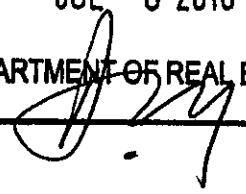


**FILED**

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

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  
26  
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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  
27



1 travel time to and from the auditor's place of work.

2 Respondent JOYCE MARIE MACK shall pay such cost within  
3 60 days of receiving an invoice from the Commissioner detailing  
4 the activities performed during the audit and the amount of time  
5 spent performing those activities.

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

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18 DATED: 4-7-10

EL  
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.  
4  
5  
6


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.

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.

22  
23  
24 DATED: 6-7-2010

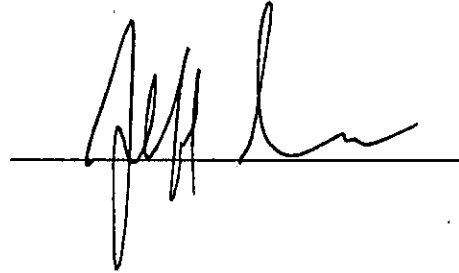
  
JACQUELINE STATEN, ESQ.  
Attorney for Respondents  
Approved as to form

\* \* \*

1                   The foregoing Stipulation and Agreement is hereby adopted  
2  
3 as my Decision as to Respondents FINANCIAL SERVICES NETWORK GROUP  
4 INC., ALL CITIES NETWORK INC. and JOYCE MARIE MACK and shall  
5 become effective at 12 o'clock noon on August 5, 2010.

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8 IT IS SO ORDERED 6/23, 2010.

9 JEFF DAVI  
10 Real Estate Commissioner

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*Sachs*

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)

**FILED**

MAR 24 2009

DEPARTMENT OF REAL ESTATE

BY: *[Signature]*

BEFORE THE DEPARTMENT OF REAL ESTATE

STATE OF CALIFORNIA

\* \* \*

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.,

FIRST AMENDED

ACCUSATION

Respondents.

The Accusation filed March 4, 2009 is amended in its  
entirety as follows:

The Complainant, Robin Trujillo, a Deputy Real Estate  
Commissioner of the State of California, for cause of Accusation  
against ALL CITIES NETWORK INC. and JOYCE MARIE MACK,  
individually and as designated officer of All Cities Network  
Inc., 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 ALL CITIES NETWORK INC. and JOYCE MARIE MACK.

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, ALL CITIES NETWORK INC. ("ACNI") 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, ACNI 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 ACNI of by ACNI's officers, agents and employees, including MACK. ACNI was originally licensed as a corporate real estate broker on September 20, 2005. MACK was initially licensed as a real estate broker on February

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

3 BROKERAGE

4 4.

5 At all times mentioned, in the City of Ontario, County  
6 of San Bernardino, ACNI acted as a real estate broker conducting  
7 licensed activities within the meaning of Code Section 10131(d)  
8 by operating a mortgage and loan brokerage.

9 FIRST CAUSE OF ACTION

10 AUDIT EXAMINATION

11 5.

12 On November 13, 2008, the Department attempted to audit  
13 the books and records of ACNI pertaining to the mortgage and loan  
14 activities described in Paragraph 4, which require a real estate  
15 license. The audit examination covered a period of time  
16 beginning on January 1, 2006 to June 30, 2008. The audit  
17 examination revealed a violation of the Code as set forth in the  
18 following paragraphs, and more fully discussed in Audit Report LA  
19 080007.  
20

21 TRUST ACCOUNT

22 6.

23 It is not known if ACNI maintained a trust account  
24 during the audit period.

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26 ///

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 ACNI and MACK, acted in violation of the Code and the Regulations in that:

(a) After notice and subpoena on July 9, 2008, failed to retain all records of ACNI's activity during the audit period requiring a real estate broker license, as required by Code Section 10148.

DISCIPLINE STATUTES AND REGULATIONS

8.

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

PARAGRAPH

PROVISIONS VIOLATED

7(a)

Code Section 10148

The foregoing violation constitutes cause for the suspension or revocation of the real estate license and license rights of ACNI and MACK, under the provisions of Code Sections 10177(d) for willful disregard or violation of the Real Estate Law.

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1 SECOND CAUSE OF ACTION  
2 FRAUD IN A CIVIL ACTION  
3 BUSINESS AND PROFESSIONS CODE 10177.5

4 9.

5 On or about May 4, 2006, in the Superior Court of the  
6 State of California, for the County of Los Angeles, in Case No.  
7 BC 315651, New Freedom Mortgage Corporation v. Online Financial  
8 Services Inc. Joyce Marie Mack, Joyce Parks, et al, a final  
9 judgment was entered against Respondent JOYCE MARIE MACK based on  
10 grounds of fraud, misrepresentation or deceit with reference to a  
11 transaction for which a real estate license is required.

12 10.

13 The facts set forth in Paragraph 9, above, constitute  
14 cause under Code Section 10177.5 of the Code for suspension or  
15 revocation of the license and license rights of Respondent under  
16 the Real Estate Law.

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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 ALL  
5 CITIES NETWORK INC. and JOYCE MARIE MACK, under the Real Estate  
6 Law (Part 1 of Division 4 of the Business and Professions Code)  
7 and for such other and further relief as may be proper under  
8 other applicable provisions of law.

9 Dated at Los Angeles, California

10 this 23 day of March 2009.

  
11 Deputy Real Estate Commissioner

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24 cc: All Cities Network Inc.  
25 c/o Joyce Marie Mack D.O.  
26 Robin Trujillo  
27 Sacto  
Audits - Surrender Bhatia

fact -  
1 ELLIOTT MAC LENNAN, SBN 66674  
Department of Real Estate  
2 320 West 4th Street, Ste. 350  
Los Angeles, California 90013-1105  
3  
4 Telephone: (213) 576-6911 (direct)  
-or- (213) 576-6982 (office)  
5  
6  
7

**FILED**

MAR - 4 2009

DEPARTMENT OF REAL ESTATE  
BY: Ally

8 BEFORE THE DEPARTMENT OF REAL ESTATE

9 STATE OF CALIFORNIA

10 \* \* \*

11 In the Matter of the Accusation of )

No. H- 35750 LA

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

A C C U S A T I O N

15 Respondents. )

16 The Complainant, Robin Trujillo, a Deputy Real Estate  
17 Commissioner of the State of California, for cause of Accusation  
18 against ALL CITIES NETWORK INC. and JOYCE MARIE MACK,  
19 individually and as designated officer of All Cities Network  
20 Inc., 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 ALL CITIES NETWORK INC. and JOYCE MARIE MACK.

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.

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3.

A. At all times mentioned, ALL CITIES NETWORK INC. ("ACNI") 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, ACNI 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 ACNI of by ACNI's officers, agents and employees, including MACK. ACNI was originally licensed as a corporate real estate broker on September 20, 2005. MACK was initially licensed as a real estate broker on February

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

3 BROKERAGE

4 4.

5 At all times mentioned, in the City of Ontario, County  
6 of San Bernardino, ACNI acted as a real estate broker conducting  
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9 AUDIT EXAMINATION

10 5.

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18 080007.  
19

20 TRUST ACCOUNT

21 6.

22 It is not known if ACNI maintained a trust account  
23 during the audit period.

24 ///

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VIOLETIONS 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 ACNI and MACK, acted in violation of the Code and the Regulations in that:

(a) After notice and subpoena on July 9, 2008, failed to retain all records of ACNI's activity during the audit period requiring a real estate broker license, as required by Code Section 10148.

DISCIPLINE STATUTES AND REGULATIONS

8.

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

PARAGRAPH

PROVISIONS VIOLATED

7(a)

Code Section 10148

The foregoing violation constitutes cause for the suspension or revocation of the real estate license and license rights of ACNI and MACK, under the provisions of Code Sections 10177(d) for willful disregard or violation of the Real Estate Law.

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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 ALL  
5 CITIES NETWORK INC. and JOYCE MARIE MACK, under the Real Estate  
6 Law (Part 1 of Division 4 of the Business and Professions Code)  
7 and for such other and further relief as may be proper under  
8 other applicable provisions of law.

9 Dated at Los Angeles, California

10 this 3 day of February 2009.   
11 Deputy Real Estate Commissioner

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23  
24 cc: All Cities Network Inc.  
25 c/o Joyce Marie Mack D.O.  
26 Robin Trujillo  
27 Sacto  
Audits - Surrender Bhatia