

1 1. All issues which were to be contested and all evidence which was to be
2 presented by Complainant and Respondents at a formal hearing on the Accusation, which
3 hearing was to be held in accordance with the provisions of the Administrative Procedure Act
4 (“APA”), shall instead and in place thereof be submitted solely on the basis of the provisions of
5 this Stipulation and Agreement (“Stipulation”).

6 2. Respondents have received, read, and understand the Statement to
7 Respondent, the Discovery Provisions of the APA, and the Accusation filed by the Department
8 of Real Estate in this proceeding.

9 3. On September 11, 2018, December 27, 2018, and March 5, 2019,
10 respectively, Respondents filed a Notice of Defense pursuant to section 11506 of the
11 Government Code for the purpose of requesting a hearing on the allegations in the Accusation.
12 Respondents hereby freely and voluntarily withdraw said Notices of Defense. Respondents
13 acknowledge that Respondents understand that by withdrawing said Notices of Defense,
14 Respondents will thereby waive Respondents’ right to require the Real Estate Commissioner
15 (“Commissioner”) to prove the allegations in the Accusation at a contested hearing held in
16 accordance with the provisions of the APA and that Respondents will waive other rights
17 afforded to Respondents in connection with the hearing such as the right to present evidence in
18 defense of the allegations in the Accusation and the right to cross-examine witnesses.

19 4. Respondents, pursuant to the limitations set forth below, hereby admit
20 that the factual allegations in the Accusation filed in this proceeding are true and correct and the
21 Commissioner shall not be required to provide further evidence to prove such allegations.

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1 II.

2 The conduct, acts, and/or omissions of Respondent VERZHINE TONoyAN, as
3 described in the Accusation, constitute cause for the suspension or revocation of all real estate
4 licenses, license rights, and license endorsements of Respondent VERZHINE TONoyAN
5 under Code sections 10166.051(b), 10177(d), 10177(g), and 10177(h) for violation of Code
6 sections 10159.2, 10166.051(b), 10177(d), and 10177(g) and Title 10, Chapter 6, California
7 Code of Regulations (“Regulations”) section 2725.

8 III.

9 The conduct, acts, and/or omissions of Respondent ELVIS ABRAMYAN, as
10 described in the Accusation, constitute cause for the suspension or revocation of all real estate
11 licenses and license rights of Respondent ELVIS ABRAMYAN under Code
12 sections 10166.051(b), 10177(d), and 10177(g) for violation of Code sections 10166.051(b),
13 10177(d), and 10177(g).

14 ORDER

15 I.

16 All licenses and licensing rights of Respondent EQUITYMINE under the Real
17 Estate Law, including corporate real estate broker license and company mortgage loan
18 originator license endorsement, are suspended for a period of sixty (60) days from the effective
19 date of this Decision and Order; provided, however, that:

20 1. Sixty (60) days of said suspension shall be stayed for two (2) years upon
21 the following terms and conditions:

22 a. Respondent shall obey all laws, rules, and regulations governing
23 the rights, duties, and responsibilities of a real estate licensee in the
24 State of California.

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1 b. No final determination be made after hearing or upon stipulation
2 that cause for disciplinary action against any of the real estate
3 licenses or license rights of Respondent occurred within two (2) years
4 from the effective date of this Decision and Order. Should such a
5 determination be made, the Commissioner may, in his discretion,
6 vacate and set aside the stay order and reimpose all or a portion of the
7 stayed suspension. Should no such determination be made, the stay
8 imposed herein shall become permanent.

9 2. All licenses and licensing rights of Respondent EQUITYMINE are
10 indefinitely suspended unless or until Respondent EQUITYMINE pays, jointly and severally
11 with Respondent VERZHINE TONAYAN and Respondent ELVIS ABRAMYAN, the sum of
12 \$3,082.63 for the Commissioner's reasonable cost of the investigation and enforcement which
13 led to this disciplinary action. Said payment shall be in the form of a cashier's check made
14 payable to the Department of Real Estate. The investigative and enforcement costs must be
15 delivered to the Department of Real Estate, Flag Section at P.O. Box 137013,
16 Sacramento, CA 95813-7013, prior to the effective date of this Decision and Order.

17 3. Respondent EQUITYMINE shall amend its Nationwide Mortgage
18 Licensing System ("NMLS") filings, including Uniform Mortgage Lender/Mortgage Broker
19 Form ("Company MU1 Form"), to disclose the violations found and discipline imposed,
20 including stayed suspension, by this Decision and Order, within sixty (60) days after the
21 effective date of this Decision and Order. If Respondent EQUITYMINE fails to satisfy this
22 condition in a timely manner as provided for herein, all of Respondent EQUITYMINE'S real
23 estate licenses and license endorsements shall automatically be suspended until its
24 NMLS filings are amended to satisfy this condition, or until a decision providing otherwise is
25 adopted following a hearing held pursuant to this condition.

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1 2. Respondent shall, within nine (9) months from the effective date of this
2 Decision and Order, present evidence satisfactory to the Commissioner that Respondent has,
3 since the most recent issuance of an original or renewal real estate license, taken and
4 successfully completed the continuing education requirements of Article 2.5 of Chapter 3 of the
5 Real Estate Law for renewal of a real estate license. If Respondent fails to satisfy this
6 condition, all of Respondent's real estate licenses and license rights shall automatically be
7 suspended until Respondent presents evidence satisfactory to the Commissioner of having taken
8 and successfully completed the continuing education requirements. Proof of completion of the
9 continuing education courses must be delivered to the Department of Real Estate, Flag Section
10 at P.O. Box 137013, Sacramento, CA 95813-7013.

11 3. All licenses and licensing rights of Respondent VERZHINE TONoyAN
12 are indefinitely suspended unless or until Respondent VERZHINE TONoyAN pays, jointly
13 and severally with Respondent EQUITYMINE and Respondent ELVIS ABRAMYAN, the sum
14 of \$3,082.63 for the Commissioner's reasonable cost of the investigation and enforcement
15 which led to this disciplinary action. Said payment shall be in the form of a cashier's check
16 made payable to the Department of Real Estate. The investigative and enforcement costs must
17 be delivered to the Department of Real Estate, Flag Section at P.O. Box 137013,
18 Sacramento, CA 95813-7013, prior to the effective date of this Decision and Order.

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1 4. Respondent VERZHINE TONAYAN shall amend her NMLS filings,
2 including Uniform Mortgage Biographical Statement & Consent Form (“Individual MU2
3 Form”) and Uniform Individual Mortgage License/Registration & Consent Form (“Individual
4 MU4 Form”), to disclose the violations found and discipline imposed, including stayed
5 suspension, by this Decision and Order, within sixty (60) days after the effective date of this
6 Decision and Order. If Respondent VERZHINE TONAYAN fails to satisfy this condition in a
7 timely manner as provided for herein, all of Respondent VERZHINE TONAYAN’S real estate
8 licenses and license endorsements shall automatically be suspended until her NMLS filings are
9 amended to satisfy this condition, or until a decision providing otherwise is adopted following a
10 hearing held pursuant to this condition.

11 III.

12 All licenses and licensing rights of Respondent ELVIS ABRAMYAN under the
13 Real Estate Law are suspended for a period of sixty (60) days from the effective date of this
14 Decision and Order; provided, however, that:

15 1. Sixty (60) days of said suspension shall be stayed for two (2) years upon
16 the following terms and conditions:

17 a. Respondent shall obey all laws, rules, and regulations governing
18 the rights, duties, and responsibilities of a real estate licensee in the
19 State of California.

20 b. No final determination be made after hearing or upon stipulation
21 that cause for disciplinary action against any of the real estate
22 licenses or license rights of Respondent occurred within two (2) years
23 from the effective date of this Decision and Order. Should such a
24 determination be made, the Commissioner may, in his discretion,
25 vacate and set aside the stay order and reimpose all or a portion of the
26 stayed suspension. Should no such determination be made, the stay
27 imposed herein shall become permanent.

1 2. Respondent shall, within nine (9) months from the effective date of this
2 Decision and Order, present evidence satisfactory to the Commissioner that Respondent has,
3 since the most recent issuance of an original or renewal real estate license, taken and
4 successfully completed the continuing education requirements of Article 2.5 of Chapter 3 of the
5 Real Estate Law for renewal of a real estate license. If Respondent fails to satisfy this
6 condition, all of Respondent's real estate licenses and license rights shall automatically be
7 suspended until Respondent presents evidence satisfactory to the Commissioner of having taken
8 and successfully completed the continuing education requirements. Proof of completion of the
9 continuing education courses must be delivered to the Department of Real Estate, Flag Section
10 at P.O. Box 137013, Sacramento, CA 95813-7013.

11 3. All licenses and licensing rights of Respondent ELVIS ABRAMYAN are
12 indefinitely suspended unless or until Respondent ELVIS ABRAMYAN pays, jointly and
13 severally with Respondent EQUITYMINE and Respondent VERZHINE TONAYAN, the sum
14 of \$3,082.63 for the Commissioner's reasonable cost of the investigation and enforcement
15 which led to this disciplinary action. Said payment shall be in the form of a cashier's check
16 made payable to the Department of Real Estate. The investigative and enforcement costs must
17 be delivered to the Department of Real Estate, Flag Section at P.O. Box 137013,
18 Sacramento, CA 95813-7013, prior to the effective date of this Decision and Order.

19 4. Respondent ELVIS ABRAMYAN shall amend his NMLS filings,
20 including Individual MU4 Form, to disclose the violations found and discipline imposed,
21 including stayed suspension, by this Decision and Order, within sixty (60) days after the
22 effective date of this Decision and Order. If Respondent ELVIS ABRAMYAN fails to satisfy
23 this condition in a timely manner as provided for herein, all of Respondent ELVIS
24 ABRAMYAN'S real estate licenses and license endorsements shall automatically be suspended
25 until his NMLS filings are amended to satisfy this condition, or until a decision providing
26 otherwise is adopted following a hearing held pursuant to this condition.

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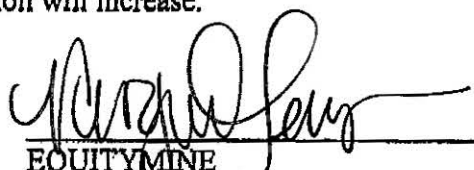
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We have read the Stipulation and Agreement. We understand that we are waiving rights given to us by the California Administrative Procedure Act, (including but not limited to sections 11521 and 11523 of the Government Code), and we willingly, intelligently, and voluntarily waive those rights, including the right to seek reconsideration and the right to seek judicial review of the Commissioner's Decision and Order by way of a writ of mandate.

We agree, acknowledge, and understand that we cannot rescind or amend this Stipulation and Agreement.

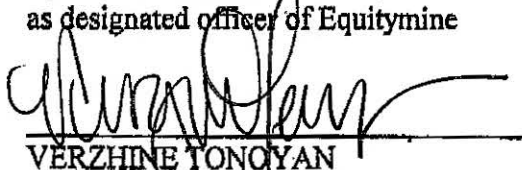
We can signify acceptance and approval of the terms and conditions of this Stipulation and Agreement by mailing the original signed Stipulation and Agreement to: Steve Chu, Department of Real Estate, 320 West 4th Street, Suite 350, Los Angeles, California 90013-1105. Steve Chu must receive the original signed Stipulation and Agreement or a copy faxed to (213) 576-6917 by May 13, 2019; if not, this Stipulation and Agreement is invalid and void because the sum for the Commissioner's reasonable cost of the investigation and enforcement which led to this disciplinary action will increase.

DATED: 7/17/19



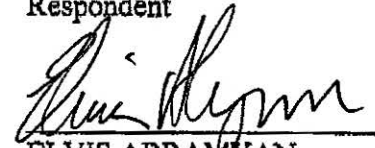
EQUITYMINE
Respondent
By VERZHINE TONOYAN,
as designated officer of Equitymine

DATED: 7/17/19



VERZHINE TONOYAN
Respondent

DATED: 7/17/19



ELVIS ABRAMYAN
Respondent

1 DATED: 7-19-19

Frank Buda

Frank Buda
Counsel for Respondents
Approved as to Form

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The foregoing Stipulation and Agreement is hereby adopted by me as my
Decision in this matter as to Respondent EQUITYMINE, Respondent VERZHINE
TONOYAN, and Respondent ELVIS ABRAMYAN, and shall become effective at
12 o'clock noon on August 29, 2019.

IT IS SO ORDERED August 6, 2019

DANIEL J. SANDRI
ACTING REAL ESTATE COMMISSIONER

Daniel J. Sandri