

FILED

JUN -3 2019

DEPT. OF REAL ESTATE
By *Al Sabir*

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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- 41374 LA
13 HOME PRO REALTY INC,) ACCUSATION
14 doing business as Home Pro Funding,)
15 Home Pro Mortgage, Home Pro)
16 Real Estate Group, Home Pro Realty,)
17 Neighborhood Financial Services,)
18 and Quality Closing Solutions,)
19 KELVIN ZEE, individually and as)
20 designated officer of Home Pro Realty Inc,)
and LAWRENCE ROBERT FRIEDMAN,)
Respondents.)

21 The Complainant, María Suárez, a Supervising Special Investigator of the State
22 of California, for cause of Accusation against HOME PRO REALTY INC, doing business as
23 Home Pro Funding, Home Pro Mortgage, Home Pro Real Estate Group, Home Pro Realty,
24 Neighborhood Financial Services, and Quality Closing Solutions, KELVIN ZEE, individually
25 and as designated officer of Home Pro Realty Inc, and LAWRENCE ROBERT FRIEDMAN
26 (“Respondents”), is informed and alleges as follows:

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1.

The Complainant, María Suárez, acting in her official capacity as a Supervising Special Investigator of the State of California, makes this Accusation against Respondents HOME PRO REALTY INC, KELVIN ZEE, and LAWRENCE ROBERT FRIEDMAN.

2.

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

LICENSE HISTORY

3.

At all times mentioned, Respondent HOME PRO REALTY INC ("HOME PRO REALTY") was licensed and/or had license rights issued by the Department of Real Estate ("Department") as a corporate real estate broker. HOME PRO REALTY also has a company mortgage loan originator license endorsement.

4.

At all times mentioned, Respondent KELVIN ZEE ("ZEE") was licensed and/or had license rights issued by the Department as a real estate broker. ZEE also has an individual mortgage loan originator license endorsement.

5.

Respondent HOME PRO REALTY is licensed by the Department as a corporate real estate broker by and through ZEE, 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 of HOME PRO REALTY, or by HOME PRO REALTY'S officers, agents and employees.

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At all times mentioned, Respondent LAWRENCE ROBERT FRIEDMAN (“FRIEDMAN”) was licensed and/or had license rights issued by the Department as a real estate salesperson. FRIEDMAN also has an individual mortgage loan originator license endorsement.

7.

Respondent FRIEDMAN is the owner of and has the authority to act on behalf of Respondent HOME PRO REALTY.

BROKERAGE
HOME PRO REALTY INC

8.

At all times mentioned, in the City of Anaheim, County of Orange, Respondent HOME PRO REALTY acted as a real estate broker, conducting licensed activities within the meaning of Code section 10131, subdivision (a) (sells, buys, or negotiates the purchase, sale or exchange of real property).

AUDIT
HOME PRO REALTY INC

9.

On September 28, 2017, the Department completed audit examinations of the books and records of Respondent HOME PRO REALTY pertaining to the activities described in Paragraph 8 which require a real estate license. The audit examinations covered a period of time from July 1, 2016, to June 30, 2017. The audit examinations revealed violations of the Code and the Regulations as set forth in the following paragraphs, and as more fully discussed in Audit Report LA160227 and LA170026 and the exhibits and workpapers attached to said audit report.

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11.

The conduct, acts, or omissions of Respondents HOME PRO REALTY and FRIEDMAN, described in Paragraph 10 above, violated the Code and the Regulations as set forth below:

<u>PARAGRAPH</u>	<u>PROVISIONS VIOLATED</u>
10(a)	Code section 10145 and Regulations sections 2831, 2950(d), and 2951 (HOME PRO REALTY)
10(b)	Code section 10145 and Regulations sections 2834 and 2951 (HOME PRO REALTY)
10(c)	Regulations section 2726 (HOME PRO REALTY)
10(d)	Code section 10176(g) and Regulations section 2830 (HOME PRO REALTY)
10(e)	Code section 10177(o) (HOME PRO REALTY and FRIEDMAN)

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


The foregoing violations constitute cause for the suspension or revocation of all the licenses, license endorsements, and license rights of Respondent FRIEDMAN under the Real Estate Law pursuant to the provisions of Code sections 10177(d), 10177(g), and/or 10177(o).

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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 HOME PRO REALTY INC, KELVIN ZEE, and LAWRENCE ROBERT
5 FRIEDMAN under the Real Estate Law, for the cost of audit, investigation, and enforcement as
6 permitted by law, and for such other and further relief as may be proper under other applicable
7 provisions of law.

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9 Dated at Los Angeles, California

10 this 28 day of May, 20 19

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13 María Suárez
14 Supervising Special Investigator

15 cc: HOME PRO REALTY INC
16 KELVIN ZEE
17 LAWRENCE ROBERT FRIEDMAN
18 María Suárez
19 Sacto.
20 Audits
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