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| 2 | | DEPARTMENT OF REAL ESTATE |
| 4 | | By_C |
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| 8 | BEFORE THE DEPARTMENT C | OF REAL ESTATE |
| 9 | 9 STATE OF CALIFORNIA | |
| 10 | * * * | \ |
| | In the Matter of the Accusation of | No. H-37036 LA |
| 12 | GEORGE NICK STAVROS, doing business as Pyramid Realty and |) OAH NO. L-2011030496 |
| 14 | Pyramid Rlty Commercial & Invstmnts, |))) |
| 15 | Respondent. |) |
| 16 | | |
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| 20 | | |
| 21 | | |
| 22 | | of the Business and |
| 23 | | AND ADODAT NTAK |
| 24 | | - |
| 25 | | |
| 26 | broker license is accepted as of the | effective date of this |
| 27 | | |
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Order as set forth below, based upon the understanding and agreement expressed in Respondent's Declaration dated September 20, 2011 (attached as Exhibit "A" hereto). Respondent's license certificate, pocket card and any branch office license certificates shall be sent to the below listed address so that they reach the Department on or before the effective date of this Order: Department of Real Estate Atten: Licensing Flag Section P.O. Box 187000 Sacramento, CA 95818-7000 This Order shall become effective at 12 o'clock noon November 8, 2011. on DATED: BARBARA J. BIGBY Acting Real Estate Commissioner

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| | Exhibit "A |
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| BEFORE THE DEPA | ARTMENT OF REAL ESTATE |
| STATE | OF CALIFORNIA |
| | * * *) |
| In the Matter of the Accusati | on of) No. H-37036 LA |
| GEORGE NICK STAVROS, doing business as Pyramid Realty Pyramid Rlty Commercial & Invstmnts, | |
| Respond | lent. |
| DE | ECLARATION |
| My name is GEORGE N | NICK STAVROS, and I am currently |
| | oker and/or have license rights wit |
| | am representing myself in this |
| matter. | |
| | ing in this matter in accordance |
| with the provisions of the A | |
| | the Government Code), I wish to |
| | |
| | al estate license issued by the |
| | Department"), pursuant to Business |
| and Professions Code Section | 1 10100.2. |
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I understand that by so voluntarily surrendering my license, I may be relicensed as a broker or as a salesperson only by petitioning for reinstatement pursuant to Section 11522 of the Government Code. I also understand that by so voluntarily surrendering my license, I agree to the following:

6 1. The filing of this Declaration shall be deemed as 7 my petition for voluntary surrender.

It shall also be deemed to be an understanding 8 2. and agreement by me that I waive all rights I have to require 9 the Commissioner to prove the allegations contained in the First 10 Amended Accusation filed in this matter at a hearing held in 11 accordance with the provisions of the Administrative Procedure 12 Act (Government Code Sections 11400 et seq.), and that I also 13 waive other rights afforded to me in connection with the hearing 14 such as the right to discovery, the right to present evidence in 15 defense of the allegations in the First Amended Accusation and 16 the right to cross-examine witnesses. 17

I further agree that upon acceptance by the 3. 18 Commissioner, as evidenced by an appropriate order, all 19 affidavits and all relevant evidence obtained by the Department 20 in this matter prior to the Commissioner's acceptance, and all 21 allegations contained in the Accusation filed in the Department 22 Case No. H-37036 LA, may be considered by the Department to be 23 true and correct for the purpose of deciding whether to grant 24 relicensure or reinstatement pursuant to Government Code Section 25 26 11522.

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14. I freely and voluntarily surrender all my2licenses and license rights under the Real Estate Law.

A copy of the Commissioner's Criteria of 3 5. Rehabilitation is attached hereto. If and when a petition 4 application is made for reinstatement of a surrendered license, 5 the Real Estate Commissioner will consider as one of the 6 criteria of rehabilitation, whether or not restitution has been 7 made to any person who has suffered monetary losses through 8 "substantially related" acts or omissions of Respondent, whether 9 or not such persons are named in the Accusation filed in this 10 11 case.

I declare under penalty of perjury under the laws of the State of California that the above is true and correct and that this declaration was executed on $\underline{\leq EPT 20}$, 2011, at Los Angeles, California.

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GEORGE NICK STAVROS

| 1 2 3 4 5 6 | LISSETE GARCIA, Counsel (SBN 211552) Department of Real Estate 320 West 4th Street, Suite 350 Los Angeles, California 90013-1105 Telephone: (213) 576-6982 (Direct) (213) 576-6914 By |
|--|---|
| 7 | |
| 8 | BEFORE THE DEPARTMENT OF REAL ESTATE |
| 9 | STATE OF CALIFORNIA |
| 10 | * * * |
| 11 | In the Matter of the Accusation of) No. H-37036 LA |
| 12 13 14 | GEORGE NICK STAVROS, doing) <u>FIRST AMENDED</u> business as Pyramid Realty and) <u>ACCUSATION</u> Pyramid Rlty Commercial &) Invstmnts, |
| 15 | Respondent. |
| 16 17 18 19 20 21 22 23 24 25 26 | This First Amended Accusation amends the Accusation filed on January 27, 2011. The Complainant, Robin Trujillo, a Deputy Real Estate Commissioner of the State of California, for cause of Accusation against GEORGE NICK STAVROS, doing business as Pyramid Realty and Pyramid Rlty Commercial & Invstmnts, alleges as follows: 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 GEORGE NICK STAVROS. |
| 26 | 2. |
| 27 | - 1 - |

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All references to the "Code" are to the California 1 Business and Professions Code and all references to "Regulations" 2 are to Title 10, Chapter 6, California Code of Regulations. 3 3. 4 At all times mentioned, GEORGE NICK STAVROS. Α. 5 ("STAVROS") was licensed or had license rights issued by the 6 Department of Real Estate ("Department") as a real estate broker. 7 On January 15, 1970, STAVROS was originally licensed as a real 8 estate broker. STAVROS is licensed to do business as Pyramid 9 Realty and Pyramid Rlty Commercial & Investmnts, among other 10 fictitious business names. On February 22, 2010, STAVROS' real 11 estate broker license expired. On May 20, 2010, STAVROS' real

BROKERAGE

4.

At all times mentioned, in California, STAVROS acted as 16 a real estate broker and conducted licensed activities within the 17 meaning of: 18

STAVROS operated a A. Code Section 10131(a). 19 residential resale brokerage. 20

estate broker license was renewed.

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B. Code Section 10131(d). STAVROS operated a mortgage 21 and loan brokerage; and 22

In addition, STAVROS conducted broker-controlled с. 23 escrows through its escrow division, under the exemption set 24 forth in California Financial Code Section 17006(a)(4) for real 25 estate brokers performing escrows incidental to a real estate 26 transaction where the broker was a party and where the broker was 27

| 1 | performing acts for which a real estate license is required. |
|----|---|
| 2 | FIRST CAUSE OF ACCCUSATION (Audit) |
| 3 | 5. |
| 4 | |
| 5 | On July 7, 2010, the Department completed an audit |
| 6 | examination of the books and records of STAVROS, Pyramid Realty |
| 7 | and Pyramid Rlty Commercial & Invstmnts pertaining to the (1) |
| 8 | residential resale (2) mortgage loan and (3) broker-escrow |
| 9 | activities described in Paragraph 4, which require a real estate |
| 10 | license. The audit examination covered a period of time |
| 11 | beginning on July 1, 2007 to March 31, 2010. The audit |
| 12 | examination revealed violations of the Code and the Regulations |
| 13 | as set forth in the following paragraphs, and more fully |
| 14 | discussed in Audit Report LA 090204 and the exhibits and work |
| 15 | papers attached to said Audit Report. |
| 16 | TRUST ACCOUNT |
| | 6. |
| 17 | At all times mentioned, in connection with the |
| 18 | activities described in Paragraph 4, above, STAVROS accepted or |
| 19 | received funds including funds in trust ("trust funds") from or |
| 20 | on behalf of actual or prospective parties to transactions |
| 21 | including buyers, sellers, lenders and borrowers handled by |
| 22 | STAVROS and thereafter made deposits and or disbursements of such |
| 23 | funds. From time to time herein mentioned during the audit |
| 24 | period, said trust funds were deposited and/or maintained by |
| 25 | |
| 26 | STAVROS in the bank accounts as follow: |
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"George N. Stavros dba Pyramid Realty Trust Account 1 ("escrow trust account") 5180033795" Union Bank 2 Los Angeles, California ("B/A #1") 3 "George N. Stavros dba Pyramid Realty 4 ("business checking account") 09424-61490" Bank of America 5 San Francisco, California ("B/A #2") 6 VIOLATIONS OF THE REAL ESTATE LAW 7 7. 8 In the course of activities described in Paragraphs 4 9 and 6, above, and during the examination period described in 10 Paragraph 5, Respondent STAVROS, acted in violation of the Code 11 and the Regulations in that he: 12 Permitted, allowed or caused the disbursement of (a) 13 trust funds from the escrow trust account, where the disbursement 14 of funds reduced the total of aggregate funds in the escrow trust 15 account, to an amount which, on March 31, 2010, was \$110.41, less 16 than the existing aggregate trust fund liability of STAVROS to 17 every principal who was an owner of said funds, without first 18 obtaining the prior written consent of the owners of said funds, 19 as required by Code Section 10145 and Regulations 2832.1 and 20 2951. The shortage was caused by a bank auto debit. 21 Failed to deposit escrow funds into a trust fund (b) 22 account as required by Code Section 10145 Regulation 2832 and 23 refund a deposit balance of \$2,005 to borrower Michelle Duran 24 upon cancellation of escrow on or about May 14, 2008, regarding 25 the purchase of real property located at 8638 Grand Avenue, 26 Rosemead, California 91770. 27

- 4 -

(c) Failed to maintain an accurate and complete
 control record in the form of a columnar record in chronological
 order of all trust funds received, deposited and disbursed by the
 escrow trust account, in violation of Code Section 10145 and
 Regulations 2831 and 2951.

6 (d) Failed to maintain a separate record for each 7 beneficiary or transaction, thereby failing to account for all 8 advance fees collected, in violation of Code Section 10145 and 9 Regulations 2831.1 and 2951.

(e) Failed to maintain the original license of some of
his real estate salespersons at his main office, in violation of
Code Section 10160 and Regulation 2753.

(f) Failed to maintain broker-salesperson relationship
 agreements with some real estate salespersons licensed under his
 employment or supervision, as required by Regulation 2726.

(g) Conducted unlicensed real estate activities from
February 23, 2010 through May 19, 2010, in violation of Code
Section 10130.

(h) Failed to retain all records of activities
requiring a real estate broker license during the past three
years including sales, escrow and loan transaction files for
STAVROS' real estate clients, in violation of Code Section 10148.

(i) Failed to exercise reasonable supervision and
control over the escrow activities of Pyramid Realty to keep in
compliance with the Real Estate Law, in violation of Regulation
2725.

- 5 -

| 1 | | 8. |
|----------|------------------------------|--|
| 2 | The conduct of Resp | pondent STAVROS, described in |
| 3 | Paragraph 7, above, violated | the Code and the Regulations as set |
| 4 | forth below: | |
| 5 | PARAGRAPH | PROVISIONS VIOLATED |
| 6 | 7(a) | Code Section 10145 and Regulations 2832.1 and 2951 |
| 7 8 | 7 (b) | Code Section 10145 and Regulation 2832 |
| 9 10 | 7(c) | Code Section 10145 and Regulations 2831 and 2951 |
| 11 | 7 (d) | Code Section 10145 and Regulations 2831.1 and 2951 |
| 12 13 | 7(e) | Code Section 10160 and Regulation 2753 |
| 14 | 7(f) | Regulation 2726 |
| 15 | 7(g) | Code Section 10130 |
| 16 | 7(h) | Code Section 10148 |
| 17 18 | 7(i) | Regulation 2725 |
| 19 | | |
| 20 | | ations constitute cause for the |
| 21 | | the real estate licenses and license |
| 22 | - | under the provisions of Code |
| 23 | Sections 10177(d) and/or 101 | |
| 24 | | 9. |
| 25 | l f | t of Respondent STAVROS constitutes |
| 26 | | This conduct and violations are |
| 27 | cause for the suspension or | revocation of the real estate |
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- 6 -

| 1 | licenses and license rights of Respondent STAVROS pursuant to | |
|----|--|---|
| 2 | Code Section 10177(g). | |
| 3 | SECOND CAUSE OF ACCUSATION | |
| 4 | (Trust Fund Handling/Commingling/Dishonest Dealing) | |
| 5 | 10. | |
| 6 | There is hereby incorporated in this Second, separate | |
| 7 | Cause of Accusation, all of the allegations contained in Paragraphs 1 through 9, above, with the same force and effect as | |
| 8 | if herein fully set forth. | |
| 9 | 11. | |
| 10 | In May, 2009, Pyramid Realty represented both the | |
| 11 | | |
| 12 | purchaser and seller for the sale of real property located at | |
| 13 | 1220 North Hidalgo Avenue, Alhambra, California 91801 ("North | |
| 14 | Hidalgo Avenue property"). Pyramid Realty Escrow Division | |
| 15 | handled the escrow for the sale transaction of the North Hidalgo | |
| 16 | Avenue Property. Pyramid Realty Escrow Division was owned and | |
| 17 | operated by Respondent. The sellers of the Hidalgo Avenue | |
| 18 | property, Armando De La Torre and Claudia De La Torre, were in | |
| 19 | the process of dissolution of their marriage. | |
| | 12. | |
| 20 | On May 18, 2009, Claudia De La Torre received a letter | |
| 21 | from Pyramid Realty acknowledging that escrow closed on the sale | |
| 22 | of the North Hidalgo Avenue property on May 14, 2009 (Escrow No. | |
| 23 | 090001-TP) and that Pyramid Realty Escrow Division would maintain | L |
| 24 | the sale proceeds of the North Hidalgo Avenue property in a trust | |
| 25 | fund account for a period of up to five years or until written | |
| 26 | instructions for disbursement were provided by the sellers or | |
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1 their attorneys.

13.
On September 8, 2010, Claudia De La Torre's attorney
provided written notification to Pyramid Realty Escrow Division
that a settlement had been reached between Claudia and Armando De
La Torre and pursuant to that settlement Pyramid Realty Escrow
Division needed to disburse the sum of \$57,225.48 to Claudia De
La Torre.

On September 10, 2010, Respondent signed a statement at Respondent, as owner of Pyramid Realty Escrow

14.

noting that Respondent, as owner of Pyramid Realty Escrow 11 Division, failed to disburse the trust funds in the amount of 12 \$57,225.48 to Claudia De La Torre due to insufficient funds in 13 the escrow account. Respondent agreed to pay \$57,225.38 plus 14 interest of \$1,536.46 to Claudia De La Torre by September 17, 15 2010. In addition, Respondent agreed to pay an additional \$350 16 for Claudia De La Torre's attorney's fee. The total sum of 17 \$59,111.94 was owed by Respondent and due on or before September 18 17, 2010. 19

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15.

Respondent failed to pay the \$59,111.94 to Claudia De La Torre by September 17, 2010. On November 8, 2010, Respondent executed a note secured by a deed of trust on his own real property located at 1217 North Hidalgo Avenue, Alhambra, California, whereby Respondent promised to pay \$59,111.34 to Claudia De La Torre by November 8, 2010. Respondent never paid Claudia De La Torre any of the trust funds owed to her from the

- 8 -

1 sale of the North Hidalgo Avenue property.

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| 2 | 16. |
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| 3 | The conduct, acts and/or omissions of Respondent as set |
| 4 | forth in Paragraphs 11 through 15, above, of misappropriating and |
| 5 | commingling trust funds, failing to maintain trust funds |
| 6 | belonging to another in connection with a real estate transaction |
| 7 | and failing to disburse the funds in accordance to instructions |
| 8 | from the person entitled to the funds, is in violation of Code |
| 9 | Section 10145(a) and constitutes cause for the suspension or |
| 10 | revocation of the licenses and license rights of Respondent |
| 11 | pursuant to Code Sections 10176(e) and/or 10176(i). |
| 12 | WHEREFORE, Complainant prays that a hearing be |
| 13 | conducted on the allegations of this Accusation and that upon |
| | proof thereof, a decision be rendered imposing disciplinary |
| 14 | action against the license and license rights of Respondent |
| 15 | GEORGE NICK STAVROS, under the Real Estate Law (Part 1 of |
| 16 | Division 4 of the Business and Professions Code) and for such |
| 17 | other and further relief as may be proper under other applicable |
| 18 | provisions of law. |
| 19 | Dated at Los Angeles, California |
| 20 | this <u>7</u> day of <u>March</u> , 2011. |
| 21 | $\partial \overline{\partial}$ |
| 22 | Sel rupielo |
| 23 | ROBIN TRUJILLO () Deputy Real Estate Commissioner |
| 24 | Deputy Real Estate Commissioner |
| 25 | cc: George Nick Stavros |
| 26 | Robin Trujillo Justin Park, L.A. Audits |
| 27 | Sacto |
| | · _ 9 _ |
| | |

| 1 2 3 4 | LISSETE GARCIA, Counsel (SBN 211552) Department of Real Estate 320 West 4th Street, Suite 350 Los Angeles, California 90013-1105 Telephone: (213) 576-6982 (Direct) (213) 576-6914 |
|------------------|---|
| 5 | |
| 8 | BEFORE THE DEPARTMENT OF REAL ESTATE |
| 10 | STATE OF CALIFORNIA |
| 11 |) In the Matter of the Accusation of) No. H-37036 LA |
| 12 | GEORGE NICK STAVROS, doing) $\underline{A} \subseteq \underline{C} \sqcup \underline{S} \underline{A} \perp \underline{I} \supseteq \underline{N}$ |
| 13 14 | business as Pyramid Realty and) Pyramid Rlty Commercial &) Invstmnts, |
| 15 | Respondent. |
| 16 | |
| 17 | The Complainant, Robin Trujillo, a Deputy Real Estate |
| 18 | Commissioner of the State of California, for cause of Accusation |
| 19 | against GEORGE NICK STAVROS, doing business as Pyramid Realty and |
| 20 | Pyramid Rlty Commercial & Invstmnts, alleges as follows: |
| 21 | 1. |
| 22 | The Complainant, Robin Trujillo, acting in her official |
| 23 24 | capacity as a Deputy Real Estate Commissioner of the State of |
| 25 | California, makes this Accusation against GEORGE NICK STAVROS. |
| 26 | |
| 27 | /// |
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2. 1 All references to the "Code" are to the California 2 Business and Professions Code and all references to "Regulations" 3 are to Title 10, Chapter 6, California Code of Regulations. 4 3. 5 At all times mentioned, GEORGE NICK STAVROS. Α. 6 ("STAVROS") was licensed or had license rights issued by the 7 Department of Real Estate ("Department") as a real estate broker. 8 On January 15, 1970, STAVROS was originally licensed as a real 9 estate broker. STAVROS is licensed to do business as Pyramid 10 Realty and Pyramid Rlty Commercial & Investmnts, among other 11 fictitious business names. On February 22, 2010, STAVROS' real 12 estate broker license expired. On May 20, 2010, STAVROS' real 13 estate broker license was renewed. 14 BROKERAGE 15 4. 16 At all times mentioned, in California, STAVROS acted as 17 a real estate broker and conducted licensed activities within the 18 meaning of: 19 A. Code Section 10131(a). STAVROS operated a 20 residential resale brokerage. 21 B. Code Section 10131(d). STAVROS operated a mortgage 22 and loan brokerage; and 23 С. In addition, STAVROS conducted broker-controlled 24 escrows through its escrow division, under the exemption set 25 forth in California Financial Code Section 17006(a)(4) for real 26 estate brokers performing escrows incidental to a real estate 27

- 2 -

1 transaction where the broker was a party and where the broker was 2 performing acts for which a real estate license is required.

FIRST CAUSE OF ACTION (Audit)

5.

On July 7, 2010, the Department completed an audit 6 examination of the books and records of STAVROS, Pyramid Realty 7 and Pyramid Rlty Commercial & Invstmnts pertaining to the (1) 8 residential resale (2) mortgage loan and (3) broker-escrow 9 activities described in Paragraph 4, which require a real estate 10 The audit examination covered a period of time license. 11 beginning on July 1, 2007 to March 31, 2010. The audit 12 examination revealed violations of the Code and the Regulations 13 as set forth in the following paragraphs, and more fully 14 discussed in Audit Report LA 090204 and the exhibits and work 15 papers attached to said Audit Report. 16 TRUST ACCOUNT 17 6. 18 At all times mentioned, in connection with the 19 activities described in Paragraph 4, above, STAVROS accepted or 20 received funds including funds in trust ("trust funds") from or 21 on behalf of actual or prospective parties to transactions 22 including buyers, sellers, lenders and borrowers handled by 23 STAVROS and thereafter made deposits and or disbursements of such 24 funds. From time to time herein mentioned during the audit 25 period, said trust funds were deposited and/or maintained by

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STAVROS in the bank accounts as follow:

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"George N. Stavros dba Pyramid Realty Trust Account ("escrow trust account") 5180033795" 1 Union Bank 2 Los Angeles, California ("B/A #1") 3 "George N. Stavros dba Pyramid Realty 4 ("business checking account") 09424-61490" Bank of America 5 San Francisco, California ("B/A #2") 6 VIOLATIONS OF THE REAL ESTATE LAW 7 7. 8 In the course of activities described in Paragraphs 4 9 and 6, above, and during the examination period described in 10 Paragraph 5, Respondent STAVROS, acted in violation of the Code 11 and the Regulations in that he: 12 Permitted, allowed or caused the disbursement of (a) 13 trust funds from the escrow trust account, where the disbursement 14 of funds reduced the total of aggregate funds in the escrow trust 15 account, to an amount which, on March 31, 2010, was \$110.41, less 16 than the existing aggregate trust fund liability of STAVROS to 17 every principal who was an owner of said funds, without first 18 obtaining the prior written consent of the owners of said funds, 19 as required by Code Section 10145 and Regulations 2832.1 and 20 The shortage was caused by a bank auto debit. 2951. 21 Failed to deposit escrow funds into a trust fund (b) 22 account as required by Code Section 10145 Regulation 2832 and 23 refund a deposit balance of \$2,005 to borrower Michelle Duran 24 upon cancellation of escrow on or about May 14, 2008, regarding 25 the purchase of real property located at 8638 Grand Avenue, 26 Rosemead, California 91770. 27

(c) Failed to maintain an accurate and complete
control record in the form of a columnar record in chronological
order of all trust funds received, deposited and disbursed by the
escrow trust account, in violation of Code Section 10145 and
Regulations 2831 and 2951.

(d) Failed to maintain a separate record for each
beneficiary or transaction, thereby failing to account for all
advance fees collected, in violation of Code Section 10145 and
Regulations 2831.1 and 2951.

(e) Failed to maintain the original license of some of
his real estate salespersons at his main office, in violation of
Code Section 10160 and Regulation 2753.

(f) Failed to maintain broker-salesperson relationship
 agreements with some real estate salespersons licensed under his
 employment or supervision, as required by Regulation 2726.

(g) Conducted unlicensed real estate activities from
February 23, 2010 through May 19, 2010, in violation of Code
Section 10130.

(h) Failed to retain all records of activities
requiring a real estate broker license during the past three
years including sales, escrow and loan transaction files for
STAVROS' real estate clients, in violation of Code Section 10148.

(i) Failed to exercise reasonable supervision and
 control over the escrow activities of Pyramid Realty to keep in
 compliance with the Real Estate Law, in violation of Regulation
 2725.

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8.

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The conduct of Respondent STAVROS, described in 1 Paragraph 7, above, violated the Code and the Regulations as set 2 forth below: 3 4 PROVISIONS VIOLATED PARAGRAPH 5 Code Section 10145 and Regulations 7(a) 2832.1 and 2951 6 Code Section 10145 and Regulation 7(b) 7 2832 8 Code Section 10145 and Regulations 7(c) 2831 and 2951 9 Code Section 10145 and Regulations 7(d) 10 2831.1 and 2951 11 Code Section 10160 and Regulation 7(e) 12 2753 13 Regulation 2726 7(f) 14 Code Section 10130 7(g) 15 Code Section 10148 7(h) 16 Regulation 2725 7(i) 17 18 The foregoing violations constitute cause for the 19 suspension or revocation of the real estate licenses and license 20 rights of Respondent STAVROS under the provisions of Code 21 Sections 10177(d) and/or 10177(g). 22 9. 23 The overall conduct of Respondent STAVROS constitutes 24 negligence or incompetence. This conduct and violations are 25 cause for the suspension or revocation of the real estate 26 licenses and license rights of Respondent STAVROS pursuant to 27 - 6 -

Code Section 10177(g). 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 Respondent 5 GEORGE NICK STAVROS, under the Real Estate Law (Part 1 of б Division 4 of the Business and Professions Code) and for such 7 other and further relief as may be proper under other applicable 8 provisions of law. 9 Dated at Los Angeles, California 10 20 day of January 2011. this 11 12 13 14 Deputy Real Estate Commissioner 15 16 17 18 19 20 21 22 George Nick Stavros cc: 23 Robin Trujillo Justin Park, L.A. Audits 24 Sacto 25 26 27