


1 STEVE CHU, Counsel (SBN 238155)
2 Department of Real Estate
3 320 West 4th Street, Suite 350
4 Los Angeles, California 90013-1105
5 Telephone: (213) 620-6430
6 Fax: (213) 576-6917

FILED

OCT 18 2021

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,) FIRST AMENDED
15 doing business as Pride Funding,) ACCUSATION
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.)

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1 5.

2 From November 13, 2014, through May 22, 2020, Respondent SUCCESS
3 FUNDING was licensed by the Department as a corporate real estate broker by and through
4 DADOURIAN, as the designated officer and broker responsible, pursuant to Code
5 section 10159.2, for supervising the activities requiring a real estate license conducted on behalf
6 of SUCCESS FUNDING, or by SUCCESS FUNDING'S officers, agents and employees.

7 6.

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

12 7.

13 Respondent HAKOBYAN MINASYAN is licensed by the Department as a
14 corporate real estate broker by and through DADOURIAN, as the designated officer and broker
15 responsible, pursuant to Code section 10159.2, for supervising the activities requiring a real
16 estate license conducted on behalf of HAKOBYAN MINASYAN, or by HAKOBYAN
17 MINASYAN'S officers, agents and employees.

18 MAIN OFFICE ADDRESS

19 8.

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

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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.

**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.

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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.

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.

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1 Palm Springs house mortgage

2 18.

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

6 19.

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

12 20.

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

17 21.

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

19 22.

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

22 Murrieta house mortgage

23 23.

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

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1 24.

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

8 25.

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

13 26.

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

18 27.

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

20 28.

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

23 INVESTIGATION OF MAIN OFFICE ADDRESS

24 29.

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

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30.

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

31.

A September 10, 2020, investigation revealed that Respondent SUCCESS FUNDING failed to maintain an office at 8949 Reseda Bl # 216, Northridge, CA 91324.

REQUEST FOR RECORDS

32.

On or about September 10, 2020, a Department Special Investigator served Respondents DADOURIAN and HAKOBYAN MINASYAN with a subpoena for the production of books and records related to the licensed real estate activities conducted by DADOURIAN and HAKOBYAN MINASYAN. DADOURIAN and HAKOBYAN MINASYAN failed to retain and make available for examination, copying, and inspection the books, accounts, and records related to DADOURIAN'S and HAKOBYAN MINASYAN'S licensed real estate activities.

FIRST CAUSE OF ACTION

FRAUD AND DISHONEST DEALING

33.

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

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1 FOURTH CAUSE OF ACTION

2 FAILURE TO SUPERVISE

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4 The conduct, acts, or omissions of Respondent DADOURIAN, as described in
5 Paragraphs 8 through 32 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
8 sections 10177(d), 10177(g), and/or 10177(h) for the suspension or revocation of all the
9 licenses, license endorsements, and license rights of DADOURIAN.

10 37.

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 15th day of October, 2021

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13 _____
14 Ruth Corral
15 Supervising Special Investigator

16 cc: **SUCCESS FUNDING INC**
17 **HAKOBYAN MINASYAN, INC.**
18 **ALEX ASHOD DADOURIAN**
19 **Ruth Corral**
20 **Sacto.**