

1 1. All issues which were to be contested and all evidence which was to be
2 presented by Complainant and Respondents at a formal hearing on the Accusation, which
3 hearing was to be held in accordance with the provisions of the Administrative Procedure Act
4 (“APA”), shall instead and in place thereof be submitted solely on the basis of the provisions of
5 this Stipulation and Agreement (“Stipulation”).

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

9 3. On June 17, 2019, Respondents HOME PRO REALTY INC and
10 LAWRENCE ROBERT FRIEDMAN filed a Notice of Defense, and on June 24, 2019,
11 Respondent KELVIN ZEE filed a Notice of Defense pursuant to section 11506 of the
12 Government Code for the purpose of requesting a hearing on the allegations in the Accusation.
13 Respondents hereby freely and voluntarily withdraw said Notices of Defense. Respondents
14 acknowledge that Respondents understand that by withdrawing said Notices of Defense,
15 Respondents will thereby waive Respondents’ right to require the Real Estate Commissioner
16 (“Commissioner”) to prove the allegations in the Accusation at a contested hearing held in
17 accordance with the provisions of the APA and that Respondents will waive other rights
18 afforded to Respondents in connection with the hearing such as the right to present evidence in
19 defense of the allegations in the Accusation and the right to cross-examine witnesses.

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

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1 b. No final determination be made after hearing or upon stipulation
2 that cause for disciplinary action against any of the real estate
3 licenses or license rights of Respondent occurred within two (2) years
4 from the effective date of this Decision and Order. Should such a
5 determination be made, the Commissioner may, in his discretion,
6 vacate and set aside the stay order and reimpose all or a portion of the
7 stayed suspension. Should no such determination be made, the stay
8 imposed herein shall become permanent.

9 2. All licenses and licensing rights of Respondent HOME PRO
10 REALTY INC are indefinitely suspended unless or until Respondent HOME PRO
11 REALTY INC pays, jointly and severally with Respondent KELVIN ZEE and Respondent
12 LAWRENCE ROBERT FRIEDMAN, the sum of \$6,056.22 for the Commissioner's cost of the
13 audit which led to this disciplinary action pursuant to Code section 10148. Said payment shall
14 be in the form of a cashier's check made payable to the Department of Real Estate. The audit
15 cost must be delivered to the Department of Real Estate, Flag Section at P.O. Box 137013,
16 Sacramento, CA 95813-7013, prior to the effective date of this Decision and Order.

17 3. All licenses and licensing rights of Respondent HOME PRO REALTY
18 INC are indefinitely suspended unless or until Respondent HOME PRO REALTY INC pays,
19 jointly and severally with Respondent KELVIN ZEE and Respondent LAWRENCE ROBERT
20 FRIEDMAN, the sum of \$1,870.45 for the Commissioner's reasonable cost of the investigation
21 and enforcement which led to this disciplinary action. Said payment shall be in the form of a
22 cashier's check made payable to the Department of Real Estate. The investigative and
23 enforcement costs must be delivered to the Department of Real Estate, Flag Section at
24 P.O. Box 137013, Sacramento, CA 95813-7013, prior to the effective date of this Decision and
25 Order.

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1 b. No final determination be made after hearing or upon stipulation
2 that cause for disciplinary action against any of the real estate
3 licenses or license rights of Respondent occurred within two (2) years
4 from the effective date of this Decision and Order. Should such a
5 determination be made, the Commissioner may, in his discretion,
6 vacate and set aside the stay order and reimpose all or a portion of the
7 stayed suspension. Should no such determination be made, the stay
8 imposed herein shall become permanent.

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

19 3. All licenses and licensing rights of Respondent KELVIN ZEE are
20 indefinitely suspended unless or until Respondent KELVIN ZEE pays, jointly and severally
21 with Respondent HOME PRO REALTY INC and Respondent LAWRENCE ROBERT
22 FRIEDMAN, the sum of \$6,056.22 for the Commissioner's cost of the audit which led to this
23 disciplinary action pursuant to Code section 10148. Said payment shall be in the form of a
24 cashier's check made payable to the Department of Real Estate. The audit cost must be
25 delivered to the Department of Real Estate, Flag Section at P.O. Box 137013,
26 Sacramento, CA 95813-7013, prior to the effective date of this Decision and Order.

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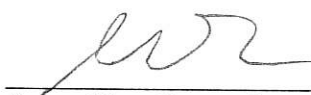
2. All licenses and licensing rights of Respondent LAWRENCE ROBERT

FRIEDMAN are indefinitely suspended unless or until Respondent LAWRENCE ROBERT FRIEDMAN pays, jointly and severally with Respondent HOME PRO REALTY INC and Respondent KELVIN ZEE, the sum of \$6,056.22 for the Commissioner's cost of the audit which led to this disciplinary action pursuant to Code section 10148. Said payment shall be in the form of a cashier's check made payable to the Department of Real Estate. The audit cost must be delivered to the Department of Real Estate, Flag Section at P.O. Box 137013, Sacramento, CA 95813-7013, prior to the effective date of this Decision and Order.

3. All licenses and licensing rights of Respondent LAWRENCE ROBERT

FRIEDMAN are indefinitely suspended unless or until Respondent LAWRENCE ROBERT FRIEDMAN pays, jointly and severally with Respondent HOME PRO REALTY INC and Respondent KELVIN ZEE, the sum of \$1,870.45 for the Commissioner's reasonable cost of the investigation and enforcement which led to this disciplinary action. Said payment shall be in the form of a cashier's check made payable to the Department of Real Estate. The investigative and enforcement costs must be delivered to the Department of Real Estate, Flag Section at P.O. Box 137013, Sacramento, CA 95813-7013, prior to the effective date of this Decision and Order.

DATED: 12-5-2019



Steve Chu, Counsel
Department of Real Estate

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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 by
11 December 16, 2019, to: Steve Chu, Department of Real Estate, 320 West 4th Street, Suite 350,
12 Los Angeles, California 90013-1105.

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14 DATED: 11/19/19

Kelvin Zee
HOME PRO REALTY INC
Respondent
By KELVIN ZEE, as
designated officer of Home Pro Realty Inc

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18 DATED: 11/18/19

Kelvin Zee
KELVIN ZEE
Respondent

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21 DATED: _____

LAWRENCE ROBERT FRIEDMAN
Respondent

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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.

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10 Stipulation and Agreement by mailing the original signed Stipulation and Agreement by
11 December 16, 2019, to: Steve Chu, Department of Real Estate, 320 West 4th Street, Suite 350,
12 Los Angeles, California 90013-1105.

13
14 DATED: 11/25/19



15 _____
16 HOME PRO REALTY INC
17 Respondent
18 By KELVIN ZEE, as
19 designated officer of Home Pro Realty Inc

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21 DATED: _____

22 _____
23 KELVIN ZEE
24 Respondent

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26 DATED: 11/25/19

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28 LAWRENCE ROBERT FRIEDMAN
29 Respondent

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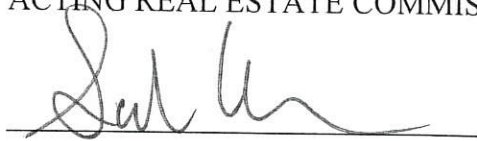
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The foregoing Stipulation and Agreement is hereby adopted by me as my
Decision in this matter as to Respondent HOME PRO REALTY INC, Respondent KELVIN
ZEE, and Respondent LAWRENCE ROBERT FRIEDMAN, and shall become effective at
12 o'clock noon on February 7, 2020 .

IT IS SO ORDERED December 26, 2019

SANDRA KNAU
ACTING REAL ESTATE COMMISSIONER



A handwritten signature in cursive script, appearing to read 'Sandra Knaus', is written over a horizontal line.