

FILED

SEP 19 2014

BUREAU OF REAL ESTATE

By *C. J. Jullery*

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8 BEFORE THE BUREAU OF REAL ESTATE

9 STATE OF CALIFORNIA

10 * * *

11	In the Matter of the Accusation of)	No. H- 39602 LA
12	EMPIRE REALITY CO.; and)	
13	ROB M. SCHULTZ, individually)	<u>ACCUSATION</u>
14	and as designated officer)	
15	of Empire Reality Co.,)	
)	
	Respondents.)	

16
17 The Complainant, Maria Suarez, a Deputy Real Estate
18 Commissioner of the State of California for cause of Accusation
19 against Respondents EMPIRE REALITY CO. ("ERC") and ROB M.
20 SCHULTZ aka Robbie Schultz ("SCHULTZ"), individually and as
21 designated officer of Empire Realty Co. is informed and alleges
22 as follows:

23 1.

24 The Complainant, Maria Suarez, a Deputy Real Estate
25 Commissioner of the State of California, makes this Accusation
26 in her official capacity.

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1 2.

2 All references to the "Code" are to the California
3 Business and Professions Code, and all references to
4 "Regulations" are to Title 10, Chapter 6, California Code of
5 Regulations unless otherwise specified.

6 3.

7 A. EMPIRE REALITY CO.: From or about July 20, 2010
8 to or about July 19, 2014, Respondent ERC was licensed or had
9 license rights under the Real Estate Law (Part 1 of Division 4
10 of the California Business and Professions Code) as a real
11 estate corporation. Respondent ERC's license expired on July
12 19, 2014. The Bureau of Real Estate retains jurisdiction over
13 the suspended license pursuant to Code section 10103.

14 B. ROB M. SCHULTZ: From or about March 6, 1997
15 through the present, Respondent SCHULTZ was and still is
16 licensed and/or has license rights under the Real Estate Law as
17 a real estate broker. At all times, Respondent ERC was
18 authorized to act by and through Respondent SCHULTZ as its
19 designated broker and officer who is responsible for ensuring
20 compliance with the Real Estate Law pursuant to Code sections
21 10159.2 and 10211.

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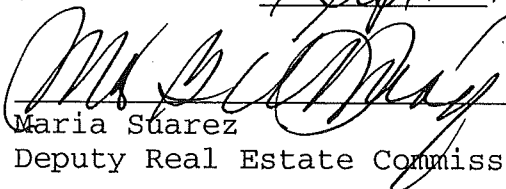
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1 and employees as required by Code section 10159.2 and Regulation
2 2725, and is cause to suspend or revoke the real estate license
3 and license rights of Respondent SCHULTZ pursuant to Code
4 sections 10177(d) and/or 10177(g) and 10177(h).

5 Code section 10106 provides, in pertinent part, that
6 in any order issued in resolution of a disciplinary proceeding
7 before the bureau, the Commissioner may request the
8 administrative law judge to direct a licensee found to have
9 committed a violation of this part to pay a sum not to exceed
10 the reasonable costs of investigation and enforcement of the
11 case.

12 WHEREFORE, Complainant prays that a hearing be
13 conducted on the allegations of this Accusation and that upon
14 proof thereof, a decision be rendered imposing disciplinary
15 action against all licenses and/or license rights under the Real
16 Estate Law (Part 1 of Division 4 of the California Business and
17 Professions Code) of Respondent EMPIRE REALITY CO. and ROB M.
18 SCHULTZ, individually and as designated officer of Empire
19 Reality Co. for the cost of investigation and enforcement as
20 permitted by law, and for such other and further relief as may
21 be proper under applicable provisions of law.

22 Dated at Los Angeles, California: 9 Sept., 2014.

23
24 
25 Maria Suarez
26 Deputy Real Estate Commissioner

25 cc: Empire Reality Co.
26 Rob M. Schultz
27 Maria Suarez
Sacto.