MAY 0 4 2022

DEPT. OF REAL ESTATE

By Emmines

BEFORE THE DEPARTMENT OF REAL ESTATE STATE OF CALIFORNIA

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In the Matter of the Accusation of)	No. H-41700 LA
KEYVEST COMPANY,)	STIPULATION AND AGREEMENT
doing business as)	
Keystone Asset Management, and)	
LAURENCE STANLEY GOLDSTEIN,)	4.5
individually and as designated officer of)	4
Keyvest Company,)	₩.
)	
Respondents.)	
•)	

It is hereby stipulated by and between Respondent LAURENCE STANLEY GOLDSTEIN, represented by Scott Harris, ("Respondents") and the Complainant, acting by and through Steve Chu, Counsel for the Department of Real Estate ("Department"), as follows for the purpose of settling and disposing of the Accusation filed on June 19, 2020, in this matter:

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

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- 2. Respondent has received, read and understands the Statement to Respondent, the Discovery Provisions of the APA, and the Accusation filed by the Department of Real Estate in this proceeding.
- 3. On July 1, 2020, Respondent LAURENCE STANLEY GOLDSTEIN filed a Notice of Defense pursuant to Section 11506 of the Government Code for the purpose of requesting a hearing on the allegations in the Accusation. Respondent hereby freely and voluntarily withdraws said Notice of Defense. Respondent acknowledges that Respondent understands that by withdrawing said Notice of Defense, Respondent will thereby waive Respondent's right to require the Real Estate Commissioner ("Commissioner") to prove the allegations in the Accusation at a contested hearing held in accordance with the provisions of the APA and that Respondent will waive other rights afforded to Respondent in connection with the hearing such as the right to present evidence in defense of the allegations in the Accusation and the right to cross-examine witnesses.
- 4. Respondent, pursuant to the limitations set forth below, hereby admits that the factual allegations only after Respondent became designated officer on May 18, 2018, in the Accusation filed in this proceeding are true and correct and the Commissioner shall not be required to provide further evidence to prove such allegations.
- 5. It is understood by the parties that the Real Estate Commissioner may adopt the Stipulation as his Decision in this matter, thereby imposing the penalty and sanctions on Respondent's real estate licenses and license rights as set forth in the below Order. In the event that the Commissioner in his discretion does not adopt the Stipulation, it shall be void and of no effect, and Respondent shall retain the right to a hearing and proceeding on the Accusation under all the provisions of the APA and shall not be bound by any admission or waiver made herein.

The Order or any subsequent Order of the Commissioner made pursuant 6. 1 to this Stipulation shall not constitute an estoppel, merger or bar to any further administrative or 2 civil proceedings by the Department with respect to any matters which were not specifically 3 alleged to be causes for the Accusation in this proceeding. 4 **DETERMINATION OF ISSUES** 5 By reason of the foregoing stipulations, admissions, and waivers, and solely for 6 the purpose of settlement of the pending Accusation without a hearing, it is stipulated and 7 agreed that the following Determination of Issues shall be made: 8 I. 9 The conduct, acts, and/or omissions of Respondent LAURENCE STANLEY 10 GOLDSTEIN, as described in the Accusation and which occurred only after Respondent 11 became designated officer on May 18, 2018, constitute cause for the suspension or revocation 12 of all real estate licenses and license rights of Respondent LAURENCE STANLEY 13 GOLDSTEIN under California Business and Professions Code ("Code") section 10177(h) for 14 violation of Code section 10159.2 and Regulations section 2725. 15 **ORDER** 16 I. 17 Respondent LAURENCE STANLEY GOLDSTEIN is publicly reproved. 18 1. 19 /// 20 21 /// 22 23 24 25 26

- 2. All licenses and licensing rights of Respondent LAURENCE STANLEY GOLDSTEIN are indefinitely suspended unless or until Respondent provides proof satisfactory to the Commissioner of having taken and successfully completed the continuing education course on trust fund accounting and handling specified in Code section 10170.5(a)(3). Proof of satisfaction of this requirement includes evidence that Respondent has successfully completed the trust fund accounting and handling continuing education course within one hundred twenty (120) days prior to the effective date of this Decision and Order. Proof of completion of the trust fund accounting and handling course 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 LAURENCE STANLEY GOLDSTEIN are indefinitely suspended unless or until Respondent LAURENCE STANLEY GOLDSTEIN pays, jointly and severally with Respondent KEYVEST COMPANY, the sum of \$7,092.48 for the Commissioner's cost of the audit which led to this disciplinary action pursuant to Code section 10148. Respondent shall pay such cost within sixty (60) days of receiving an invoice therefore from the Commissioner. 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.

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All licenses and licensing rights of Respondent LAURENCE STANLEY 4. GOLDSTEIN are indefinitely suspended unless or until Respondent LAURENCE STANLEY GOLDSTEIN pays, jointly and severally with Respondent KEYVEST COMPANY, the sum of \$2,869.95 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: 3-3-2022 Steve Chu, Counsel Department of Real Estate /// ///

From: Scott Harris 14-Jan-Zuzz

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i have read the Stipulation and Agreement. I understand that I am waiving rights given to me by the California Administrative Procedure Act, (including but not limited to Sections 11521 and 11523 of the Government Code), and I willingly, intelligently, and voluntarily walte 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.

lagree, acknowledge, and understand that I cannot rescind or amend this Stipulation and Agreement.

I can signify acceptance and approval of the terms and conditions of this Supulation and Agreement by mailing the original signed Stipulation and Agreement by January 18, 2022, to. Steve Chu, Department of Real Estate, 320 West 4th Street, Suite 350, Los Angeles, California 90013-1105.

DATED:

January 18, 2022 DATED

Respondent

Scott Harris

Counsel for Respondent Approved as to Form

IT IS SO ORDERED 4.8.22

DOUGLAS R. McCAULEY REAL ESTATE COMMISSIONER

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