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FILED

SEP 14 2020

DEPT. OF REAL ESTATE
By 

9 BEFORE THE DEPARTMENT OF REAL ESTATE
10 STATE OF CALIFORNIA

11 * * *

12 In the Matter of the Accusation of) No. H-41779 LA
13)
14 SUCCESS FUNDING INC,) A C C U S A T I O N
15 doing business as Pride Funding,)
16 Pride Management Group, Pride)
17 Real Estate, Pride Realty, and)
18 Success Marketing,)
19 HAKOBYAN MINASYAN, INC., and)
20 ALEX ASHOD DADOURIAN,)
21 individually and as designated officer of)
22 Hakobyan Minasyan, Inc. and)
23 former designated officer of)
24 Success Funding Inc,)
25 Respondents.)
26)
27)

22 The Complainant, Chika Sunquist, a Supervising Special Investigator of the
23 State of California, for cause of Accusation against SUCCESS FUNDING INC, doing business
24 as Pride Funding, Pride Management Group, Pride Real Estate, Pride Realty, and Success
25 Marketing, HAKOBYAN MINASYAN, INC., and ALEX ASHOD DADOURIAN,
26 individually and as designated officer of Hakobyan Minasyan, Inc. and former designated
27 officer of Success Funding Inc, ("Respondents"), is informed and alleges as follows:

Accusation of Success Funding Inc, Alex Ashod Dadourian, and Hakobyan Minasyan, Inc.

1.

The Complainant, Chika Sunquist, acting in her official capacity as a Supervising Special Investigator of the State of California, makes this Accusation against SUCCESS FUNDING INC, HAKOBYAN MINASYAN, INC., and ALEX ASHOD DADOURIAN.

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 SUCCESS FUNDING INC ("SUCCESS FUNDING") was licensed and/or had license rights issued by the Department of Real Estate ("Department") as a corporate real estate broker. SUCCESS FUNDING also has a company mortgage loan originator license endorsement.

4.

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

5.

From November 13, 2014, through May 22, 2020, Respondent SUCCESS FUNDING was licensed by the Department as a corporate real estate broker by and through DADOURIAN, 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 SUCCESS FUNDING, or by SUCCESS FUNDING'S officers, agents and employees.

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Accusation of Success Funding Inc, Alex Ashod Dadourian, and Hakobyan Minasyan, Inc.

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6.

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

7.

Respondent HAKOBYAN MINASYAN is licensed by the Department as a corporate real estate broker by and through DADOURIAN, 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 HAKOBYAN MINASYAN, or by HAKOBYAN MINASYAN'S officers, agents and employees.

MAIN OFFICE ADDRESS

8.

From July 17, 2015, through May 21, 2020, the main office address maintained by Respondent SUCCESS FUNDING with the Department was 8949 Reseda Bl # 216, Northridge, CA 91324.

9.

From May 19, 2020, to the present, the main office address maintained by Respondent DADOURIAN with the Department is 8949 Reseda Blvd Ste 218, Northridge, CA 91324-6503. From July 7, 2015, through May 18, 2020, the main office address maintained by DADOURIAN with the Department was 8949 Reseda Blvd Ste 216, Northridge, CA 91324.

10.

From April 9, 2020, to the present, the main office address maintained by Respondent HAKOBYAN MINASYAN with the Department is 8949 Reseda Blvd Ste 218, Northridge, CA 91324.

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BROKERAGE
SUCCESS FUNDING INC

11.

At all times mentioned, in the City of Los Angeles, County of Los Angeles, Respondent SUCCESS FUNDING acted as a real estate broker, conducting licensed activities within the meaning of Code section 10131(d) (solicits borrowers or lenders for or negotiates loans or collects payments or performs services for borrowers or lenders or note owners in connection with loans secured by real property).

MORTGAGE FRAUD

Corona house mortgage

12.

On or about August 3, 2017, buyers S. Labeeb and K. Salib submitted an offer to purchase real property at 13220 Broken Bit Circle, Corona, CA 92883 ("Corona house") through a signed Residential Purchase Agreement.

13.

On or about August 24, 2017, S. Labeeb and K. Salib signed Uniform Residential Loan Applications for the purchase of the Corona house. The Uniform Residential Loan Applications were completed to say that S. Labeeb was employed by In The Arms of Grace Hospice, Inc and K. Salib was employed by Victor's Electronic Repairs. However, S. Labeeb was not employed by In The Arms of Grace Hospice, Inc and K. Salib was not employed by Victor's Electronic Repairs. Respondents SUCCESS FUNDING and DADOURIAN signed the Uniform Residential Loan Applications as the mortgage broker.

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14.

On or about August 24, 2017, Respondents SUCCESS FUNDING and DADOURIAN created fake pay stubs that indicated S. Labeeb was employed and compensated by In The Arms of Grace Hospice, Inc. SUCCESS FUNDING and DADOURIAN created fake pay stubs that indicated K. Salib was employed and compensated by Victor's Electronic Repairs. SUCCESS FUNDING and DADOURIAN submitted the fake pay stubs to the lender.

15.

On or about August 30, 2017, Respondents SUCCESS FUNDING and DADOURIAN forged the signature on the Request for Verification of Employment for S. Labeeb and In The Arms of Grace Hospice, Inc. SUCCESS FUNDING and DADOURIAN forged the signature on the Request for Verification of Employment for K. Salib and Victor's Electronic Repairs. SUCCESS FUNDING and DADOURIAN submitted the forged Request for Verification of Employment to the lender.

16.

On or about September 16, 2017, the purchase of the Corona house closed.

17.

On or about September 19, 2017, the settlement agent disbursed the funds for the purchase of the Corona house.

Palm Springs house mortgage

18.

On or about July 6, 2017, buyer A. Iskanian submitted an offer to purchase real property at 372 W Dominguez Rd, Palm Springs, CA 92262 ("Palm Springs house") through a signed Residential Purchase Agreement.

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19.

On or about September 6, 2017, A. Iskanian signed a Uniform Residential Loan Application for the purchase of the Palm Springs house. The Uniform Residential Loan Application was completed to say that A. Iskanian was employed by Trianda Inc. However, A. Iskanian was not employed by Trianda Inc. Respondents SUCCESS FUNDING and DADOURIAN signed the Uniform Residential Loan Application as the mortgage broker.

20.

On or about September 6, 2017, Respondents SUCCESS FUNDING and DADOURIAN created fake pay stubs that indicated A. Iskanian was employed and compensated by Trianda Inc. SUCCESS FUNDING and DADOURIAN submitted the fake pay stubs to the lender.

21.

On or about September 25, 2017, the purchase of the Palm Springs house closed.

22.

On or about September 25, 2017, the settlement agent disbursed the funds for the purchase of the Palm Springs house.

Murrieta house mortgage

23.

On or about October 23, 2017, buyers G. Saad and R. Karout submitted an offer to purchase real property at 25148 Cresthaven Street #1, Murrieta, CA 92562 ("Murrieta house") through a signed Residential Purchase Agreement.

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24.

On or about November 14, 2017, G. Saad and R. Karout signed a Uniform Residential Loan Application for the purchase of the Murrieta house. The Uniform Residential Loan Application was completed to say that R. Karout was employed by In The Arms of Grace Hospice, Inc. However, R. Karout was not employed by In The Arms of Grace Hospice, Inc. Respondents SUCCESS FUNDING and DADOURIAN signed the Uniform Residential Loan Applications as the mortgage broker.

25.

On or about November 14, 2017, Respondents SUCCESS FUNDING and DADOURIAN created fake pay stubs that indicated R. Karout was employed and compensated by In The Arms of Grace Hospice, Inc. SUCCESS FUNDING and DADOURIAN submitted the fake pay stubs to the lender.

26.

On or about December 12, 2017, Respondents SUCCESS FUNDING and DADOURIAN forged the signature on the Verbal Verification of Employment for R. Karout and In The Arms of Grace Hospice, Inc. SUCCESS FUNDING and DADOURIAN submitted the forged Verbal Verification of Employment to the lender.

27.

On or about December 13, 2017, the purchase of the Murrieta house closed.

28.

On or about December 14, 2017, the settlement agent disbursed the funds for the purchase of the Murrieta house.

INVESTIGATION OF MAIN OFFICE ADDRESS

29.

A May 11, 2020, investigation revealed that Respondents SUCCESS FUNDING and DADOURIAN failed to maintain an office at 8949 Reseda Bl # 216, Northridge, CA 91324.

Accusation of Success Funding Inc, Alex Ashod Dadourian, and Hakobyan Minasyan, Inc.

1 30.

2 A September 10, 2020, investigation revealed that Respondents DADOURIAN
3 and HAKOBYAN MINASYAN failed to maintain an office at 8949 Reseda Blvd Ste 218,
4 Northridge, CA 91324.

5 FIRST CAUSE OF ACTION

6 FRAUD AND DISHONEST DEALING

7 31.

8 The conduct, acts, or omissions of Respondents SUCCESS FUNDING and
9 DADOURIAN, as described in Paragraphs 11 through 28 above, constitute cause under Code
10 sections 10166.051(a), 10176(a), 10176(c), 10176(i), 10177(d), 10177(g), and/or 10177(j) for
11 the suspension or revocation of all the licenses, license endorsements, and license rights of
12 SUCCESS FUNDING and DADOURIAN.

13 SECOND CAUSE OF ACTION

14 FAILURE TO INFORM COMMISSIONER OF NEW ADDRESS

15 32.

16 The conduct, acts, or omissions of Respondents SUCCESS FUNDING,
17 DADOURIAN, and HAKOBYAN MINASYAN, as described in Paragraphs 8 through 10 and
18 29 through 30 above, of failing to inform to the Real Estate Commissioner of a changed main
19 office address no later than the next business day following the change is in violation Code
20 section 10162 and Regulations section 2715 and constitute cause under Code sections 10165,
21 10177(d), and/or 10177(g) for the suspension or revocation of all the licenses, license
22 endorsements, and license rights of SUCCESS FUNDING, DADOURIAN, and HAKOBYAN
23 MINASYAN.

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1 THIRD CAUSE OF ACTION

2 FAILURE TO SUPERVISE

3 33.

4 The conduct, acts, or omissions of Respondent DADOURIAN, as described in
5 Paragraphs 8 through 30 above, in failing to ensure compliance of the Real Estate Law by
6 Respondents SUCCESS FUNDING and HAKOBYAN MINASYAN, are in violation of Code
7 section 10159.2 and Regulations section 2725 and constitute cause under Code sections
8 10177(d), 10177(g), and/or 10177(h) for the suspension or revocation of all the licenses, license
9 endorsements, and license rights of DADOURIAN.

10 34.

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

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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 SUCCESS FUNDING INC, HAKOBYAN MINASYAN, INC., and ALEX
5 ASHOD DADOURIAN under the Real Estate Law, for the cost of investigation and
6 enforcement as permitted by law, and for such other and further relief as may be proper under
7 other applicable provisions of law.

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9 Dated at Sacramento, California

10 this 10th day of September, 2020

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13 
14 Chika Sunquist
Supervising Special Investigator

15
16 cc: SUCCESS FUNDING INC
17 HAKOBYAN MINASYAN, INC.
18 ALEX ASHOD DADOURIAN
Chika Sunquist
Sacto.