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**FILED**  
**SEP 11 2020**  
**DEPT. OF REAL ESTATE**  
By *[Signature]*

7 BEFORE THE DEPARTMENT OF REAL ESTATE  
8 STATE OF CALIFORNIA

9 \* \* \*

10  
11 In the Matter of the Accusation of ) No. H-41776 LA  
12 )  
13 JAMES FORREST GRANT ) **ACCUSATION**  
14 Respondent. )  
15 )  
16 )

17 The Complainant, Veronica Kilpatrick, a Supervising Special Investigator of the  
18 State of California, for cause of Accusation against JAMES FORREST GRANT, a.k.a. Forrest  
19 Grant, ("Respondent"), alleges as follows:

20 1.

21 The Complainant, Veronica Kilpatrick, a Supervising Special Investigator of the  
22 State of California, makes this Accusation in her official capacity.

23 2.

24 All references to the "Code" are to the California Business and Professions Code  
25 and all references to "Regulations" are to Title 10, Chapter 6, California Code of Regulations.  
26

27 DRE ACCUSATION: JAMES FORREST GRANT



1                                    **APPLICABLE SECTIONS OF THE REAL ESTATE LAW**

2                                    **License Required**

3                                    **Code Section 10130**

4                                    5.

5                                    Pursuant to Code Section 10130 *License Required*:

6                                    “It is unlawful for any person to engage in the business of, act in the capacity of,  
7 advertise as, or assume to act as a real estate broker or a real estate salesperson within this state  
8 without first obtaining a real estate license from the department, or to engage in the business of,  
9 act in the capacity of, advertise as, or assume to act as a mortgage loan originator within this state  
10 without having obtained a license endorsement. The commissioner may prefer a complaint for  
11 violation of this section before any court of competent jurisdiction, and the commissioner and his  
12 or her counsel, deputies, or assistants, may assist in presenting the law or facts at the trial.

13 Prosecution of Violations: It is the duty of the district attorney of each county in this state to  
14 prosecute all violations of this section in their respective counties in which the violations occur.”

15                                    **Trust Fund Handling**

16                                    **Code Section 10145 and Regulations 2831 and 2832**

17                                    6.

18                                    Pursuant to Code Section 10145 *Handling of Trust Funds* (selected portions):

19                                    “(a)(1): A real estate broker who accepts funds belonging to others in connection  
20 with a transaction subject to this part shall deposit all those funds that are not immediately placed  
21 into a neutral escrow depository or into the hands of the broker’s principal, into a trust fund  
22 account maintained by the broker in a bank or recognized depository in this state. All funds  
23 deposited by the broker in a trust account shall be maintained there until disbursed by the broker  
24 in accordance with instructions from the person entitled to the funds.

1 (2) Withdrawals may be made from a trust fund account of an individual broker  
2 only upon the signature of that broker, or in the case of a corporate broker, only upon the  
3 signature of an officer through whom the corporation is licensed pursuant to Section 10158 or  
4 10211, or one, or more, of the following persons if specifically authorized in writing by the  
5 individual broker or officer:

6 (A) A real estate salesperson licensed to the broker.

7 (B) Another broker acting pursuant to a written agreement with the  
8 individual broker that conforms to the requirements of this part and any  
9 regulations promulgated pursuant to this part.

10 (C) An unlicensed employee of the individual broker, if the broker has  
11 fidelity bond coverage equal to at least the maximum amount of the trust  
12 funds to which the unlicensed employee has access at any time. For  
13 purposes of this section, bonds providing coverage may be written with a  
14 deductible of up to 5 percent of the coverage amount. For bonds with a  
15 deductible, the employing broker shall have evidence of financial  
16 responsibility that is sufficient to protect members of the public against a  
17 loss subject to the deductible amount.

18 Evidence of financial responsibility shall include one or more of the  
19 following:

20 (i) Separate fidelity bond coverage adequate to cover the amount  
21 of the fidelity bond deductible.

22 (ii) A cash deposit held in a separate account, apart from other  
23 funds of the broker, the broker's employees, or the broker's  
24 principals, in a bank or recognized depository in this state adequate  
25 to cover the amount of the fidelity bond deductible and held  
26

1 exclusively and solely for the purpose of paying the fidelity bond  
2 deductible amount.

3 (iii) Any other evidence of financial responsibility approved by the  
4 commissioner.

5 (3) An arrangement under which a person enumerated in subparagraph (A),(B),  
6 or (C) of paragraph (2) is authorized to make withdrawals from a trust fund account of a broker  
7 shall not relieve an individual broker, nor the broker-officer of a corporate broker licensee, from  
8 responsibility or liability as provided by law in handling trust funds in the broker's custody.

9 . . .

10 (4)(b) A real estate broker acting as a principal pursuant to Section 10131.1  
11 shall place all funds received from others for the purchase of real property sales contracts or  
12 promissory notes secured directly or collaterally by liens on real property in a neutral escrow  
13 depository unless delivery of the contract or notes is made simultaneously with the receipt of the  
14 purchase funds.

15 . . .

16 (4)(g) The broker shall maintain a separate record of the receipt and disposition  
17 of all funds described in subdivisions (a) and (b), including any interest earned on the funds..."

18 7.

19 Pursuant to Regulation 2831 *Trust Fund Records To Be Maintained:*

20 "(a) Every broker shall keep a record of all trust funds received, including  
21 uncashed checks held pursuant to instructions of his or her principal. This record, including  
22 records maintained under an automated data processing system, shall set forth in chronological  
23 sequence the following information in columnar form:

24 (1) Date trust funds received.

25 (2) From whom trust funds received.

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DRE ACCUSATION: JAMES FORREST GRANT

1 (3) Amount received.

2 (4) With respect to funds deposited in an account, date of said deposit.

3 (5) With respect to trust funds previously deposited to an account, check  
4 number and date of related disbursement.

5 (6) With respect to trust funds not deposited in an account, identity of  
6 other depository and date funds were forwarded.

7 (7) Daily balance of said account.

8 (b) For each bank account which contains trust funds, a record of all trust funds  
9 received and disbursed shall be maintained in accordance with subdivision (a) or (c).

10 (c) Maintenance of journals of account cash receipts and disbursements, or similar  
11 records, or automated data processing systems, including computer systems and electronic  
12 storage and manipulation of information and documents, in accordance with generally accepted  
13 accounting principles, shall constitute compliance with subdivision (a) provided that such  
14 journals, records, or systems contain the elements required by subdivision (a) and that such  
15 elements are maintained in a format that will readily enable tracing and reconciliation in  
16 accordance with Section 2831.2.

17 (d) Nothing in this section shall be construed to permit a violation of Section  
18 10145 of the Code.

19 (e) A broker is not required to keep records pursuant to this section of checks  
20 which are written by a principal, given to the broker and made payable to third parties for the  
21 provision of services, including but not limited to escrow, credit and appraisal services, when  
22 the total amount of such checks for any transaction from that principal does not exceed \$1,000.  
23 Upon request of the Department or the maker of such checks, a broker shall account for the  
24 receipt and distribution of such checks. A broker shall retain for three years copies of receipts  
25 issued or obtained in connection with the receipt and distribution of such checks.”

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8.

Pursuant to Regulation 2832 *Trust Fund Handling*:

“(a) Compliance with Section 10145 of the Code requires that the broker place funds accepted on behalf of another into the hands of the owner of the funds, into a neutral escrow depository or into a trust fund account in the name of the broker, or in a fictitious name if the broker is the holder of a license bearing such fictitious name, as trustee at a bank or other financial institution not later than three business days following receipt of the funds by the broker or by the broker’s salesperson.

(b) Except as expressly provided by subdivision (d) of Section 10145 of the Code or by a regulation in this article, the account into which the trust funds are deposited shall not be an interest bearing account for which prior written notice can by law or regulation be required by the financial institution as a condition to the withdrawal of funds.

(c) A check received from the offeror may be held uncashed by the broker until acceptance of the offer if

(1) the check by its terms is not negotiable by the broker or if the offeror has given written instructions that the check shall not be deposited nor cashed until acceptance of the offer and

(2) the offeree is informed that the check is being so held before or at the time the offer is presented for acceptance.

(d) In these circumstances if the offeror’s check was held by the broker in accordance with subdivision (c) until acceptance of the offer, the check shall be placed into a neutral escrow depository or the trust fund account, or into the hands of the offeree if offeror and offeree expressly so provide in writing, not later than three business days following acceptance of the offer unless the broker receives written authorization from the offeree to continue to hold the check.

1 (e) Notwithstanding the provisions of subdivisions (a) and (d), a real estate broker  
2 who is not licensed under the Escrow Law (Section 17000, et seq., of the Financial Code) when  
3 acting in the capacity of an escrow holder in a real estate purchase and sale, exchange or loan  
4 transaction in which the broker is performing acts for which a real estate license is required shall  
5 place all funds accepted on behalf of another into the hands of the owner of the funds, into a  
6 neutral escrow depository or into a trust fund account in the name of the broker, or in a fictitious  
7 name if the broker is the holder of a license bearing such fictitious name, as trustee at a bank or  
8 other financial institution not later than the next business day following receipt of the funds by  
9 the broker or by the broker's salesperson."

10 **Retention of Records – Chargeable Audits – Cost Recovery – Penalties for Unlawful**

11 **Destruction of Records**

12 **Code Section 10148**

13 9.

14 Pursuant to Code Section 10148 *Retention of Records – Chargeable Audits – Cost*  
15 *Recovery – Penalties for Unlawful Destruction of Records:*

16 "(a) A licensed real estate broker shall retain for three years copies of all listings,  
17 deposit receipts, canceled checks, trust records, and other documents executed by him or her or  
18 obtained by him or her in connection with any transactions for which a real estate broker license  
19 is required. The retention period shall run from the date of the closing of the transaction or from  
20 the date of the listing if the transaction is not consummated. After notice, the books, accounts,  
21 and records shall be made available for examination, inspection, and copying by the  
22 commissioner or his or her designated representative during regular business hours; and shall,  
23 upon the appearance of sufficient cause, be subject to audit without further notice, except that the  
24 audit shall not be harassing in nature. This subdivision shall not be construed to require a  
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DRE ACCUSATION: JAMES FORREST GRANT



1 licensed real estate broker to retain electronic messages of an ephemeral nature, as described in  
2 subdivision (d) of Section 1624 of the Civil Code.

3 (b) The commissioner shall charge a real estate broker for the cost of any audit, if  
4 the commissioner has found, in a final desist and refrain order issued under Section 10086 or in a  
5 final decision following a disciplinary hearing held in accordance with Chapter 5 (commencing  
6 with Section 11500) of Part 1 of Division 3 of Title 2 of the Government Code that the broker  
7 has violated Section 10145 or a regulation or rule of the commissioner interpreting Section  
8 10145.

9 (c) If a broker fails to pay for the cost of an audit as described in subdivision (b)  
10 within 60 days of mailing a notice of billing, the commissioner may suspend or revoke the  
11 broker's license or deny renewal of the broker's license. The suspension or denial shall remain in  
12 effect until the cost is paid or until the broker's right to renew a license has expired.

13 (d) The commissioner may maintain an action for the recovery of the cost of an  
14 audit in any court of competent jurisdiction. In determining the cost incurred by the  
15 commissioner for an audit, the commissioner may use the estimated average hourly cost for all  
16 persons performing audits of real estate brokers.

17 (e) The bureau may suspend or revoke the license of any real estate broker, real  
18 estate salesperson, or corporation licensed as a real estate broker, if the real estate broker, real  
19 estate salesperson, or any director, officer, employee, or agent of the corporation licensed as a  
20 real estate broker knowingly destroys, alters, conceals, mutilates, or falsifies any of the books,  
21 papers, writings, documents, or tangible objects that are required to be maintained by this section  
22 or that have been sought in connection with an investigation, audit, or examination of a real  
23 estate licensee by the commissioner."

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1 **False or Fictitious Business Name**

2 **Code Section 10159.5 and Regulation 2731**

3 10.

4 Pursuant to Code Section 10159.5(a)(1) *Fictitious Name*:

5 “Every person applying for a license under this chapter who desires to have the  
6 license issued under a fictitious business name shall file with his or her application a certified  
7 copy of his or her fictitious business name statement filed with the county clerk pursuant to  
8 Chapter 5 (commencing with Section 17900) of Part 3 of Division 7.”

9 11.

10 Pursuant to Regulation 2731(a) *Use of False or Fictitious Name*: “A licensee shall  
11 not use a fictitious name in the conduct of any activity for which a license is required under the  
12 Real Estate Law unless the licensee is the holder of a license bearing the fictitious business  
13 name.”

14 **Grounds for Revocation or Suspension**

15 **Code Section 10176 (selected portions)**

16 12.

17 Pursuant to Code Section 10176 *Grounds for Revocation or Suspension*:

18 “The commissioner may, upon his or her own motion, and shall, upon the verified  
19 complaint in writing of any person, investigate the actions of any person engaged in the business  
20 or acting in the capacity of a real estate licensee within this state, and he or she may temporarily  
21 suspend or permanently revoke a real estate licensee at any time where the licensee, while a real  
22 estate licensee, in performing or attempting to perform any of the acts within the scope of this  
23 chapter has been guilty of any of the following:

24 (a) Making any substantial misrepresentation...”

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DRE ACCUSATION: JAMES FORREST GRANT

1 **Further Grounds for Disciplinary Action**

2 **Code Section 10177 (selected portions)**

3 13.

4 Pursuant to Code Section 10177 *Further Grounds for Disciplinary Action*:

5 “The commissioner may suspend or revoke the license of a real estate licensee,  
6 delay the renewal of a license of a real estate licensee, or deny the issuance of a license to an  
7 applicant, who has done any of the following:

8 . . .

9 (d) Willfully disregarded or violated the Real Estate Law (Part 1 (commencing  
10 with Section 10000)) or Chapter 1 (commencing with Section 11000) of Part 2 or the rules and  
11 regulations of the commissioner for the administration and enforcement of the Real Estate Law  
12 and Chapter 1 (commencing with Section 11000) of Part 2.”

13 . . .

14 (g) Demonstrated negligence or incompetence in performing an act for which he  
15 or she is required to hold a license...”

16 **DRE AUDIT LA 190024: JAMES FORREST GRANT**

17 **PROPERTY MANAGEMENT ACTIVITY**

18 14.

19 On March 30, 2020, the DRE completed its audit examinations of the books and  
20 records of Respondent GRANT pertaining to his property management activities (LA 190024),  
21 which require a real estate license, pursuant to Code Section 10131(b). The audit examination  
22 covered a period of time beginning on April 1, 2018 and ending on October 31, 2019 (“audit  
23 examination period” or “audit period”), and was performed between November 7, 2019 and  
24 November 18, 2019. The final report of March 30, 2020 revealed violations of the Code and the  
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1 Regulations as set forth in the following paragraphs, and more fully discussed in the Audit  
2 Report Transmittal and Report for LA 190024.

3 15.

4 GRANT's DRE License Information During Entrance Interview

5 A. At the time of the audit entrance interview on November 7, 2019, GRANT  
6 indicated that he was the D.O. for two (2) corporations of which he was the 100% owner:  
7 Affordable Mortgage Lending Inc. ("AML") (DRE license ID 01952313, expiring on January  
8 18, 2023) and Forrest G. Realty ("FGR") (DRE license ID 01952309, expired as of August 11,  
9 2018).

10 B. As of March 6, 2020, AMLI had no active DBAs, no branch offices and no  
11 RES employees under its license. Between June 6, 2016 and August 11, 2018, AMLI had one  
12 (1) DBA under its license for Caldirect Funding.

13 C. As of March 6, 2020, FGR had no active DBAs, no branch offices and no RES  
14 employees under its license. Between March 9, 2015 and August 12, 2018, FGR had one (1)  
15 DBA under its license for Legend Realty. According to California Secretary of State records,  
16 FGR was suspended by the Franchise Tax Board ("FTB") on DATE. (According to GRANT,  
17 FGR was suspended for back taxes owed to the FTB.)

18 16.

19 GRANT's Property Management Activities

20 According to GRANT's telephone conversation with the DRE auditor on  
21 September 12, 2019, he only performed sales and mortgage loan activities. However, at the  
22 November 7, 2019 entrance interview, GRANT revealed that he performed property management  
23 activities for property owner M.Z., and managed two (2) duplexes for M.Z., located at 1807 and  
24 1807 ½ E. 107<sup>th</sup> St., Los Angeles, CA 90002 ("107<sup>th</sup> St. property"). According to GRANT, he  
25 managed four (4) units total for M.Z. and charged management fees in the amount of six percent  
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DRE ACCUSATION: JAMES FORREST GRANT

1 (6%) of the rents collected. Also at the November 7, 2019 entrance interview, GRANT stated to  
2 the DRE auditor that he managed both at the 107<sup>th</sup> St. property and property located at 112 and  
3 114 91<sup>st</sup> St., managing both properties between July 2018 and December 2018.

4 17.

5 Bank Account

6 During the audit period, GRANT did not maintain a trust account for his property  
7 management activities. For the audit examination, GRANT provided the bank statements and  
8 account application he maintained for AMLI:

9 Bank Account - Account #####-4566 ("B/A 1") – opened 12/7/17

10 \* Bank: E\*TRADE Securities LLC, P.O. Box 484, Jersey City, NJ 07303

11 \* Account Title: Affordable Mortgage Lending, Inc. dba Caldirect Funding

12 \* Signatory: JAMES F. GRANT

13 \* Signatures required: 1

(Dates of Bank Reconciliation: as of May 31, 2019 and May 16, 2018)

14 During the audit period, GRANT maintained B/A 1 for his mortgage loan activity and was used  
15 for at least two (2) property management related disbursements to property owner M.Z.: (1)  
16 check no. 1007 dated 8/9/18 in the amount \$2,200.00 and (2) check no. 1012 dated 10/15/18 in  
17 the amount \$4,000.00.

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20.

**Trust Fund Handling**

**(Code Section 10145 and Regulation 2832)**

A. On November 7, 2019 (verbally) and on November 18, 2019 (written), GRANT represented to the DRE that all tenants paid in cash. On November 22, 2019, GRANT provided the DRE auditor a revised statement that there was a tenant that paid twice by way of checks written to him personally. GRANT failed to deposit rents received from tenants per the instructions of property owner M.Z., which requested that said funds be deposited "24 hrs [sic] +after receipt" into a trust account. GRANT did not maintain a trust account for the handling of trust funds collected on behalf of property owner M.Z.; nor did GRANT deposit trust funds collected on behalf of property owner M.Z. into a trust account, in violation of **Code Section 10145 and Regulation 2832**.

21.

**Trust Account Withdrawals**

**(Code Section 10145 and Regulation 2831)**

A. During the audit period, GRANT did not provide and maintain a control record for B/A 1, which was used to send proceeds to property owner M.Z. at least twice by check, as described in Paragraph 17 above, in violation of **Code Section 10145 and Regulation 2831**.

B. According to GRANT, he collected trust funds from tenants in the form of cash and checks. Based on the property management ledger provided, GRANT did not maintain a complete and accurate record of trust funds received and disbursed related to property management activities for property owner M.Z. The property management ledger provided was incomplete and missing some of the following information: date that trust funds were received; date of deposit; check number; date of disbursement; account number used for the depository of

1 trust funds; and the daily balance of the account, in violation of **Code Section 10145 and**  
2 **Regulation 2831.**

3 22.

4 **Misrepresentation**

5 **(Code Section 10176(a))**

6 According to the lease agreements examined during the audit period, GRANT  
7 misrepresented himself as the landlord when he was in fact an agent representing property owner  
8 M.Z. for the two properties described in Paragraph 16. In the two (2) lease agreements examined  
9 for the 107<sup>th</sup> St. property, "Forrest Grant" was listed as "Landlord," in violation of **Code Section**  
10 **10176(a).**

11 23.

12 **Use of False or Fictitious Business Name, License Required**

13 **(Code Section 10159.5 and Regulation 2731 and Code Section 10130)**

14 During the audit period, GRANT conducted property management activity using  
15 unlicensed fictitious business names ("FBN") "Forrest G. Realty" and "Forrest G Realty Inc" in  
16 all of the lease agreements examined. Forrest G. Realty (FGR) was licensed by the DRE as a real  
17 estate corporation ("REC") until its license expiration of August 11, 2018; notwithstanding the  
18 expiration of its REC license, FGR continued to perform property management activities without  
19 a valid real estate license subsequent to August 11, 2018, in violation of **Code Section 10130.**

20 FGR is not, and has never been, a licensed DBA under GRANT's REB license; GRANT  
21 conducted property management activities using the FBN of "Forrest G. Realty" when he was not  
22 a holder of a license bearing such name is in violation of **Code Section 10159.5 and Regulation**  
23 **2731.**

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1 24.

2 **Retention of Records**

3 **(Code Section 10148)**

4 A. GRANT failed to provide for the audit examination some of the requested  
5 books, accounts and records related to his property management activities during the subject  
6 audit period, in violation of **Code Section 10148**.

7 B. A *subpoena duces tecum* was served on GRANT by DRE special investigator  
8 Ginsheng Yee on November 7, 2019 to produce the books and records related to property  
9 management activities performed by GRANT on November 18, 2019 at 10:30 A.M. at the DRE's  
10 Los Angeles District Office located at 320 W. 4<sup>th</sup> Street, Suite 350, Los Angeles, CA 90013  
11 ("LADO").

12 1. On November 15, 2019, GRANT requested that the DRE Auditor  
13 ("auditor") meet at his main office on November 18, 2019 instead of at the  
14 LADO.

15 2. On November 18, 2019, the auditor went to GRANT's main office as  
16 agreed upon on November 15, 2019. Upon arrival to GRANT's office at  
17 9:30 A.M., the office was locked. While still outside of the locked office,  
18 the auditor called GRANT on his cell phone and could hear a phone  
19 ringing from the other side of the locked office door. GRANT answered  
20 the phone call and informed the auditor that he sent an e-mail to her at  
21 7:00 A.M. on the same day to change the appointment time to 12:30 P.M.  
22 and the location back to the LADO.

23 3. The DRE auditor returned to the LADO. When GRANT failed to  
24 appear for the agreed-upon audit appointment at 12:30 P.M., the auditor  
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1 called GRANT on his cell phone; GRANT stated that he was still printing  
2 documents and would arrive to the LADO before 5:00 P.M., but did not  
3 specify a time.

4 4. At 4:30 P.M. on November 18, 2019, GRANT arrived to the LADO and  
5 provided the auditor with only limited records for the audit examination,  
6 and indicated that he would need more time to locate the documents  
7 requested by the auditor.

8 5. The auditor granted a deadline extension of time to GRANT, to  
9 November 22, 2019 for GRANT's production of the subpoenaed books  
10 and records.

11 6. On November 22, 2019, the auditor received, via e-mail, additional  
12 property management records from GRANT. In addition, GRANT  
13 attached a revised statement of the same date and a revised property  
14 management ledger with transactions from July 2018 to December 2018.  
15 (The previous ledger he provided on November 18, 2019 included only  
16 transactions from July 2018 to October 2018.)

17 GRANT failed to produce all of his books and records related to property management activities  
18 conducted during the audit period April 1, 2018 through October 31, 2019, in violation of **Code**  
19 **Section 10148.**

20 25.

21 **Additional Violations of the Real Estate Law**

22 The overall conduct of Respondent GRANT is violative of the Real Estate Law  
23 and constitutes cause for the suspension or revocation of his real estate license and license rights  
24 under the provisions of **Code Section 10177(g)** for negligence and **Code Section 10177(d)** for  
25 willful disregard of the Real Estate Law.

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DRE ACCUSATION: JAMES FORREST GRANT

1 **COSTS**

2 **Investigation and Enforcement Costs**

3 26.

4 **Code Section 10106** provides, in pertinent part, that in any order issued in  
5 resolution of a disciplinary proceeding before the Department of Real Estate, the Commissioner  
6 may request the administrative law judge to direct a licensee found to have committed a violation  
7 of this part to pay a sum not to exceed the reasonable costs of the investigation and enforcement  
8 of the case.

9 **Audit Costs**

10 27.

11 **Code Section 10148(b)** provides, in pertinent part, the Commissioner shall charge  
12 a real estate broker for the cost of any audit, if the Commissioner has found in a final decision  
13 following a disciplinary hearing that the broker has violated Code section 10145 or a regulation  
14 or rule of the Commissioner interpreting said section.

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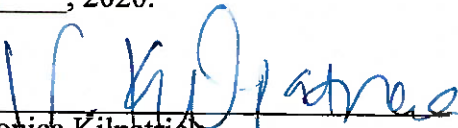
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1           WHEREFORE, Complainant prays that a hearing be conducted on the allegations  
2 of this Accusation and that upon proof thereof, a decision be rendered imposing disciplinary  
3 action against the licenses and license rights of Respondent JAMES FORREST GRANT under  
4 the Real Estate Law (Part 1 of vision 4 of the Business and Professions Code), for the cost of  
5 investigation and enforcement as permitted by law, and for such other and further relief as may  
6 be proper under other provisions of law, and for costs of audit.

7 Dated at San Diego, California

8 this 09 day of September, 2020.

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10   
11 Veronica Kilpatrick  
Supervising Special Investigator

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17 cc: JAMES FORREST GRANT  
18 Enforcement – G. Yee, V. Kilpatrick  
19 Audits – A. Wijaya, J. Lin  
Sacto.