

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

4 3. On March 11, 2019, Respondents filed a Notice of Defense pursuant to
5 Section 11506 of the Government Code for the purpose of requesting a hearing on the
6 allegations in the Accusation. Respondents hereby freely and voluntarily withdraw said Notice
7 of Defense. Respondents acknowledge that Respondents understand that by withdrawing said
8 Notice of Defense, Respondents will thereby waive Respondents' right to require the Real
9 Estate Commissioner ("Commissioner") to prove the allegations in the Accusation at a
10 contested hearing held in accordance with the provisions of the APA and that Respondents will
11 waive other rights afforded to Respondents in connection with the hearing such as the right to
12 present evidence in defense of the allegations in the Accusation and the right to cross-examine
13 witnesses.

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

17 5. It is understood by the parties that the Real Estate Commissioner may
18 adopt the Stipulation as his Decision in this matter, thereby imposing the penalty and sanctions
19 on Respondents' real estate license and license rights as set forth in the below Order. In the
20 event that the Commissioner in his discretion does not adopt the Stipulation, it shall be void
21 and of no effect, and Respondents shall retain the right to a hearing and proceeding on the
22 Accusation under all the provisions of the APA and shall not be bound by any admission or
23 waiver made herein.

24 6. The Order or any subsequent Order of the Commissioner made pursuant
25 to this Stipulation shall not constitute an estoppel, merger or bar to any further administrative or
26 civil proceedings by the Department with respect to any matters which were not specifically
27 alleged to be causes for the Accusation in this proceeding.

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 I.

6 The conduct, acts, and/or omissions of Respondent WS REALTY INC, as
7 described in the Accusation, constitute cause for the suspension or revocation of all real estate
8 licenses and license rights of Respondent WS REALTY INC under California Business and
9 Professions Code ("Code") sections 10165, 10176(e), 10177(d), and 10177(g) for violation of
10 Code sections 10137, 10140.6, 10145, 10161.8, and 10162 and Title 10, Chapter 6, California
11 Code of Regulations ("Regulations") sections 2715, 2726, 2831.2, 2832, 2832.1, 2834,
12 and 2835.

13 II.

14 The conduct, acts, and/or omissions of Respondent RONALD MEDERIOS, as
15 described in the Accusation, constitute cause for the suspension or revocation of all real estate
16 licenses and license rights of Respondent RONALD MEDERIOS under Code
17 sections 10177(d), 10177(g), and/or 10177(h) for violation of Code section 10159.2 and
18 Regulations section 2725.

19 III.

20 The conduct, acts, and/or omissions of Respondent KATHERINE HALL, as
21 described in the Accusation, constitute cause for the suspension or revocation of all real estate
22 licenses and license rights of Respondent KATHERINE HALL under Code sections 10176(e),
23 10177(d), and/or 10177(g) for violation of Code sections 10140.6, 10145, 10176(e), and
24 Regulations sections 2834 and 2835.

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1 4. All licenses and licensing rights of Respondent WS REALTY INC are
2 indefinitely suspended unless or until Respondent WS REALTY INC pays, jointly and
3 severally with Respondents RONALD MEDERIOS and KATHERINE HALL, the sum of
4 \$18,277.86 for the Commissioner's cost of the audit which led to this disciplinary action
5 pursuant to Code section 10148. Respondent WS REALTY INC shall pay such cost within
6 sixty (60) days of receiving an invoice therefore from the Commissioner. Said payment shall
7 be in the form of a cashier's check made payable to the Department of Real Estate. The audit
8 cost must be delivered to the Department of Real Estate, Flag Section at P.O. Box 137013,
9 Sacramento, CA 95813-7013.

10 5. All licenses and licensing rights of Respondent WS REALTY INC are
11 indefinitely suspended unless or until Respondent WS REALTY INC pays, jointly and
12 severally with Respondents RONALD MEDERIOS and KATHERINE HALL, the sum of
13 \$5,999.30 for the Commissioner's reasonable cost of the investigation and enforcement which
14 led to this disciplinary action. Said payment shall be in the form of a cashier's check made
15 payable to the Department of Real Estate. The investigative and enforcement costs must be
16 delivered to the Department of Real Estate, Flag Section at P.O. Box 137013,
17 Sacramento, CA 95813-7013, prior to the effective date of this Decision and Order.

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1 2. The restricted license issued to Respondent may be suspended prior to
2 hearing by Order of the Real Estate Commissioner on evidence satisfactory to the
3 Commissioner that Respondent has violated provisions of the California Real Estate Law, the
4 Subdivided Lands Law, Regulations of the Real Estate Commissioner, or the conditions
5 attaching to this restricted license.

6 3. Respondent shall not be eligible to apply for the issuance of an
7 unrestricted real estate license, including designated officer or mortgage loan originator
8 endorsement, nor for the removal of any of the conditions, limitations or restrictions of a
9 restricted license until two (2) years have elapsed from the effective date of this Decision and
10 Order. Respondent withdraws all pending license applications.

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

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1 5. All licenses and licensing rights of Respondent are indefinitely
2 suspended unless or until Respondent provides proof satisfactory to the Commissioner of
3 having taken and successfully completed the continuing education course on trust fund
4 accounting and handling specified in Code section 10170.5(a)(3). Proof of satisfaction of this
5 requirement includes evidence that Respondent has successfully completed the trust fund
6 accounting and handling continuing education course within one hundred twenty (120) days
7 prior to the effective date of this Decision and Order. Proof of completion of the trust fund
8 accounting and handling course must be delivered to the Department of Real Estate, Flag
9 Section at P.O. Box 137013, Sacramento, CA 95813-7013, prior to the effective date of this
10 Decision and Order.

11 6. All licenses and licensing rights of Respondent RONALD MEDERIOS
12 are indefinitely suspended unless or until Respondent RONALD MEDERIOS pays, jointly and
13 severally with Respondents WS REALTY INC and KATHERINE HALL, the sum of
14 \$18,277.86 for the Commissioner's cost of the audit which led to this disciplinary action
15 pursuant to Code section 10148. Respondent RONALD MEDERIOS shall pay such cost
16 within sixty (60) days of receiving an invoice therefore from the Commissioner. Said payment
17 shall be in the form of a cashier's check made payable to the Department of Real Estate. The
18 audit cost must be delivered to the Department of Real Estate, Flag Section at
19 P.O. Box 137013, Sacramento, CA 95813-7013.

20 7. All licenses and licensing rights of Respondent RONALD MEDERIOS
21 are indefinitely suspended unless or until Respondent RONALD MEDERIOS pays, jointly and
22 severally with Respondents WS REALTY INC and KATHERINE HALL, the sum of \$5,999.30
23 for the Commissioner's reasonable cost of the investigation and enforcement which led to this
24 disciplinary action. Said payment shall be in the form of a cashier's check made payable to the
25 Department of Real Estate. The investigative and enforcement costs must be delivered to the
26 Department of Real Estate, Flag Section at P.O. Box 137013, Sacramento, CA 95813-7013,
27 prior to the effective date of this Decision and Order.

1 III.

2 All licenses and licensing rights of Respondent KATHERINE HALL under the
3 Real Estate Law are revoked; provided, however, a restricted real estate broker license shall be
4 issued to Respondent pursuant to Section 10156.5 of the Code if Respondent makes application
5 therefor and pays to the Department the appropriate fee for the restricted license within ninety
6 (90) days from the effective date of this Decision. The restricted license issued to Respondent
7 shall be subject to all of the provisions of Section 10156.7 of the Code and to the following
8 limitations, conditions, and restrictions imposed under Section 10156.6 of the Code:

9 1. The restricted license issued to Respondent may be suspended prior to
10 hearing by Order of the Real Estate Commissioner in the event of Respondent's conviction,
11 plea of guilty, or plea of nolo contendere to a crime which is substantially related to
12 Respondent's fitness or capacity as a real estate licensee.

13 2. The restricted license issued to Respondent may be suspended prior to
14 hearing by Order of the Real Estate Commissioner on evidence satisfactory to the
15 Commissioner that Respondent has violated provisions of the California Real Estate Law, the
16 Subdivided Lands Law, Regulations of the Real Estate Commissioner, or the conditions
17 attaching to this restricted license.

18 3. Respondent shall not be eligible to apply for the issuance of an
19 unrestricted real estate license, including designated officer or mortgage loan originator
20 endorsement, nor for the removal of any of the conditions, limitations or restrictions of a
21 restricted license until two (2) years have elapsed from the effective date of this Decision and
22 Order. Respondent withdraws all pending license applications.

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1 4. 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, Respondent's real estate license shall automatically be suspended until Respondent
7 presents evidence satisfactory to the Commissioner of having taken and successfully completed
8 the continuing education requirements. Proof of completion of the continuing education
9 courses must be delivered to the Department of Real Estate, Flag Section at P.O. Box 137013,
10 Sacramento, CA 95813-7013.

11 5. All licenses and licensing rights of Respondent KATHERINE HALL are
12 indefinitely suspended unless or until Respondent KATHERINE HALL pays, jointly and
13 severally with Respondents WS REALTY INC and RONALD MEDERIOS, the sum of
14 \$18,277.86 for the Commissioner's cost of the audit which led to this disciplinary action
15 pursuant to Code section 10148. Respondent KATHERINE HALL shall pay such cost within
16 sixty (60) days of receiving an invoice therefore from the Commissioner. Said payment shall
17 be in the form of a cashier's check made payable to the Department of Real Estate. The audit
18 cost must be delivered to the Department of Real Estate, Flag Section at P.O. Box 137013,
19 Sacramento, CA 95813-7013.

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1 6. All licenses and licensing rights of Respondent KATHERINE HALL are
2 indefinitely suspended unless or until Respondent KATHERINE HALL pays, jointly and
3 severally with Respondents WS REALTY INC and RONALD MEDERIOS, the sum of
4 \$5,999.30 for the Commissioner's reasonable cost of the investigation and enforcement which
5 led to this disciplinary action. Said payment shall be in the form of a cashier's check made
6 payable to the Department of Real Estate. The investigative and enforcement costs must be
7 delivered to the Department of Real Estate, Flag Section at P.O. Box 137013,
8 Sacramento, CA 95813-7013, prior to the effective date of this Decision and Order.

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10 DATED: 10-26-2020



Steve Chu, Counsel
Department of Real Estate

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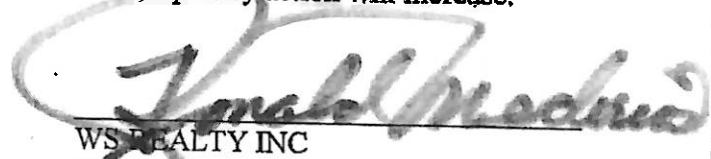
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We have read the Stipulation and Agreement. We understand that we are waiving rights given to us by the California Administrative Procedure Act, (including but not limited to sections 11521 and 11523 of the Government Code), and we willingly, intelligently, 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.

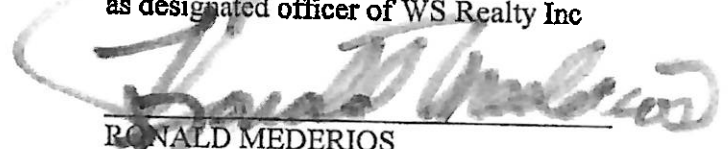
We can signify acceptance and approval of the terms and conditions of this Stipulation and Agreement by mailing the original signed Stipulation and Agreement to: Steve Chu, Department of Real Estate, 320 West 4th Street, Suite 350, Los Angeles, California 90013-1105. Steve Chu must receive the original signed Stipulation and Agreement or a copy faxed to (213) 576-6917 by November 30, 2020; 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: 10/12/20



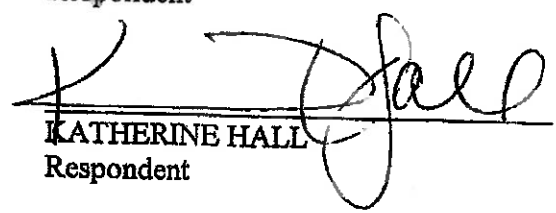
WS REALTY INC
Respondent
By RONALD MEDERIOS,
as designated officer of WS Realty Inc

DATED: 10/17/20



RONALD MEDERIOS
Respondent

DATED: 10/7/2020



KATHERINE HALL
Respondent

1 * * *

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

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

9 We can signify acceptance and approval of the terms and conditions of this
10 Stipulation and Agreement by mailing the original signed Stipulation and Agreement to:
11 Steve Chu, Department of Real Estate, 320 West 4th Street, Suite 350, Los Angeles,
12 California 90013-1105. Steve Chu must receive the original signed Stipulation and Agreement
13 or a copy faxed to (213) 576-6917 by November 30, 2020; if not, this Stipulation and
14 Agreement is invalid and void because the sum for the Commissioner's reasonable cost of the
15 investigation and enforcement which led to this disciplinary action will increase.

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17 DATED: _____

18 _____
19 WS REALTY INC
20 Respondent
21 By RONALD MEDERIOS,
22 as designated officer of WS Realty Inc

23
24 DATED: _____

25 _____
26 RONALD MEDERIOS
27 Respondent

DATED: _____

KATHERINE HALL
Respondent

1 DATED: 10-17-20

Frank Buda

2 Frank Buda
3 Counsel for Respondents
4 Approved as to Form

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6 The foregoing Stipulation and Agreement is hereby adopted by me as my
7 Decision in this matter as to Respondents WS REALTY INC, RONALD MEDERIOS, and
8 KATHERINE HALL, and shall become effective at 12 o'clock noon on
9 February 5, 2021.

10 IT IS SO ORDERED 12-18-20

11 DOUGLAS R. McCAULEY
12 REAL ESTATE COMMISSIONER

13 Douglas R. McCauley