

FILED

APR 10 2019

DEPT. OF REAL ESTATE
By Calabria

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9 BEFORE THE DEPARTMENT OF REAL ESTATE
10 STATE OF CALIFORNIA

11 * * *

12 In the Matter of the Accusation of) No. H-41344 LA
13 INTERNATIONAL SOLUTION)
14 GROUP CALIFORNIA INC., and) A C C U S A T I O N
15 CYRUS GLENN JULIAN,)
16 individually and as designated officer)
17 of International Solution Group)
18 California Inc.,)
19 Respondents.)

20 The Complainant, Veronica Kilpatrick, a Supervising Special Investigator of the
21 State of California, for cause of Accusation against INTERNATIONAL SOLUTION GROUP
22 CALIFORNIA INC. and CYRUS GLENN JULIAN, individually and as designated officer of
23 International Solution Group California Inc., (“Respondents”), is informed and alleges as
24 follows:

25 1.

26 The Complainant, Veronica Kilpatrick, acting in her official capacity as a
27 Supervising Special Investigator of the State of California, makes this Accusation against
INTERNATIONAL SOLUTION GROUP CALIFORNIA INC. and CYRUS GLENN JULIAN.

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1 2.

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

4 LICENSE HISTORY

5 3.

6 At all times mentioned, Respondent INTERNATIONAL SOLUTION GROUP
7 CALIFORNIA INC. ("INTERNATIONAL SOLUTION") was licensed and/or had license
8 rights issued by the Department of Real Estate ("Department") as a corporate real estate broker.
9 On April 9, 2018, INTERNATIONAL SOLUTION'S license expired. Pursuant to Code
10 section 10201, INTERNATIONAL SOLUTION retains renewal rights for two years. The
11 Department holds jurisdiction over the lapsed license, pursuant to Code section 10103.

12 4.

13 At all times mentioned, Respondent CYRUS GLENN JULIAN ("JULIAN") was
14 licensed and/or had license rights issued by the Department as a real estate broker.

15 5.

16 Respondent INTERNATIONAL SOLUTION was licensed by the Department as
17 a corporate real estate broker by and through JULIAN, as the designated officer and broker
18 responsible, pursuant to Code section 10159.2, for supervising the activities requiring a real
19 estate license conducted on behalf of INTERNATIONAL SOLUTION, or by
20 INTERNATIONAL SOLUTION'S officers, agents and employees.

21 FIRST CAUSE OF ACTION

22 LACK OF GOOD STANDING FOR CORPORATION

23 6.

24 Respondent INTERNATIONAL SOLUTION was not in good legal standing
25 with the Office of the Secretary of State for the State of California beginning
26 November 3, 2014, when INTERNATIONAL SOLUTION'S status became "suspended" and
27 remained suspended at least through September 28, 2017.

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1 7.

2 On or about January 9, 2017, Respondent INTERNATIONAL SOLUTION
3 through agent Respondent JULIAN, submitted an offer for buyers A. Lall and V. Lall to
4 purchase real property through a signed Residential Purchase Agreement.

5 8.

6 The lack of good legal standing of Respondent INTERNATIONAL SOLUTION
7 with the Office of the Secretary of State for the State of California and INTERNATIONAL
8 SOLUTION'S continued engagement in the business of a real estate broker while not in good
9 standing, as described in Paragraphs 6 and 7 above, was in violation of Regulations
10 section 2742, and constitute cause under Code sections 10177(d), 10177(f), and/or 10177(g) for
11 the suspension or revocation of all the licenses and license rights of INTERNATIONAL
12 SOLUTION.

13 SECOND CAUSE OF ACTION

14 FAILURE TO INFORM COMMISSIONER OF NEW ADDRESS

15 9.

16 From April 10, 2014, to May 4, 2017, the main office address maintained by
17 Respondent INTERNATIONAL SOLUTION with the Department was
18 9595 Wilshire Blvd Ste 900, Beverly Hills, CA 90212. On or about May 5, 2017,
19 INTERNATIONAL SOLUTION informed the Real Estate Commissioner of a changed main
20 office address at 7700 Irvine Center Dr Ste 800, Irvine, CA 92618.

21 10.

22 An April 3, 2017, investigation revealed that Respondent INTERNATIONAL
23 SOLUTION was conducting business at 7700 Irvine Center Dr Ste 800, Irvine, CA 92618. The
24 failure of INTERNATIONAL SOLUTION to inform to the Real Estate Commissioner of a
25 changed main office address no later than the next business day following the change is in
26 violation Code section 10162 and Regulations section 2715.

27 ///

1 11.

2 The conduct, acts, or omissions of Respondent INTERNATIONAL SOLUTION
3 as described in Paragraphs 9 and 10 above, constitute cause under Code sections 10165,
4 10177(d), and/or 10177(g) for the suspension or revocation of all the licenses and license rights
5 of INTERNATIONAL SOLUTION.

6 THIRD CAUSE OF ACTION

7 FAILURE TO DISCLOSE REAL ESTATE IDENTIFICATION NUMBER

8 12.

9 Respondent INTERNATIONAL SOLUTION did not disclose its real estate
10 identification number on solicitation materials intended to be the first point of contact with
11 consumers, including, but not limited to, an internet website, in violation of Code
12 sections 10140.6 and 10236.4 and Regulations section 2773, which constitutes cause under
13 Code sections 10177(d) and/or 10177(g) for the suspension or revocation of all the licenses and
14 license rights of INTERNATIONAL SOLUTION.

15 FOURTH CAUSE OF ACTION

16 USE OF UNLICENSED FICTITIOUS BUSINESS NAME

17 13.

18 Respondent INTERNATIONAL SOLUTION used the unlicensed fictitious
19 business name "ISG California" in violation of Code section 10159.5 and Regulations
20 section 2731, which constitutes cause under Code sections 10177(d) and/or 10177(g) for the
21 suspension or revocation of all the licenses and license rights of INTERNATIONAL
22 SOLUTION.

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1 FIFTH CAUSE OF ACTION

2 FAILURE TO SUPERVISE

3 14.

4 The conduct, acts, or omissions of Respondent JULIAN, as described in
5 Paragraphs 6 through 13 above, in failing to ensure compliance of the Real Estate Law by
6 Respondent INTERNATIONAL SOLUTION, are in violation of Code section 10159.2 and
7 Regulations section 2725 and constitute cause under Code sections 10177(d), 10177(g), and/or
8 10177(h) for the suspension or revocation of all the licenses and license rights of JULIAN.


9 15.

10 Code section 10106 provides, in pertinent part, that in any order issued in
11 resolution of a disciplinary proceeding before the Department of Real Estate, the Commissioner
12 may request the administrative law judge to direct a licensee found to have committed a
13 violation of this part to pay a sum not to exceed the reasonable costs of the investigation and
14 enforcement of the case.

15 WHEREFORE, Complainant prays that a hearing be conducted on the
16 allegations of this Accusation and that upon proof thereof, a decision be rendered imposing
17 disciplinary action against all the licenses and license rights of Respondents
18 INTERNATIONAL SOLUTION GROUP CALIFORNIA INC. and CYRUS GLENN JULIAN
19 under the Real Estate Law, for the cost of investigation and enforcement as permitted by law,
20 and for such other and further relief as may be proper under other applicable provisions of law.

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22 Dated at San Diego, California

23 this 26 day of March, 2019

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25 
26 Veronica Kilpatrick
27 Supervising Special Investigator

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cc: INTERNATIONAL SOLUTION GROUP CALIFORNIA INC.
CYRUS GLENN JULIAN
Veronica Kilpatrick
Sacto.