Regulations as set forth in the following paragraphs, and more  
24 fully discussed in Audit Report LA 070399 and the exhibits and  
25 work papers attached to said audit report.  
26  
27

TRUST ACCOUNT

6.

FSNGI did not maintain a trust account during the audit period.

VIOLATIONS OF THE REAL ESTATE LAW

7.

In the course of activities described in Paragraph 4, above, and during the examination period described in Paragraph 5, Respondents FSNGI and MACK, acted in violation of the Code and the Regulations in that they:

(a) Failed to maintain a control record in the form of a columnar record in chronological order of all "Trust Funds Received, Not Placed Broker's Trust Account", in violation of Code Section 10145 and Regulation 2831. FSNGI did not maintain a columnar record for transactions where credit report fees and/or appraisal fees were collected.

(b) Failed to maintain a separate record, in violation of Code Section 10145 and Regulation 2831.1. FSNGI did not maintain a separate record for transactions for credit report fees and/or appraisal fees.

(c) Mixed and commingled trust funds and personal funds by depositing appraisal and credit report fees received from escrow into FSNGI's and/or MACK's general operating account, in violation of Code Sections 10145 and 10176(e).

1 (d) After notice and service of subpoena on July 10,  
2 2008, to FSGNI and to MACK in her individual capacity,  
3 Respondents failed to retain all records of their activity during  
4 the audit period requiring a real estate broker license, as  
5 required by Code Section 10148.

6 (e) Failed to disclose rebates from lenders in the form  
7 of yield spread premiums for borrowers Walder Settle and Elese  
8 Walker, in violation of Code Section 10176(g).

9 (f) Employed and compensated Juan Sopprani, as a loan  
10 agent who FSNGI and MACK knew was not licensed by the Department  
11 as a real estate broker or as a real estate salesperson employed  
12 by a real estate broker, for performing acts for which a real  
13 estate license is required, including soliciting and negotiating  
14 mortgage loans including but not limited to borrowers Campos,  
15 Covarrubias and Camacho/Frusto, in violation of Code Section  
16 10137. Between the period November 2006 to February 2007, Juan  
17 Sopprani worked out of FSNGI's former branch office located at  
18 7168 Archibald Avenue #250, Rancho Cucamonga, and conducted  
19 activities requiring a license therein; and  
20

21 (g) FSGNI continued to conduct operations from December  
22 3, 2007, to date, after suspension for non payment of franchise  
23 taxes by the California Secretary of State, in violation of Code  
24 Section 10177(f) and Regulation 2742(c).

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DISCIPLINE STATUTES AND REGULATIONS

8.

The conduct of Respondents FSGNI and MACK described in Paragraph 7, above, violated the Code and the Regulations as set forth below:

PARAGRAPH

PROVISIONS VIOLATED

7(a)

Code Section 10145 and Regulation  
2831

7(b)

Code Section 10145 and Regulation  
2831.1

7(c)

Code Sections 10145 and 10176(e)

7(d)

Code Section 10148

7(e)

Code Section 10176(g)

7(f)

Code Section 10137

7(g)

Code Section 10177(f) and  
Regulation 2742(c)

///

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1 The foregoing violations constitute cause for the suspension or  
2 revocation of the real estate license and license rights of  
3 Respondents FSNGI and MACK, under the provisions of Code  
4 Sections:

5 10137 for unlawful employment or payment of  
6 compensation.

7 10176(e) for trust fund mishandling and embezzlement.

8 10176(g) for undisclosed compensation

9 10177(d) for willful disregard or violation of the Real  
10 Estate Law

11 10177(f) for conducting themselves in a manner that  
12 would have warranted the denial of a real estate license has that  
13 conduct been performed by a real estate licensee; and/or,

14 10177(g) for negligence or incompetence.

15 SECOND CAUSE OF ACTION

16 Fraudulent Loan

17 7850 Marek Court, Fontana

18 9.

19  
20 The audit examination also discovered that on or about  
21 March 28, 2007, a fraudulent loan and deed of trust in the amount  
22 of \$170,000, was originated by unlicensed person Juan Sopprani,  
23 unlawfully employed by FSNGI and MACK, for homeowners and  
24 borrowers Juan/Graciella/Nicole Bravo ("Bravo") and placed upon  
25 their residence located at 7850 Marek Court, Fontana, in  
26  
27

1 violation of Code Sections 10176(i) for fraud and dishonest  
2 dealing, and/or 10177(g) for negligence, for FSNGI and MACK.

3 THIRD CAUSE OF ACTION

4 Equity Stripping and Predatory Lending Scheme

5 15333 Athol Street

6 10.

7 The audit examination also discovered that between  
8 November and December 2006, and continuing to date, FSNGI, MACK  
9 and ANDERSON operated a fraudulent equity-stripping scheme. The  
10 essential features of the predatory lending scheme involved:

11 A. On or around November 27, 2006, ostensibly to cure  
12 a pending default, ANDERSON made a default purchase of homeowner-  
13 borrower Efrain Cortez' ("Cortez") residence located at 15333  
14 Athol Street, Fontana for \$405,000.

15 B. Pursuant to the United States Department of Housing  
16 and Urban Development form ("HUD 1"), ANDERSON was required to  
17 make an earnest money deposit of \$40,500, to effect the purchase.

18 C. ANDERSON failed to make said \$40,500 deposit.

19 D. On or around December 4, 2006, FSNGI via MACK  
20 originated the refinance loan from lender New Century Mortgage  
21 Corporation, to complete the complete from sale of 15333 Athol  
22 Street from Cortez to ANDERSON.

23 E. The default sale of 15333 Athol Street from Cortez  
24 to ANDERSON was escrowed by and through All Cities Network Inc.,  
25 escrow division. Respondent MACK is the designated officer of  
26 All Cities Network Inc.  
27



1 F. Additionally, Cortez received from Respondents  
2 herein or their agents, a Property Guarantee Contract [from]  
3 Family Investors, guaranteeing the resale and re-transfer of the  
4 residence to Cortez after 12 months upon the condition that  
5 Cortez achieve a credit score above 620.

6 G. Family Investors, the guaranteeing entity, is an  
7 unlicensed entity owned in part and controlled by Respondents, or  
8 their agents.

9 H. As a result of the sale to ANDERSON, Cortez was to  
10 receive \$154,772.50, as seller net proceeds. Cortez received  
11 \$40,000 only, with the difference of \$114,772.50, due Cortez,  
12 paid to ANDERSON.

13 FOURTH CAUSE OF ACTION

14 DECEIT BY MISREPRESENTATION

15 Specific Allegations

16 11.

17 FSNGI, MACK and ANDERSON intentionally engaged in the  
18 conduct above set forth in Paragraphs 7, 8 9 and 10. In the  
19 alternative, FSNGI, MACK and ANDERSON engaged in negligent  
20 misrepresentation, in transactions for which real estate licenses  
21 are required, in violation of Code Sections 10176(a) and  
22 10176(i).  
23

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VIOLATIONS OF THE REAL ESTATE LAW

BY FSNGI, MACK AND ANDERSON

12.

A. Code Section 10176(a) for promising homeowner Efrain Cortez that he would receive \$154,772.50 as seller proceeds from his default sale to ANDERSON. Cortez actually received \$40,000.

B. Code Section 10176(b) for making false promises of a character likely to influence, persuade or induce Cortez, via the Property Guarantee Contract by Family Investors, to sell his residence to ANDERSON.

C. Code Section 10176(i) for conversion in connection with an ongoing equity-stripping predatory lending scheme for the purpose of converting Cortez' equity in his residence at 15333 Athol St. in the amount of \$114,772.50; and

D. Code Section 10177(g) for negligence in connection with an equity-stripping and predatory lending scheme.

ADDITIONAL VIOLATION OF THE REAL ESTATE LAW BY MACK

13.

MACK violated Code Section 10176(c) for making a continued and flagrant course of misrepresentations and/or false promises through real estate agents or salespersons including ANDERSON, with respect to the Efrain Cortez and Juan/Graciela Bravo real property transactions.

///

FIFTH CAUSE OF ACTION

NEGLIGENCE

14.

The overall conduct of Respondents FSNGI, MACK and ANDERSON constitutes negligence. This conduct is cause for the suspension or revocation of the real estate license and license rights of said Respondents pursuant to Code Section 10177(g).

SIXTH CAUSE OF ACTION

SUPERVISION

15.

The overall conduct of Respondent MACK constitutes a failure on Respondent's part, as officer designated by a corporate broker licensee, to exercise the reasonable supervision and control over the licensed activities of FSNGI as required by Code Section 10159.2 and Regulation 2725, and to keep FSNGI in compliance with the Real Estate Law, and is cause for the suspension or revocation of the real estate license and license rights of MACK pursuant to the provisions of Code Sections 10177(d), 10177(g) and 10177(h).

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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 FINANCIAL SERVICES NETWORK GROUP INC., JOYCE MARIE MACK and  
6 DIONDRA D. ANDERSON, under the Real Estate Law (Part 1 of  
7 Division 4 of the Business and Professions Code) and for such  
8 other and further relief as may be proper under other applicable  
9 provisions of law.

10 Dated at Los Angeles, California

11 this 3 day of February 2009 Robin Trujillo  
12 Deputy Real Estate Commissioner  
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23 cc: Financial Services Network Group Inc.  
24 c/o Joyce Marie Mack D.O.  
25 Diondra D. Anderson  
26 Robin Trujillo  
27 Sacto  
Audits - Surrender Bhatia