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FILED

SEP 18 2018

DEPARTMENT OF REAL ESTATE

By John Aguirre

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9 BEFORE THE DEPARTMENT OF REAL ESTATE
10 STATE OF CALIFORNIA

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12 In the Matter of the Accusation against

DRE No. H-41163 LA

13 VACATION PALM SPRINGS REAL ESTATE,
INC. and BRENDAN PATRICK LENIHAN,
14 individually and as designated officer for Vacation
Palm Springs Real Estate, Inc.,

ACCUSATION

15 Respondents.

16
17 The Complainant, Veronica Kilpatrick, a Supervising Special Investigator for the
18 Department of Real Estate ("Department") of the State of California, for cause of Accusation
19 against VACATION PALM SPRINGS REAL ESTATE, INC. and BRENDAN PATRICK
20 LENIHAN, individually and as designated officer for Vacation Palm Springs Real Estate, Inc.,
21 (collectively "Respondents"), alleges as follows:

22 1.

23 The Complainant, Veronica Kilpatrick, acting in her official capacity as a Supervising
24 Special Investigator, makes this Accusation against Respondents.

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2.

2 All references to the "Code" are to the California Business and Professions Code, all
3 references to the "Real Estate Law" are to Part 1 of Division 4 of the Code, and all references to
4 "Regulations" are to the Regulations of the Real Estate Commissioner, Title 10, Chapter 6,
5 California Code of Regulations.

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3.

7 Respondents are presently licensed and/or have license rights under the Real Estate Law
8 (Part 1 of Division 4 of the Code).

9 LICENSE HISTORY

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4.

11 From April 11, 2015, through the present, Respondent VACATION PALM SPRINGS
12 REAL ESTATE, INC. ("VPSREI") has been licensed by the Department as a real estate
13 corporation, License ID 01460731. VPSREI is licensed to do business as Greater Palm Springs
14 Realty, Palm Springs Realty, and Vacation Palm Springs. Unless renewed, Respondent
15 VPSREI's license shall expire on April 10, 2019. Respondent VPSREI has renewal rights
16 pursuant to Code section 10201. The Department retains jurisdiction pursuant to Code section
17 10103.

18
5.

19 From February 23, 2016, through the present, Respondent BRENDAN PATRICK
20 LENIHAN ("LENIHAN") has been licensed by the Department as a real estate broker, License
21 ID 01912185. Respondent LENIHAN was previously licensed as real estate salesperson from
22 September 30, 2013 through February 22, 2016.

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6.

From on or about February 23, 2016, through the present, VPSREI has acted as a corporate real estate broker by and through LENIHAN, as the designated officer and broker responsible, pursuant to Code section 10159.2 for supervising the activities requiring a real estate license conducted on behalf VPSREI by its officers, salespersons, agents, and employees.

7.

At all times material herein, Respondent VPSREI engaged in the business of, acted in the capacity of, advertised or assumed to act as a real estate broker in the State of California, within the meaning of Code section 10131, subdivision (a), including the operation of a residential resale brokerage, and Code section 10131, subdivision (b), including the solicitation or offer to negotiate the sale, purchase or exchange of leases on real property or on a business opportunity to the public, for compensation or the expectation of compensation.

Audit SD 170016

8.

On January 19, 2018, the Department completed an audit examination of the books and records of Respondent's property management services for long-term vacation rental properties which require a real estate license pursuant to Code section 10131, subdivision (b). The audit examination covered a period of time from March 1, 2016 through September 30, 2017. The audit examination revealed violations of the Code and the Regulations as set forth in the following paragraphs, and more fully discussed in Audit Report SD 170016 and the exhibits and work papers attached to said audit report.

9.

An entrance interview was held on November 7, 2017 with Respondent LENIHAN. According to Respondents and the audit work papers examined, Respondent VPSREI provided

1 property management services for long-term (more than 30 days) and short-term (under 30 days)
2 vacation rental properties.

3 10.

4 According to Respondents, VPSREI maintained the following two bank accounts for
5 handling trust funds related to VPSREI's property management activities during the audit period:

6 Trust Account #1 (T/A 1)

7 Bank: Wells Fargo Bank

8 Account Name: Vacation Palm Springs Real Estate Inc.
9 Trust Account for Monthly and Seasonal Rentals

10 Account #: xxxxx0733

11 Signer(s): C. Kinkaid¹, J. Leuenberger, T. Conforti, F. Sassano, S. Holmes, N. Rossi,
12 M. Allen, D. Meyer, and LENIHAN.

13 # of signatures required: One (1)

14 Description: T/A 1 was used for multiple beneficiaries, for handling the receipts and
15 disbursements of trust funds in connection with VPSREI's property management services
16 for long-term vacation rental properties.

17 Bank Account #2 (B/A 2)

18 Bank: Wells Fargo Bank

19 Account Name: Vacation Palm Springs Real Estate Inc. Short Term Vacation Rentals

20 Account #: xxxxx7460

21 Signer(s): C. Kinkaid, J. Leuenberger, T. Conforti, F. Sassano, S. Holmes, N. Rossi,
22 M. Allen, D. Meyer, and LENIHAN.

23 # of signatures required: One (1)

24 ¹ Initials are used in place of individuals' full names to protect their privacy. Documents containing individuals' full names will be provided during the discovery phase of this case to Respondents and/or their attorneys, after service of a timely and proper request for discovery on Complainant's counsel.

1 Description: B/A2 was used for multiple beneficiaries, for handling the receipts and
2 disbursements of trust funds in connection with VPSREI's property management services
3 for short-term and long-term vacation rental properties.

4 General Bank Account #3 (B/A 3)

5 Account #: xxxxx7452

6 Description: B/A 3 was used as VPSREI's general bank account, to hold VPSREI's
7 funds for general business activities.

8 Violations

9 11.

10 In the course of its property management activities during the audit examination period
11 described above in Paragraph 8, Respondent VPSREI acted in violation of the Code and the
12 Regulations as follows:

13 11(A). Issue One(a). Code section 10145(a) and Regulation 2832.1. Trust fund
14 handling for multiple beneficiaries

15 The Department's auditor prepared a bank reconciliation for T/A 1 in connection with
16 VPSREI's property management services for long-term vacation rental properties with the cut-
17 off date of April 30, 2017. The minimum accountability was determined based on the separate
18 records and the trial balance report provided by A. Hoffman (VPSREI's Senior Accountant/CPA,
19 a non-licensee). The adjusted bank balance was compared to the minimum accountability. As of
20 April 30, 2017, VPSREI caused, suffered, or permitted the balance of funds in T/A 1 to be
21 reduced to an amount of approximately \$84, 953.77, less than the aggregate liability of VPSREI
22 to all owners of such funds.

23 The shortage was due to minimum negative property balance of property accounts,
24 minimum bank charges and credit card fees, commingled fees/commissions, and

1 unidentified/unaccounted for funds due to inadequate record keeping. Examples of negative
2 property balances of property accounts include, without limitation: California Life
3 (<\$1,618.18>), Luxury Palm Springs Casa Ranchero Condo II (<\$930.56>), Movie Colony
4 Spanish Estate (<\$1,075.27>), and Serenity South Palm Springs Villa (<\$605.86>).

5 Respondents failed to provide any evidence that the owners of the trust funds had given
6 their written consent to allow Respondent VPSREI to reduce the balance of the funds in T/A 1 to
7 an amount less than the existing aggregate trust fund liabilities, in violation of Code section
8 10145 and Regulation 2832.1.

9 11(B). Issue One(b). Code section 10145(a) and Regulation 2832.1. Trust fund
10 handling for multiple beneficiaries

11 The Department's auditor prepared a bank reconciliation for T/A 1 in connection with
12 VPSREI's property management services for long-term vacation rental properties with the cut-
13 off date of September 30, 2017. The minimum accountability was determined based on the
14 separate records and the trial balance report provided by A. Hoffman. The adjusted bank balance
15 was compared to the minimum accountability. As of September 30, 2017, VPSREI caused,
16 suffered, or permitted the balance of funds in T/A 1 to be reduced to an amount of approximately
17 \$181,592.03, less than the aggregate liability of VPSREI to all owners of such funds.

18 The shortage was due to minimum negative property balance of property accounts,
19 minimum bank charges and credit card fees, minimum unauthorized disbursements/commingling
20 into B/A 3, minimum receipts through credit card payments and checks deposited into B/A 2 by
21 error between May of 2017 through September of 2017, and unidentified/unaccounted for funds
22 due to inadequate record keeping. Examples of negative property balances of property accounts
23 include, without limitation: Mesa Modern Ranch (<\$8,393.49>), Mesquite Vacation Getaway
24 Condo (<\$1,228.65>), Mountainside Modern (<\$3,953.86>), and Rancho Mirage Private Luxury

1 (<\$2,605.50>).

2 Respondents failed to provide any evidence that the owners of the trust funds had given
3 their written consent to allow Respondent VPSREI to reduce the balance of the funds in T/A 1 to
4 an amount less than the existing aggregate trust fund liabilities, in violation of Code section
5 10145 and Regulation 2832.1.

6 On or about October 27, 2017 and January 2, 2018, Respondent LENIHAN made two (2)
7 deposits into T/A 1 to cure the total trust fund shortage which were transferred from B/A 3.

8 11(C). Issue One (c). B/A 2 – As of September 30, 2017

9 Based on the records provided for the audit examination, trust funds collected for
10 VPSREI's long-term vacation rentals were also deposited into B/A 2 during the audit period.
11 The bank account for multiple beneficiaries was maintained for handling the receipts and
12 disbursements of trust funds in connection with VPSREI's property management services for
13 short-term and long-term vacation rental properties. A bank reconciliation for B/A 2 was not
14 performed.

15 11(D). Issue Three². Code section 10145 and Regulation 2831. Trust fund records to be
16 maintained

17 During the audit period, Respondent VPSREI failed to maintain accurate or complete
18 records of trust funds received and disbursed (control records) for T/A 1, in violation of Code
19 section 10145 and Regulation 2381. The inaccuracies and omissions are discussed below.

20 Some receipts were recorded on the control record of T/A 1 but were not deposited into
21 T/A 1 and instead deposited into B/A 2. Examples of the receipts include, without limitation, the
22 following:

23 ///

24 ² Issue Two skipped intentionally.

<u>Date</u>	<u>Amount</u>	<u>Property Name</u>
08/30/2016	\$11,308.96	Bighorn Private Luxury
12/05/2016	\$16,952.69	Bighorn Private Luxury
08/30/2016	\$8,394.42	Midcentury Desert Cool
12/30/2016	\$31,324.59	Midcentury Desert Cool

Some disbursements were recorded on the control record for T/A 1 but the funds were not disbursed from T/A 1, the funds were instead disbursed from B/A 2. Examples of the disbursements include, without limitation, the following:

<u>Date</u>	<u>Amount</u>	<u>Property Name</u>
12/31/2016	\$4,772.08	Bighorn Private Luxury
03/31/2017	\$6,052.50	Kiss of the Mermaid
02/28/2017	\$10,062.57	Midcentury Desert Cool
03/31/2017	\$11,553.32	Midcentury Desert Cool

In addition, some receipts were recorded on the control record of T/A 1 but were not deposited into T/A 1 and/or B/A 2. Examples of the receipts include, without limitation, the following:

<u>Date</u>	<u>Amount</u>	<u>Property Name</u>
01/17/2017	\$513.36	Bighorn Private Luxury
08/19/2017	\$500.00	Mountain Ridge Views
08/28/2017	\$215.00	California Vacation Villa
07/07/2017	\$500.00	Vista Views Condo

Moreover, some disbursements were recorded on the control record of T/A 1 but were not disbursed from T/A 1 and/or B/A 2. Examples of the disbursements include, without limitation, the following:

<u>Date</u>	<u>Amount</u>	<u>Property Name</u>
04/04/2017	\$215.00	Bighorn Private Luxury
08/03/2016	\$2,204.01	Midcentury Desert Cool
08/27/2016	\$140.86	Mesquite Condo in the Sun
04/01/2017	\$250.00	Palm Villas Paradise View

11(E). Issue Four. Code section 10145 and Regulation 2831.1. Separate records for each beneficiary or transaction

(i). Respondent VPSREI failed to maintain accurate or complete separate records for T/A 1 of all trust funds received and disbursed related to Respondent's property management activities for long-term vacation rentals, in violation of Code section 10145(g) and Regulation 2831.1. Some receipts were recorded on the separate records for T/A 1 but were not deposited into T/A 1. Said receipts were deposited into B/A 2 instead. Some disbursements were recorded on the separate records for T/A 1 but were not disbursed from T/A 1. Said disbursements were disbursed from B/A 2 instead. Some receipts were recorded on the separate records of T/A 1 but were not deposited into T/A 1 and/or B/A 2. In addition, some disbursements were recorded on the separate records of T/A 1 but were not disbursed from T/A 1 and/or B/A 2. Examples of the receipts and disbursements are the same as in Issue Three, Paragraph 11(D), above.

(ii) Respondent VPSREI failed to maintain a separate record for the minimum "unidentified/unaccounted for funds" held in T/A 1 totaling \$47,131.33 as of April 30, 2017 and totaling \$57,940.94 as of September 30, 2017, in violation of Code section 10145 and Regulation 2831.1.

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1 11(F). Issue Five. Code section 10145 and Regulation 2831.2. Trust account
2 reconciliation

3 (a) During the audit period, Respondent VPSREI failed to maintain a monthly and
4 timely reconciliation for T/A 1 (comparing the balance of all separate beneficiary or
5 transaction records (separate records) to the balance of all trust funds received and
6 disbursed (control record)) in connection with VPSREI's property management
7 services for long-term vacation rentals, in violation of Code section 10145 and
8 Regulation 2831.2.

9 (b) During the audit period, VPSREI failed to reconcile the minimum
10 "unidentified/unaccounted for funds" held in T/A 1 totaling \$47,131.33 as of
11 April 30, 2017 and totaling \$57,940.94 as of September 30, 2017.

12 11(G). Issue Six. Code section 10145 and Regulation 2832. Trust fund handling/Trust
13 account designation

14 Based on the audit work papers and bank signature cards examined, Respondent VPSREI
15 collected minimum receipts totaling \$127,022.06 in connection with property management
16 services for long-term vacation rentals through credit card payments and checks which were
17 deposited into B/A 2, between May of 2017 through September of 2017. B/A 2 was used for
18 handling the receipts and disbursements of trust funds in connection with VPSREI's property
19 management services for long-term vacation rentals although the account was not designated as a
20 trust account, in violation of Code section 10145 and Regulation 2832.

21 11(H). Issue Seven. Code section 10145 and Regulation 2834. Trust account
22 withdrawals

23 According to the bank signature cards maintained for T/A 1 and B/A 2, Respondent
24 LENIHAN was not a signer on T/A 1 and B/A 2 during the audit period from March 1, 2016

1 through December 18, 2016. LENIHAN was added as a signer to T/A 1 and B/A 2 on December
2 19, 2016. Moreover, Respondents allowed unlicensed employees and shareholders of VPSREI's
3 parent company, Wyndham Worldwide Corporation (WWC), to be signers on said accounts
4 without fidelity bond coverage. Said acts are in violation of Code section 10145 and Regulation
5 2834. The employees/shareholders include: J. Ellenberger, T. Conforti, F. Sassano, S. Holmes,
6 N. Rossi, and M. Allen.

7 11(I). Issue Eight. Code sections 10145, 10176(i), 10177(j), 10176(e), and Regulation
8 2832. Unauthorized disbursements/Fraud/Dishonest Dealing/Commingling/Trust funds in
9 general business account/Mishandling of trust funds

10 There were minimum unauthorized disbursements of trust funds from T/A 1 totaling
11 <\$28,976.01> as of September 30, 2017. Said funds over-disbursed from T/A 1 and caused part
12 of the minimum shortage in T/A 1 as of September 30, 2017. Instead of transferring
13 \$600,382.38, VPSREI transferred a total of \$629,358.39 into B/A 3 on September 14, 2017. By
14 transferring said funds from T/A 1 to B/A 3, said funds were commingled with VPSREI's
15 general funds which were held in B/A 3, in violation of Code sections 10145, 10176(i) or
16 10177(j), 10176(e), and Regulation 2832.

17 11(J). Issue Nine. Code sections 10145, 10176(e), and Regulation 2835(b).
18 Commingling/Broker's funds held long than twenty-five (25) days

19 As of April 30, 2017, VPSREI kept a minimum of \$637,585.94 of commingled
20 fees/commissions for over twenty-five (25) days in T/A 1, in violation of Code sections 10145,
21 10176(e), and Regulation 2835(b). Examples of the fees/commissions include, without
22 limitation, the following:

23 ///

24 ///

<u>Date</u>	<u>Amount</u>	<u>Property Name</u>
12/31/2016	\$1,590.69	Bighorn Private Luxury
02/28/2017	\$3,354.19	Midcentury Desert Cool
03/31/2017	\$2,017.50	Kiss of the Mermaid

11(K). Issue Ten. Code sections 10176(g) and Regulation 2830. Secret profit or undisclosed compensation/Broker placement of trust funds with financial institutions

Based on the records provided for the audit examination, some trust funds that were collected for the long-term vacation rental properties were also deposited into B/A 2. VPSREI had an earnings credit relationship with Wells Fargo Bank whereby VPSREI received earnings credit from trust funds available in B/A 2 in connection with the property management services for the long-term and short-term vacation rental properties during the audit period. The earnings credits were used to offset bank service charges incurred on the B/A 2 and this was not disclosed in writing to the owners of the trust funds, in violation of Code sections 10176(g) and Regulation 2830. Examples of the earnings credits include, without limitation, the following:

<u>Month/Year</u>	<u>Amount</u>	<u>Month/Year</u>	<u>Amount</u>
March 2016	\$1,054.14	April 2016	\$818.65
May 2016	\$487.17	June 2016	\$315.74
January 2017	\$489.42	February 2017	\$424.35
July 2017	\$498.61	August 2017	\$520.96

11(L). Issue Eleven. Code sections 10159.2, 10177(h), and Regulation 2725.

Responsibility of corporate officer in charge/Broker supervision

Respondent LENIHAN did not exercise adequate supervision and control over VPSREI's property management activities for long-term vacation rental properties, conducted by VPSREI's

1 officers, salespersons, licensees, and employees, to ensure compliance with the Real Estate Laws
2 and Regulations.

3 LENIHAN failed to maintain complete and accurate control records and separate records
4 for T/A 1, failed to maintain trust account reconciliations for T/A 1 in connection with property
5 management services for long-term vacation rental properties during the audit period.

6 Minimum receipts in connection with the property management services for the long-
7 term vacation rental activities in the form of credit card payments and checks totaling
8 \$127,022.06 were deposited into B/A 2 between May of 2017 through September of 2017. B/A
9 2 was used for handling the receipts and disbursements of trust funds in connection with property
10 management services, was not set-up as a trust account.

11 LENIHAN allowed multiple unlicensed employees to be signers on T/A 1 and B/A 2
12 without fidelity bond coverage. In addition, LENIHAN was not a signer on T/A 1 and B/A 2
13 during the period of March 1, 2016 through December 18, 2016.

14 The acts stated above and in Paragraphs 11(A) through 11(K), are in violation of Code
15 section 10159.2, 10177(h), and Regulation 2725.

16 12.

17 The conduct of Respondent VPSREI as described above in Paragraphs 11(A) through
18 11(K), violated the Code and the Regulations as set forth below:

19 PARAGRAPH

PROVISIONS VIOLATED

20 11(A)

Code section 10145 and Regulations 2832.1

21 11(B)

Code section 10145 and Regulations 2832.1

22 11(D)

Code section 10145 and Regulation 2831

23 11(E)

Code section 10145 and Regulation 2831.1

24 11(F)

Code section 10145 and Regulation 2831.2

1	11(G)	Code section 10145(a) and Regulation 2832
2	11(H)	Code sections 10145 and Regulation 2834
3	11(I)	Code sections 10145, 10176(i) or 10177(j), 10176(e), and
4		Regulation 2832
5	11(J)	Code sections 10145, 10176(e), and Regulation 2835(b)
6	11(K)	Code section 10176(g) and Regulation 2830

7 13.

8 The foregoing violations constitute cause for the suspension or revocation of the real
9 estate licenses and license rights of Respondent VPSREI under the provisions of Code sections
10 10177(d), 10176(e), 10176(i) or 10177(j), and/or 10177(g).

11 Respondent LENIHAN- Broker Supervision

12 14.

13 The conduct, acts and/or omissions of Respondent LENIHAN as described above in
14 Paragraph 11(L), constitutes a failure to exercise the supervision and control over the activities
15 of VPSREI to ensure compliance with the Real Estate Law and Regulations, in violation of Code
16 section 10159.2 and Regulation 2725. Said conduct, acts, or omissions constitute cause to
17 suspend or revoke the real estate license and license rights of Respondent LENIHAN pursuant to
18 Code sections 10177(h), 10177(d), and/or 10177(g).

19 Disclosure of Licensed Status in Advertising

20 15.

21 Code section 10140.6 provides:

22 “(a) A real estate licensee shall not publish, circulate, distribute, or cause
23 to be published, circulated, or distributed in any newspaper or periodical, or by
24 mail, any matter pertaining to any activity for which a real estate license is
required that does not contain a designation disclosing that he or she is
performing acts for which a real estate license is required.

Regulation 2773 provides:

“(a) A real estate broker or salesperson, when engaging in acts for which a license is required, shall disclose its, his or her eight (8) digit real estate license identification number on all solicitation materials intended to be the first point of contact with consumers. If the name of more than one licensee appears in the solicitation, the license identification number of each licensee shall be disclosed. The license numbers of employing brokers or corporate brokers whose names or logos or trademarks appear on solicitation materials along with the names and license numbers of licensed employees or broker associates do not need to appear on those materials.

Solicitation materials intended to be the first point of contact with consumers, and in which a licensee must disclose a license identification number, include the following:

- (1) Business cards;
- (2) Stationery;
- (3) Websites owned, controlled, and/or maintained by the soliciting real estate licensee; and
- (4) Promotional and advertising fliers, brochures, email and regular mail, leaflets, and any marketing or promotional materials designed to solicit the creation of a professional relationship between the licensee and a consumer, or which is intended to incentivize, induce or entice a consumer to contact the licensee about any service for which a license is required. The type size of the license identification number shall be no smaller than the smallest size type used in the solicitation material.

(b) For the purposes of Business and Professions Code Section 10140.6, solicitation materials do not include the following:

- (1) Advertisements in electronic media (including, without limitation, radio, cinema and television ads, and the opening section of streaming video and audio);
- (2) Print advertising in any newspaper or periodical; and
- (3) “For Sale” signs placed on or around a property intended to alert the public the property is available for lease, purchase or trade.

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17.

On August 30, 2018, a Special Investigator for the Department conducted an internet search of <http://vacationpalmsprings.com/> - a website owned, controlled, or maintained by Respondent VPSREI for the solicitation of short-term and long-term vacation rental properties. The website does not list VPSREI's real estate license identification number in violation of Code section 10140.6 and Regulation 2773, which constitutes cause to suspend or revoke the real estate licenses and license rights of Respondent VPSREI pursuant to Code sections 10177(d) and/or 10177(g) and Respondent LENIHAN, pursuant to Code sections 10177(h), 10177(d), and/or 10177(g).

Audit Costs

18.

Code section 10148(b) provides, in pertinent part, that the Commissioner shall charge a real estate broker for the cost of any audit, if the Commissioner has found in a final decision following a disciplinary hearing that the broker has violated Code section 10145 or a regulation or rule of the Commissioner interpreting said section.

Investigation and Enforcement Costs

19.

Code section 10106 provides, in pertinent part, that in any order issued in resolution of a disciplinary proceeding before the Department of Real Estate, 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 the 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 under the Real Estate Law (Part 1 of

1 Division 4 of the Business and Professions Code), for the costs of the audit, investigation, and
2 enforcement as permitted by law, and for such other and further relief as may be proper under
3 other provisions of law.

4 Dated at San Diego, California this 8 day of September 2018.

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6 
7 VERONICA KILPATRICK
8 Supervising Special Investigator
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11 cc: Vacation Palm Springs Real Estate, Inc.
12 Brendan Patrick Lenihan
13 Veronica Kilpatrick
14 Sacto
15 Audits/Zaky Wanis
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