

FILED

FEB 25 2019

DEPT. OF REAL ESTATE
By *Cal Stone*

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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 of) No. H# 41305 LA
13 WS REALTY INC, doing business as) ACCUSATION
14 Optimum Property Management,)
15 RONALD MEDERIOS, individually and)
16 as designated officer of WS Realty Inc,)
17 KATHERINE HALL, and)
18 KAREN MARIE DOMINGUE,)
Respondents.)

19 The Complainant, Veronica Kilpatrick, a Supervising Special Investigator of the
20 State of California, for cause of Accusation against WS REALTY INC, doing business as
21 Optimum Property Management, RONALD MEDERIOS, individually and as designated
22 officer of WS Realty Inc, KATHERINE HALL, and KAREN MARIE DOMINGUE,
23 (“Respondents”), is informed and alleges as follows:

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Accusation of WS Realty Inc, Ronald Mederios, Katherine Hall, and Karen Marie Domingue

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2 The Complainant, Veronica Kilpatrick, acting in her official capacity as a
3 Supervising Special Investigator of the State of California, makes this Accusation against
4 Respondents WS REALTY INC, RONALD MEDERIOS, KATHERINE HALL, and KAREN
5 MARIE DOMINGUE.

2. 6

7 All references to the "Code" are to the California Business and Professions Code
8 and all references to "Regulations" are to Title 10, Chapter 6, California Code of Regulations.

9 LICENSE HISTORY, RELATIONSHIPS, AND AFFILIATIONS

3. 10

11 3(a) Respondent WS REALTY INC ("WS REALTY") presently has license
12 rights under the Real Estate Law, Part 1 of Division 4 of the Code as a corporate real estate
13 broker.

14 3(b) Respondent RONALD MEDERIOS ("MEDERIOS") presently has
15 license rights as a real estate broker.

16 3(c) At all times mentioned, Respondent WS REALTY was licensed by the
17 Department of Real Estate ("Department") as a corporate real estate broker by and through
18 Respondent MEDERIOS, as the designated officer and broker responsible, pursuant to Code
19 section 10159.2, for supervising the activities requiring a real estate license conducted on behalf
20 of WS REALTY, or by WS REALTY'S officers, agents and employees.

21 3(d) Respondent KATHERINE HALL ("HALL") presently has license rights
22 as a real estate broker.

23 3(e) From January 1, 2018, to October 27, 2018, Respondent HALL had no
24 broker-associate affiliation. From October 28, 2018, through the present, HALL was affiliated
25 as a broker-associate with employing broker Respondent WS REALTY.

26 3(f) Respondent HALL is the owner of and has the authority to act on behalf
27 of Respondent WS REALTY.

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1 6(f) Respondents WS REALTY and HALL commingled trust funds in the
2 amount of \$100,900.00 and converted trust funds, and \$15,768.20 of the converted trust funds
3 was disbursed to HALL, in violation of Code sections 10145, 10176(e), 10176(i), and 10177(j)
4 and Regulations section 2835.

5 6(g) Respondent WS REALTY did not notify the Department on
6 January 1, 2018, of the employment of Respondent HALL as a broker associate, in violation of
7 Code section 10161.8.

8 6(h) Respondent WS REALTY employed Respondent HALL and Brook
9 Orion Brownell but did not enter into a written employment relationship agreement with HALL
10 or Brownell, in violation of Regulations section 2726.

11 6(i) The address maintained by Respondent WS REALTY with the
12 Department was 19123 Outer Hwy 18, Apple Valley, CA 92307, but WS REALTY moved to
13 16911 Main St, Hesperia, CA 92345 in January 2017. WS REALTY did not inform the Real
14 Estate Commissioner of the new address until June 18, 2018, in violation of Code
15 section 10162 and Regulations section 2715.

16 6(j) Respondents WS REALTY and HALL did not disclose their real estate
17 identification numbers on solicitation materials intended to be the first point of contact with
18 consumers, including, but not limited to, internet websites, in violation of Code
19 section 10140.6.

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The conduct, acts, or omissions of Respondents WS REALTY, HALL, and DOMINGUE, described in Paragraph 6 above, violated the Code and the Regulations as set forth below:

<u>PARAGRAPH</u>	<u>PROVISIONS VIOLATED</u>
6(a)	Code section 10145 and Regulations section 2832.1 (WS REALTY)
6(b)	Code sections 10130 and 10137 (WS REALTY and DOMINGUE)
6(c)	Code section 10145 and Regulations section 2832 (WS REALTY)
6(d)	Code section 10145 and Regulations section 2831.2 (WS REALTY)
6(e)	Code section 10145 and Regulations section 2834 (WS REALTY and HALL)
6(f)	Code Code sections 10145, 10176(e), 10176(i), and 10177(j) and Regulations section 2835 (WS REALTY and HALL)
6(g)	Code section 10161.8 (WS REALTY)
6(h)	Regulations section 2726 (WS REALTY)
6(i)	Code section 10162 and Regulations section 2715 (WS REALTY)
6(j)	Code section 10140.6 (WS REALTY and HALL)

The foregoing violations constitute cause for the suspension or revocation of all the licenses, license endorsements, and license rights of Respondent WS REALTY under the Real Estate Law pursuant to the provisions of Code sections 10165, 10176(e), 10176(i), 10177(d), 10177(g), and/or 10177(j).

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1 WHEREFORE, Complainant prays that a hearing be conducted on the
2 allegations of this Accusation and that upon proof thereof, a decision be rendered imposing
3 disciplinary action against all the licenses, license endorsements, and license rights of
4 Respondents WS REALTY INC, RONALD MEDERIOS, KATHERINE HALL, and KAREN
5 MARIE DOMINGUE under the Real Estate Law, for the cost of audit, investigation, and
6 enforcement as permitted by law, and for such other and further relief as may be proper under
7 other applicable provisions of law.

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9 Dated at San Diego, California

10 this 2 day of 12, 2019

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12 
13 Veronica Kilpatrick
14 Supervising Special Investigator

15 cc: WS REALTY INC
16 RONALD MEDERIOS
17 KATHERINE HALL
18 KAREN MARIE DOMINGUE
19 Veronica Kilpatrick
20 Sacto.
21 Audits