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**FILED**

**FEB 08 2022**

**DEPT. OF REAL ESTATE**

By John Aguilera

8 BEFORE THE DEPARTMENT OF REAL ESTATE  
9 STATE OF CALIFORNIA

10 \* \* \*

11 In the Matter of the Accusation of ) No. H-42148 LA  
12 )  
13 S.S.D.C. MANAGEMENT, INC., ) **ACCUSATION**  
14 and )  
15 DANIELLE LATRICE THOMPSON, )  
16 individually and as designated officer )  
17 for SSDC Management, Inc., )  
18 Respondents. )

18 The Complainant, Veronica Kilpatrick, a Supervising Special Investigator for  
19 the Department of Real Estate ("Department") of the State of California, for cause of  
20 Accusation against S.S.D.C. MANAGEMENT, INC., a.k.a. "SSDC Management, Inc.," and  
21 DANIELLE LATRICE THOMPSON, individually and as a designated officer for SSDC  
22 Management, Inc. (collectively "Respondents") alleges as follows:

23 1.

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

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2.

All references to the "Code" are to the California Business and Professions Code, all references to the "Real Estate Law" are to Part 1 of Division 4 of the Code, and all references to "Regulations" are to the Regulations of the Real Estate Commissioner, Title 10, Chapter 6, California Code of Regulations.

3.

Respondents are presently licensed and/or have license rights under the Real Estate Law (Part 1 of Division 4 of the Code). Respondents have renewal rights pursuant to Code section 10201. The Department retains jurisdiction pursuant to Code section 10103.

#### LICENSE HISTORY

4.

a. Respondent S.S.D.C. Management, Inc., formerly known as S.S.D.C. Management, LLC (California Secretary of State entity/file number 200706410067, registered on March 1, 2017), was converted to S.S.D.C. Management, Inc. (California Secretary of State entity/file number C3300438) on May 25, 2010.

b. On December 15, 2010, the Department issued a real estate corporation license (license ID no. 01890746) to Respondent S.S.D.C. MANAGEMENT, INC. ("SSDCMI"), which is set to expire on December 14, 2022, unless renewed.

5.

On November 3, 2004, the Department issued a real estate broker license (license ID no. 01198191) to Respondent DANIELLE LATRICE THOMPSON ("THOMPSON"), which is set to expire on November 2, 2024, unless renewed.

6.

From December 15, 2010 through present, Respondent SSDCMI was licensed as a real estate corporation, by and through Respondent THOMPSON as designated officer-broker for Respondent SSDCMI to qualify said corporation and to act for said corporation as a real estate broker.

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From December 15, 2010 through present, Respondent THOMPSON was licensed as the designated officer ("D.O.") for Respondent SSDCMI, pursuant to Code section 10211. As Respondent SSDCMI's D.O., Respondent THOMPSON was, at all times mentioned herein, responsible for the supervision of the activities of the officers, agent, real estate licensees, and employees of Respondent THOMPSON for which a license is required, pursuant to Code section 10159.2.

8.

a. Trina Marie Stone ("Stone") is a licensed real estate salesperson (license ID no. 01756324). Stone was/is an officer, director, or had/has an ownership interest in Respondent SSDCMI.

b. Chris Lashon Evans ("Evans") is a licensed real estate salesperson (license ID no. 02064309). Evans was/is an officer, director, or had/has an ownership interest in Respondent SSDCMI.

c. Stacey Johnson ("Johnson") is a non-licensee who is the Chief Executive Officer ("CEO") of Respondent SSDCMI as of May 25, 2010.

d. Michael Smith ("Smith") is a non-licensee who is the Secretary of Respondent SSDCMI as of May 25, 2010.

e. Elixandria Hines ("Hines") is a non-licensee who was the Chief Financial Officer ("CFO") of Respondent SSDCMI as of May 25, 2010 and is the CFO/Director of Respondent SSDCMI as of March 5, 2018.

#### BROKER ACTIVITIES

9.

At all times relevant herein Respondents were engaged in the business of, acted in the capacity of, advertised or assumed to act as a real estate broker, within the meaning of section 10131(b) of the Code. Respondents' activities included performing the rental and collection of rents for real property on behalf of others for compensation or in expectation of compensation.

**CAUSE FOR ACCUSATION**

**(AUDIT LA200036)**

**10.**

On or about July 30, 2021, the Department completed an audit examination of the books and records of Respondent SSDCMI's property management activities, which require a real estate license pursuant to Code section 10131(b). The audit examination covered the period of time from September 1, 2017 through August 31, 2020. The primary purpose of the examination was to determine whether Respondent SSDCMI conducted its real estate activities in accordance with the Real Estate Law and the Commissioner's Regulations. The audit examination revealed numerous violations of the Code and the Regulations as set forth in the following paragraphs, and more fully discussed in Audit Report No. LA 200036 and the exhibits and work papers attached to said audit report.

**11.**

On October 9, 2020, the Department's auditor held an entrance conference via telephone call with Respondent THOMPSON and her attorney, Frank Buda. The Department requested SSDCMI's property management records. Respondent SSDCMI provided incomplete, limited records to the Department for the audit examination.

**12.**

According to the auditor's discussions with Respondent THOMPSON during the entrance interview and the documents examined, Respondent SSDCMI only performed property management activities. Respondent SSDCMI managed approximately twenty-nine (29) properties for twenty-seven (27) owners during the audit period and collected trust funds of approximately \$288,830.00 annually. Respondent SSDCMI charged management fees of either flat fees ranging from \$75 to \$250 or percentage fees ranging from 5% to 7% of collected rents on a monthly basis. Respondent SSDCMI also charged leasing commission of either flat fees ranging from \$500 to \$750 or percentage fees ranging from 4% to 5% of gross lease or 50% of the first month's full rent.

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**13.**

**ACCUSATION OF SSDC MANAGEMENT, INC. AND DANIELLE LATRICE THOMPSON**

At all times mentioned herein, and in connection with the property management activities described in Paragraph 12, above, Respondent SSDCMI accepted or received funds, including funds in trust ("trust funds") from or on behalf of owners of the real property managed by Respondent SSDCMI, and thereafter made deposits and/or disbursements of such funds. In her October 9, 2020 entrance interview and the Department's Form RE4950 "List of Bank Account" submitted through her October 15, 2020 email, Respondent THOMPSON stated that Respondent SSDCMI maintained one (1) active multiple beneficiary account and five (5) inactive bank accounts, for a total of six (6) bank accounts at Wells Fargo Bank, for handling trust funds received and disbursed related to Respondent SSDCMI's property management activities during the audit period.

**14.**

On November 6, 2020, a subpoena duces tecum was served on Respondent THOMPSON to produce the books and records related to the property management activities of Respondent SSDCMI. On November 6, 2020, a subpoena duces tecum was served on Wells Fargo Bank to produce the bank records related to the property management activities conducted by Respondent SSDCMI.

15.

On November 25, 2020, Respondent THOMPSON submitted a revised Department Form RE4950, stating that Respondent SSDCMI maintained one (1) active multiple beneficiary account and twenty-one (21) bank accounts, for a total of twenty-two (22) bank accounts, maintained by Respondent SSDCMI related to its property management activities. The twenty-one (21) bank accounts comprised of five (5) multiple beneficiary bank accounts and sixteen (16) single beneficiary accounts.

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III

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16.

1 According to Respondent THOMPSON, the following four (4) bank accounts at  
2 Wells Fargo Bank were used for the handling of trust fund receipts and disbursements for  
3 Respondent SSDCMI's property management during the audit period:

4 Bank Account ("B/A 1")

5 Bank: Wells Fargo Bank  
6 Account Name: SSDC Management LLC (per bank signature card)  
7 SSDC Management LLC Lezo Checking Account (per bank statement)  
8 Account Number: xxxxxx8772  
9 Signatories: Trina M. Stone

10 No. of signatures required: One (1)

11 Account status: Closed on October 19, 2020

12 Description: During the audit period, B/A 1 was used for the handling of trust fund  
13 receipts and disbursements for single beneficiary related to property  
14 management activities for property located at 1003 Keniston Ave., Los  
15 Angeles, CA 90019 ("Keniston Property"). Keniston Property is no  
16 longer managed by Respondent SSDCMI as of February 28, 2020.

17 Notes: B/A 1 was closed on October 19, 2020. B/A 1's bank statement balance  
18 of \$10,737.55 as of October 19, 2020 was transferred to a different bank  
19 account of Respondent SSDCMI (description: "Online Transfer to  
20 S.S.D.C. Management, Inc. Ref #1b0938Nvbh Business Checking  
21 Transfer to Spruce Tower East Trust Acct"). Records for this other  
22 account were not made available. After the said transfer, B/A 1 had a  
23 balance of zero as of October 19, 2020.

24 Bank Account ("B/A 2")

25 Bank: Wells Fargo Bank  
26 Account Name: SSDC Management LLC (per bank signature card)  
27 SSDC Management LLC Ref Dena Dorsey (per bank statement)



1 Account Number: xxxxxx1638  
2 Signatories: Trina M. Stone  
3 Elixandria Hines  
4 No. of signatures required: One (1)  
5 Account status: Closed on October 19, 2020  
6 Description: During the audit period, B/A 2 was used for the handling of trust fund  
7 receipts and disbursements for single beneficiary related to property  
8 management activities for property located at 658 E. 52<sup>nd</sup> St., Los  
9 Angeles, CA 90011 ("52<sup>nd</sup> Street Property").  
10 Notes: B/A 2 was closed on October 19, 2020. B/A 2's bank statement balance  
11 of \$372.68 as of October 15, 2020 was transferred to a different bank  
12 account of Respondent SSDCMI (description: "Online Transfer to  
13 S.S.D.C. Management, Inc. Ref #1b092M292N Business Checking  
14 Ibarra"). Records for this other account were not made available. After  
15 the said transfer, B/A 2 had a balance of zero as of October 19, 2020.

16 Bank Account ("B/A 3")

17 Bank: Wells Fargo Bank  
18 Account Name: SSDC Management LLC (per bank signature card)  
19 SSDC Management LLC Ref: Loma Drive (per bank statement)  
20 Account Number: xxxxxx7252  
21 Signatories: Trina M. Stone  
22 Elixandria Hines  
23 No. of signatures required: One (1)  
24 Account status: Closed on October 19, 2020  
25 Description: During the audit period, B/A 3 was used for the handling of trust fund  
26 receipts and disbursements for single beneficiary related to property  
27

1		management activities for property located at 11911 Palms Blvd., Los
2		Angeles, CA 90066 ("Palms Property").
3	Notes:	B/A 3 was closed on October 19, 2020. B/A 3's bank statement balance
4		of \$187.78 as of October 15, 2020 was transferred to a different bank
5		account of Respondent SSDCMI (description: "Online Transfer to
6		S.S.D.C. Management, Inc. Ref #1b092M2Xr2 Business Checking
7		Nagashima"). Records for this other account were not made available.
8		After the said transfer, an interest of \$0.01 that was deposited into B/A 3
9		was withdrawn, and B/A 3 had a balance of zero as of October 19, 2020.
10		<u>Bank Account ("B/A 4")</u>
11	Bank:	Wells Fargo Bank
12	Account Name:	SSDC Management LLC Pascal Account (per bank statement for
13		October 2020; after the audit date)
14	Account Number:	xxxxxx5788
15	Signatories:	Unknown
16	No. of signatures required:	Unknown
17	Account status:	Closed on October 19, 2020
18	Description:	During the audit period, B/A 4 was used for the handling of trust fund
19		receipts and disbursements for multiple beneficiaries related to property
20		management activities for properties located at 3158 W. 168 <sup>th</sup> Street,
21		Torrance, CA 90504 ("168 <sup>th</sup> Street Property") and 1115 S. Elam Dr.
22		#403, Los Angeles, CA 90025 ("Elm Property"). Elm Property is no
23		longer managed by Respondent SSDCMI as of January 1, 2020.
24	Notes:	Respondent THOMPSON failed to provide, upon request, B/A 4 bank
25		signature card and complete bank statements for the audit period and
26		only provided the bank statement for October 2020, which is after the
27		audit period. Bank records for B/A 4 were not subpoenaed from Wells



1 Fargo Bank, because B/A 4 information was provided by Respondent  
2 THOMPSON on November 25, 2020, which was after the subpoena was  
3 served by the Department on November 6, 2020. B/A 4 was closed on  
4 October 19, 2020. B/A 4's bank statement balance of \$168.82 as of  
5 October 19, 2020 was withdrawn ("Withdrawal Made In A  
6 Branch/Store"), and B/A 4 had a balance of zero as of October 19, 2020.

7 Violations of the Real Estate Law

8 17.

9 The audit examination revealed violations of the Code and the Regulations, as  
10 set forth in the following paragraphs, and more fully discussed in Audit Report No. LA200036  
11 and the exhibits and work papers attached to the audit report.

12 18.

13 Issue 1. Trust Fund Accountability and Balances (Code section 10145 and  
14 Regulation 2832.1). According to the limited bank records and documents provided by  
15 Respondent THOMPSON and subpoenaed B/A 1 bank records from Wells Fargo Bank,  
16 including the bank statements for all trust funds received and disbursed, the Department's  
17 auditor prepared bank reconciliation for B/A 1 with a cut-off date of February 29, 2020 and for  
18 B/A 2 and B/A 3 with a cut-off date of August 31, 2020. A bank reconciliation for B/A 4 with  
19 a cut-off date of August 31, 2020 was not performed, due to records not provided. The  
20 adjusted bank balance was compared to total balance of the Wells Fargo Bank Account  
21 Worksheet (minimum trust fund accountability) for B/A 1, B/A 2, and B/A 3.

22 (a) B/A 1 with cut-off date of February 29, 2020. As of February 29, 2020,  
23 there was a minimum trust fund shortage of <\$26,282.12> in B/A 1. Respondent THOMPSON  
24 was the D.O. for Respondent SSDCMI during the audit period from September 1, 2017 through  
25 August 31, 2020. Respondents failed to provide any evidence that the owners of the trust funds  
26 had given their written consent to allow Respondent SSDCMI to reduce the balances of the  
27 funds in B/A 1 to an amount less than the existing trust fund liabilities, in violation of Code

1 section 10145(a) and Regulation 2832.1.

2 (b) B/A 2 with a cut-off date of August 31, 2020. As of August 31, 2020, there  
3 was a minimum trust fund shortage of <\$485.68> in B/A 2. Respondent THOMPSON was the  
4 D.O. for Respondent SSDCMI during the audit period from September 1, 2017 through August  
5 31, 2020. Respondents failed to provide any evidence that the owners of the trust funds had  
6 given their written consent to allow Respondent SSDCMI to reduce the balances of the funds in  
7 B/A 2 to an amount less than the existing trust fund liabilities, in violation of Code section  
8 10145(a) and Regulation 2832.1.

9 (c) B/A 3 with a cut-off date of August 31, 2020. As of August 31, 2020, there  
10 was a minimum trust fund shortage of <\$129.07> in B/A 3. Respondent THOMPSON was the  
11 D.O. for Respondent SSDCMI during the audit period from September 1, 2017 through August  
12 31, 2020. Respondents failed to provide any evidence that the owners of the trust funds had  
13 given their written consent to allow Respondent SSDCMI to reduce the balances of the funds in  
14 B/A 3 to an amount less than the existing trust fund liabilities, in violation of Code section  
15 10145 and Regulation 2832.1.

16 Issue 2. Handling of Trust Funds (Code section 10145 and Regulation  
17 2832).

18 (a) B/A 1, B/A 2, B/A 3. According to the bank signature cards subpoenaed  
19 from Wells Fargo Bank, B/A 1, B/A 2, and B/A 3, which were used for handling trust funds  
20 received and disbursed on behalf of the property owners during the audit period, were not  
21 designated as trust accounts and were set up in the name of "SSDC Management LLC" and not  
22 in the name of SSDC Management, Inc. as trustee, in violation of Code section 10145 and  
23 Regulation 2832.

24 (b) B/A 4. Respondent SSDCMI failed to make available the bank records for  
25 B/A 4 used for handling trust funds received and disbursed in connection with Respondent  
26 SSDCMI's property management activities during the audit period. Respondent failed to make  
27 B/A 4's signature card available for the audit. According to the October 2020 statement for

B/A 4 provided by Respondent THOMPSON, B/A 4, which was a trust account, was set up in the name "SSDC Management LLC Pascal Account," and not in the name of SSDC Management, Inc. as trustee, in violation of Code Section 10145 and Regulation 2832.

**Issue 3. Trust Fund Records to be Maintained (Code section 10145 and Regulation 2831).** During the audit period, Respondent SSDCMI failed to maintain a complete and accurate records of all trust funds received and disbursed (control records) for the properties examined. Further, Respondent SSDCMI failed to maintain a complete and accurate record of all trust funds received and disbursed for B/A 1, B/A 2, and B/A 3, in violation of Code section 10145 and Regulation 2381. Based on the control records of the Keniston Property, 52<sup>nd</sup> Property, and Palms Property, some of the rents received were deposited to a different bank account not provided by Respondent SSDCMI, according to findings that: (a) there were deposits and disbursements that were not found in the bank statements of B/A 1, B/A 2, and B/A 3; (b) there were dates of deposits and disbursement that did not match the bank statements of B/A 1, B/A 2, and B/A 3; (c) payments labeled as checks were online transfers based on the statements of B/A 1, B/A 2, and B/A 3; and (d) there were transactions that were not found in the bank statements of B/A 1, B/A 2, and B/A 3. Some examples of these findings include, but are not limited to:

<u>per control recs</u>	<u>Amount</u>	<u>per bank statement</u>	<u>Property</u>	<u>Disposition of Funds</u>
09/16/2019	\$ 2,000.00	Not in B/A 1	Keniston	Unknown
06/24/2019	\$ 1,405.00	Not in B/A 2	52 <sup>nd</sup> Street	Unknown
08/30/2019	\$ 1,500.00	Not in B/A 3	Palms	Unknown
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1	Date Paid	Deposit	Date Paid	Disbursed
2	<u>per control recs</u>	<u>Amount</u>	<u>per bank statement</u>	<u>Property from Account</u>
3	03/23/2020	\$24,917.43	Not in B/A 1	Keniston Unknown
4	09/10/2019	\$ 2,600.00	Not in B/A 2	52 <sup>nd</sup> Street Unknown
5	12/11/2019	\$ 3,845.00	Not in B/A 3	Palms Unknown
6	06/01/2020	\$ 150.00	08/17/2020	Palms B/A 3

8	Date Paid	Payment method	Date Paid	Payment	Disbursed
9	<u>per control recs</u>	<u>per control recs</u>	<u>per bank stmt</u>	<u>per bank stmt</u>	<u>Property from account</u>
10	10/31/2019	Check no. 12830	10/31/2019	Online transfer	Keniston B/A 1
11	11/29/2019	Check no. 12732	12/02/2019	Online transfer	Keniston B/A 1
12	03/31/2020	Check no. 12408	03/31/2020	Online transfer	52 <sup>nd</sup> Street B/A 2
13	08/11/2020	Check no. 12939	08/11/2020	Online transfer	Palms B/A 3

15	Deposit Date	Deposit	Transfer Date	Disposition
16	<u>per control recs</u>	<u>Amount</u>	<u>per bank statement</u>	<u>Property of Funds</u>
17	10/22/2019	\$2,000.00	10/31/2019	Keniston B/A 1
18	07/09/2020	\$ 395.00	08/28/2020	52 <sup>nd</sup> Street B/A 2
19	01/06/2020	\$3,695.00	01/15/2020	Palms B/A 3

21	Deposit Date	Deposit	Disposition
22	<u>per bank stmt</u>	<u>Amount</u>	<u>Property of Funds</u>
23	05/05/2020	\$1,600.00	Not in control recs 52 <sup>nd</sup> Street B/A 2
24	01/31/2020	\$ 5.00	Not in control recs Keniston B/A 1
25	02/24/2020	\$ 350.00	Not in control recs Palms B/A 3

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1                   **Issue 4. Trust Account Reconciliation (Code section 10145 and Regulation**  
2 **2831.2).** During the audit period, Respondent SSDCMI failed to perform and maintain an  
3 accurate monthly reconciliation comparing the balance of all the separate beneficiary or  
4 transaction records (separate records) to the balance of all trust funds received and disbursed  
5 (control record) for B/A 4, in violation of Code section 10145 and Regulation 2831.2.

6                   **Issue 5. Fictitious Name / Use of False or Fictitious Name (Code section**  
7 **10159.5 and Regulation 2731).** During the audit period, Respondent SSDCMI used the  
8 unauthorized, unlicensed fictitious business name "SSDC Management LLC" and  
9 "www.ssdcmangement.com," in violation of Code section 10159.5 and Regulation 2731.

10                   **Issue 6. Salesman Employment and Termination / Notice of Change of**  
11 **Broker (Code section 10161.8(b) and Regulation 2752).** During the audit period,  
12 Respondent SSDCMI failed to notify the Commissioner for the Department within five (5)  
13 days of the employment for at least two (2) salespersons: Trina Marie Stone and Chris Lashon  
14 Evans, in violation of Code 10161.8(b) and Regulation 2752.

15                   **Issue 7. Broker-Salesman Relationship Agreements (Regulation 2726).**  
16 During the audit period, Respondent SSDCMI failed to maintain broker-salesperson  
17 relationship agreements with at least two (2) salespersons: Trina Marie Stone and Chris Lashon  
18 Evans, in violation of Regulation 2726.

19                   **Issue 8. Retention of Records (Code section 10148).** Respondent SSDCMI  
20 failed to produce some of the requested books, accounts, and records related to the property  
21 management activities for the audit examination for the audit period of September 1, 2017  
22 through August 31, 2020. The Department served Respondent THOMPSON with a subpoena  
23 duces tecum on November 6, 2020 to produce the books and records related to the property  
24 management activities conducted by Respondent SSDCMI. Respondents failed to make all of  
25 the books and records available for examination, inspection, or copying, and instead produced a  
26 revised DRE Form RE4950 and a list of properties managed with the corresponding bank  
27 accounts.



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1 20.

2 Based on the audit violations noted above in Paragraph 18, Respondent  
3 THOMPSON failed to adequately supervise the activities of Respondent SSDCMI's  
4 salespersons, employees, or agents and failed to establish policies, rules, procedures, and  
5 systems to review, oversee, inspect, and manage transactions requiring a real estate license and  
6 the handling of trust funds to ensure compliance with the Real Estate Law and Regulations, in  
7 violation of Regulation 2725, which constitutes cause to suspend or revoke the real estate  
8 licenses and license rights of Respondent THOMPSON pursuant to Code sections 10159.2,  
9 10177(d), (g), and/or (h), and Regulation 2725.

10 (COSTS)

11 21.

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

17 22.

18 Section 10106 of the Code, provides, in pertinent part, that in any order issued  
19 in resolution of a disciplinary proceeding before the Bureau, the Commissioner may request the  
20 administrative law judge to direct a licensee found to have committed a violation of this part to  
21 pay a sum not to exceed the reasonable costs of investigation and 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 and/or license rights of Respondents under the Real  
4 Estate Law, for the costs of investigation and enforcement as permitted by law, for the cost of  
5 the audit, and for such other and further relief as may be proper under other applicable  
6 provisions of law.

7  
8 Dated at San Diego, California this 7 day of February, 2021

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11 *Veronica Kilpatrick*

12 Veronica Kilpatrick  
13 Supervising Special Investigator  
14  
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18 cc: S.S.D.C. MANAGEMENT, INC.  
19 DANIELLE LATRICE THOMPSON  
20 Veronica Kilpatrick  
21 Sacto.  
22 Audits – Anitha Wijaya  
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