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FILED

7/26/18
DEPARTMENT OF REAL ESTATE
By *[Signature]*

8 BEFORE THE DEPARTMENT OF REAL ESTATE
9 STATE OF CALIFORNIA

10 * * *

11 In the Matter of the Accusation Against) No. H- 41119 LA
12 SOUTHLAND LENDING SERVICES)
13 CORPORATION; and JOHN DAVID)
14 RASMUSSEN, individually and as)
15 designated officer of Southland)
16 Lending Services Corporation,)
17 Respondents.)

ACCUSATION

17 The Complainant, Veronica Kilpatrick, a Supervising Special Investigator of the
18 State of California, acting in her official capacity, for cause of Accusation against
19 SOUTHLAND LENDING SERVICES CORPORATION, and JOHN DAVID RASMUSSEN
20 individually and as designated officer of Southland Lending Services Corporation
21 ("Respondents") alleges as follows:

22 1.

23 All references to the "Code" are to the California Business and Professions Code,
24 all references to the "Real Estate Law" are to Part 1 of Division 4 of the Code, and all references
25 to "Regulations" are to Title 10, Chapter 6, California Code of Regulations.

26 2.

27 Respondent SOUTHLAND LENDING SERVICES CORPORATION ("SLSC") is

1 presently licensed or has license rights under the Real Estate Law as a corporate real estate
2 broker. Respondent was originally licensed as a corporate real estate broker by the Department
3 of Real Estate ("DRE") on or about December 19, 1983, with licensed real estate broker
4 Christopher John Bright as its Designated Officer. Effective December 8, 1986, and continuing
5 to the present, Respondent JOHN DAVID RASMUSSEN has been the Designated Officer of
6 Respondent SLSC. Respondent SLSC's corporate real estate broker license is due to expire on
7 May 25, 2020. Since December 2, 2009, SLSC has maintained the licensed fictitious business
8 name "Lighthouse Realty".

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10 3.

11 Respondent JOHN DAVID RASMUSSEN ("RASMUSSEN") is licensed by the
12 DRE as a real estate broker. Respondent RASMUSSEN was originally licensed as a real estate
13 salesperson on August 12, 1981, and as a real estate broker on January 2, 1987. Respondent's
14 real estate broker license is due to expire on February 12, 2019.

15 4.

16 At all times mentioned, in the State of California, Respondents engaged in the
17 business of, acted in the capacity of, advertised, or assumed to act as real estate brokers within
18 the meaning of Code Sections 10131(a) (negotiation of the purchase and sale of real property)
19 and 10131(d) (performing services for borrowers or lenders in connection with loans secured by
20 liens on real property) as the agent of others for or in expectation of compensation.

21 FIRST CAUSE OF ACCUSATION

22 (Unlicensed Activity Against All Respondents)

23 5.

24 During the period January 30, 2016, to August 15, 2016, while Respondent
25 SLSC's corporate real estate broker license was expired, Respondents engaged in acts that
26 require an active real estate license, and collected compensation in the form of real estate
27 commissions, for approximately seven (7) real estate purchase transactions in violation of Code
Section 10130, as shown in the following table:

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3 **Table: Real Estate Sales Transactions**

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Street & City of Property	Date of Activity	Licensed Activity
Ranch Creek Rd., Covina	February 10, 2016	Represented borrower in loan transaction
La Paz Dr., San Diego	February 17, 2016	Represented borrower in loan transaction
Grandview St., San Diego	March 19, 2016	Represented buyer & seller in purchase transaction
Cabrena St., San Diego	April 20, 2016	Represented buyer in purchase transaction
Hawk Rd., Chino Hills	April 29, 2016	Represented borrower in loan transaction
Vacant land, Hesperia	May 4, 2016	Represented borrower in loan transaction
Rosecrans St., San Diego	July 30, 2016	Represented buyer in purchase transaction

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6.

The conduct of Respondents in engaging in real estate sales activity that would require an active real estate license when SLSC was not at the time licensed, constitutes grounds to revoke or suspend Respondents' real estate broker licenses pursuant to Code Sections 10177(d), and/or 10177(g).

SECOND CAUSE OF ACCUSATION

(Failure to Supervise Against RASMUSSEN)

7.

Based on the allegations of paragraphs 4-5, above, Respondent RASMUSSEN failed to exercise reasonable supervision over the activities of his real estate sales brokerage to ensure compliance with the Real Estate Law and the Commissioner's Regulations in violation of Code Sections 10159.2, 10177(h), and Regulation 2725.

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8.

The conduct, acts and omissions of Respondent RASMUSSEN as set forth in paragraph 7, above, are cause for the suspension or revocation of his licenses and license rights pursuant to Code Sections 10177(d), 10177(g), and/or 10177(h).

9.

California Business and Professions Code Section 10106 provides, in pertinent part, that in any order issued in resolution of a disciplinary proceeding before the DRE, the Commissioner may request the administrative law judge to direct a licensee found to have committed a violation of this part to pay a sum not to exceed the reasonable costs of investigation and enforcement of the case.

WHEREFORE, Complainant prays that a hearing be conducted on the allegations of this Accusation and that upon proof thereof, a decision be rendered imposing disciplinary action against all licenses and/or license rights of Respondents SOUTHLAND LENDING SERVICES CORPORATION, and JOHN DAVID RASMUSSEN under the Real Estate Law, for the costs of investigation and enforcement as provided by law, and for such other and further relief as may be proper under other applicable provisions of law.

Dated at San Diego, California, July 13, 2018.


Veronica Kilpatrick
Supervising Special Investigator

cc: Southland Lending Services Corporation
John David Rasmussen
Veronica Kilpatrick
Sacto.