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Bureau of Real Estate  
320 West Fourth Street, #350  
Los Angeles, California 90013  
  
(213) 576-6982

**FILED**

**JUN 29 2018**

**BUREAU OF REAL ESTATE**

By *Agnes Danner*

**BEFORE THE BUREAU OF REAL ESTATE  
STATE OF CALIFORNIA**

\*\*\*

In the Matter of the Accusation of

No. H-40763 LA

**HAMID SOROUDI;**

**CHARLES DUNN COMPANY INC;**

**PATRICK JOSEPH CONN, designated  
Officer of Charles Dunn Company Inc; and**

**DARRELL RENDEL LEVONIAN.**

**STIPULATION AND AGREEMENT**

**Respondents.**

It is hereby stipulated by and between Respondents CHARLES DUNN COMPANY INC ("CDC"), PATRICK JOSEPH CONN ("CONN") and DARRELL RENDEL LEVONIAN, all represented by Frank M. Buda, Esq./The Law Offices of Frank Buda, and the Complainant, acting by and through Julie L. To, Counsel for the Bureau of Real Estate:

1           1. This Stipulation is made for the purpose of reaching an agreed disposition of  
2 this proceeding and is expressly limited to this proceeding and any other proceeding or case in  
3 which the Bureau of Real Estate ("Bureau") or another licensing agency of this state, another  
4 state or if the federal government is involved, and otherwise shall not be admissible in any other  
5 criminal or civil proceeding.

6           2. It is understood by the parties that the Real Estate Commissioner may adopt  
7 this Stipulation and Agreement as his Decision in this matter, thereby imposing the penalty and  
8 sanctions on Respondents' real estate licenses and license rights as set forth in the below  
9 "Order." In the event that the Commissioner in his discretion does not adopt this Stipulation  
10 and Agreement, this Stipulation shall be void and of no effect, and Respondents CDC, CONN  
11 and LEVONIAN shall retain the right to a hearing and proceeding on the Accusation under all  
12 the provisions of the APA and shall not be bound by any admission or waiver made herein.

13           3. The Order or any subsequent Order of the Real Estate Commissioner made  
14 pursuant to this Stipulation shall not constitute an estoppel, merger or bar to any further  
15 administrative or civil proceedings by the Bureau of Real Estate with respect to any matters  
16 which were not specifically alleged to be causes for accusation in this proceeding.

17           4. Respondents CDC, CONN, and LEVONIAN understand that by agreeing to  
18 this Stipulation and Agreement, Respondents CDC, CONN and LEVONIAN agree to pay,  
19 pursuant to Section 10106 of the California Business and Professions Code ("Code"), the  
20 Bureau of Real Estate's reasonable costs of investigation and enforcement in this case. The  
21 amount of said costs is \$8,058.88; therefore, Respondents CDC, CONN and LEVONIAN agree  
22 to pay, pursuant to Section 10106 of the Code, \$8,058.88.

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1 DETERMINATION OF ISSUES

2 By reason of the foregoing stipulations, admissions and waivers and solely for  
3 the purpose of settlement of the pending Accusation without a hearing, it is stipulated and  
4 agreed that the following determination of issues shall be made:

5 Respondents CHARLES DUNN COMPANY INC, PATRICK JOSEPH CONN,  
6 and DARRELL RENDEL LEVONIAN are subject to payment of the Bureau of Real Estate's  
7 reasonable costs of investigation and enforcement in this case, pursuant to Code Section 10106.

8 ORDER

9 WHEREFORE, THE FOLLOWING ORDERS are hereby made:

10 (1) The Accusation herein filed on August 24, 2017 against CHARLES DUNN  
11 COMPANY INC, is DISMISSED.

12 (2) The Accusation herein filed on August 24, 2017 against PATRICK JOSEPH  
13 CONN, is DISMISSED.

14 (3) The Accusation herein filed on August 24, 2017 against DARRELL RENDEL  
15 LEVONIAN, is DISMISSED.

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(4) Pursuant to Code Section 10106, Respondents CHARLES DUNN

COMPANY INC, PATRICK JOSEPH CONN, and DARRELL RENDEL LEVONIAN shall pay the sum of \$8,058.88 for the Commissioner's reasonable cost of the investigation and enforcement which led to CalBRE Case No. H-40763 LA. Said payment shall be in the form of a cashier's check or certified check made payable to the "Bureau of Real Estate." The investigation and enforcement costs must be delivered to the Bureau of Real Estate, Flag Section at P.O. Box 137013, Sacramento, CA 95813-7013 within thirty (30) days of the effective date of this Decision and Order. If Respondents fail to timely satisfy this condition as provided for herein, Respondents' real estate licenses shall automatically be suspended until payment is made in full, or until a decision providing otherwise is adopted.

DATED: 4-20-18

  
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Julie L. To, Counsel for Complainant

\* \* \*

We have read the Stipulation and Agreement, have discussed it with our counsel, and its terms are understood by us and are agreeable and acceptable to us.

Respondents CDC, CONN and LEVONIAN shall send a hard copy of the original signed Stipulation and Agreement to: Julie To, Bureau of Real Estate, 320 West Fourth Street, Suite 350, Los Angeles, CA 90013. In the event of time constraints before an administrative hearing, Respondents CDC, CONN and LEVONIAN can signify acceptance and approval of the terms and conditions of this Stipulation and Agreement by emailing a scanned copy of the signature page, as actually signed by Respondents, to the Bureau counsel assigned to this case. Respondents CDC, CONN and LEVONIAN agree, acknowledge and understand that by electronically sending the Bureau a scan of Respondents' actual signatures as they appear on

1 the Stipulation and Agreement, that receipt of the scan by the Bureau shall be binding on  
2 Respondents as if the Bureau had received the original signed Stipulation and Agreement.

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4 DATED: \_\_\_\_\_

5 \_\_\_\_\_  
6 CHARLES DUNN COMPANY INC, Respondent  
7 By: Patrick Joseph Conn, Designated Officer

8 DATED: \_\_\_\_\_


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10 PATRICK JOSEPH CONN, Respondent

11 DATED: 4-11-18

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13 \_\_\_\_\_  
14 DARRELL RENDEL LEVONIAN, Respondent

15 *I have reviewed the Stipulation and Agreement as to form and content and have*  
16 *advised my clients accordingly.*

17 DATED: 4-16-18

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19 \_\_\_\_\_  
20 Frank M. Buda, Attorney for Respondents  
21 CHARLES DUNN COMPANY INC, PATRICK  
22 JOSEPH CONN, and DARRELL RENDEL  
23 LEVONIAN

24 \* \* \*

25 IT IS SO ORDERED \_\_\_\_\_

26 WAYNE S. BELL  
27 REAL ESTATE COMMISSIONER

By: \_\_\_\_\_  
DANIEL J. SANDRI  
Chief Deputy Commissioner

1 the Stipulation and Agreement, that receipt of the scan by the Bureau shall be binding on  
2 Respondents as if the Bureau had received the original signed Stipulation and Agreement.

3  
4 DATED: 4-11-18



5 CHARLES DUNN COMPANY INC, Respondent  
6 By: Patrick Joseph Conn, Designated Officer

7 DATED: 4-11-18



8 PATRICK JOSEPH CONN, Respondent

9  
10 DATED: 4-11-18



11 DARRELL RENDEL LEVONIAN, Respondent

12  
13 *I have reviewed the Stipulation and Agreement as to form and content and have*  
14 *advised my clients accordingly.*

15 DATED: 4-16-18



16 Frank M. Buda, Attorney for Respondents  
17 CHARLES DUNN COMPANY INC, PATRICK  
18 JOSEPH CONN, and DARRELL RENDEL  
19 LEVONIAN

20 \* \* \*

21 IT IS SO ORDERED June 22, 2018.

22 WAYNE S. BELL  
23 REAL ESTATE COMMISSIONER

24 By:   
25 DANIEL J. SANDRI  
26 Chief Deputy Commissioner