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DEC 29 2011

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2 Department of Real Estate
3 320 West Fourth Street, Suite 350
4 Los Angeles, CA 90013-1105

DEPARTMENT OF REAL ESTATE
BY: *[Signature]*

5 Telephone: (213) 576-6982
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7

8 BEFORE THE DEPARTMENT OF REAL ESTATE
9 STATE OF CALIFORNIA

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11 In the Matter of the Accusation of) No. H-37772 LA
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Respondents.

28 The Complainant, Maria Suarez, a Deputy Real Estate
29 Commissioner of the State of California, for cause of accusation
30 against BROKER SOLUTIONS, INC., and VINCENT THEODORE PAGLIA
31 individually and as designated officer of the corporation,
32 alleges as follows:

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1 1. The Complainant, Maria Suarez, acting in her
2 official capacity as a Deputy Real Estate Commissioner of the
3 State of California, makes this Accusation against BROKER
4 SOLUTIONS, INC., and VINCENT THEODORE PAGLIA.

5 2. BROKER SOLUTIONS, INC., and VINCENT THEODORE PAGLIA
6 (hereinafter referred to as "Respondents") are presently licensed
7 and/or have license rights under the Real Estate Law (Part 1 of
8 Division 4 of the Business and Professions Code, hereinafter
9 Code).

10 3. At all times herein mentioned, Respondent BROKER
11 SOLUTIONS, INC. was licensed as a real estate broker with
12 Respondent VINCENT THEODORE PAGLIA as its designated officer.

13 4. At all times material herein, Respondents engaged
14 in the business of, acted in the capacity of, advertised or
15 assumed to act as a real estate broker in the State of California
16 within the meaning of Section 10131(d) of the Code, including
17 soliciting and negotiating loans and loan modifications on real
18 property.

19 5. On or about April 29, 2011, the Department
20 completed an examination of Respondent BROKER SOLUTIONS, INC.'s
21 books and records, pertaining to the activities described in
22 Paragraph 4 above, covering a period from September 1, 2007,
23 through August 31, 2010, which examination revealed violations of
24 the Code and of Title 10, Chapter 6, California Code of
25 Regulations (hereinafter Regulations) as set forth below.
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1 6. The examination described in Paragraph 5, above,
2 determined that, in connection with the activities described in
3 Paragraph 4 above, Respondent accepted or received funds,
4 including funds in trust (hereinafter "trust funds") from or on
5 behalf of principals, and thereafter made deposit or disbursement
6 of such funds.

7 7. In the course of activities described in Paragraph
8 4 and during the examination period described in Paragraph 5,
9 Respondents BROKER SOLUTIONS, INC., and VINCENT THEODORE PAGLIA
10 acted in violation of the Code and the Regulations as follows,
11 and as more specifically set forth in Audit Report No. LA 090188
12 and related exhibits:

13 a. Violated Section 10176(e) of the Code and
14 Regulations 2832 and 2835 by collecting advance fees which were
15 deposited and commingled with funds in the business account.
16 Respondent failed to place such funds into a trust account.

17 b. Violated Section 10145 of the Code and Regulation
18 2831 by not maintaining a record of all trust funds received and
19 disbursed in connection with advance fees collected from
20 borrowers.

21 c. Violated Section 10145 of the Code and Regulation
22 2831.2 by not maintaining a monthly reconciliation of the
23 columnar record with separate records.

24 d. Violated Section 10145 of the Code and Regulation
25 2834 as the designated officer was not a signatory on the trust
26 account. Unlicensed persons were signatories without proper
27 fidelity bond coverage with no deductible.

1 e. Violated Code Section 10085 Regulation 2970 by not
2 submitting to the Department of Real Estate for its review and
3 approval all Advance Fee Agreements and Materials.

4 f. Violated Code Section 10146 and Regulation 2972 by
5 not providing the borrowers with the required itemized
6 accounting.

7 g. Violated Regulation Code Section 10177(g) by
8 charging borrowers credit report fees more than the actual
9 billing for the fees.

10 h. Violated Code Section 10161.8 and Regulation 2752
11 by not notifying the Department of Real Estate within five days
12 of the employment of new salespersons.

13 i.. Violated Code Section 10160 and Regulation 2753 by
14 not maintaining possession of all salesperson license
15 certificates.

16 8. The conduct of Respondents BROKER SOLUTIONS, INC.,
17 and VINCENT THEODORE PAGLIA, as alleged above, subjects their
18 real estate licenses and license rights to suspension or
19 revocation pursuant to Sections 10177(d) and/or 10177(g) of the
20 Code, and Section 10176(e) of the Code.

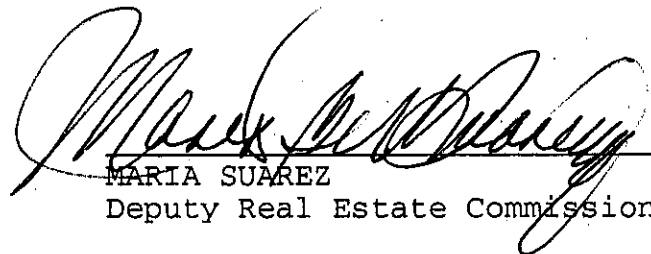
21 9. The conduct of Respondent VINCENT THEODORE PAGLIA,
22 as alleged above, is in violation of Code Section 10159.2 and
23 Regulation 2725 and subjects his real estate licenses and license
24 rights to suspension or revocation pursuant to Sections 10177(d),
25 10177(g), and 10177(h) of the Code.

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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 license rights of Respondents
5 BROKER SOLUTIONS, INC., and VINCENT THEODORE PAGLIA individually
6 and as designated officer of Broker Solutions, Inc., under the
7 Real Estate Law (Part 1 of Division 4 of the Business and
8 Professions Code) and for such other and further relief as may be
9 proper under other applicable provisions of law.

10 Dated at Los Angeles, California
11 this 2nd day of December, 2011.

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15 MARIA SUAREZ
16 Deputy Real Estate Commissioner
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20 cc: Broker Solutions, Inc.
21 Vincent Theodore Paglia
22 Maria Suarez
23 Sacto.
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