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DEPT. OF REAL ESTATE

By- [REDACTED]

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9 BEFORE THE DEPARTMENT OF REAL ESTATE
10 STATE OF CALIFORNIA

11 * * *

12 In the Matter of the Accusation of

No. H-42967-LA

13 YGG INVESTMENTS INC., DENIS M. HANN,
14 individually and as designated officer of YGG
Investments Inc., and GEORGE GOLOVIN,

FIRST AMENDED ACCUSATION

Respondents.

15 **This First Amended Accusation amends the Accusation filed on September 8, 2025.** The
16 Accusation filed on September 8, 2025 ("original Accusation"), is amended as follows: to allege a
17 violation of Title 10, California Code of Regulations, section 2725 in audit Issue Eleven (11), in
18 Paragraph 56, and in the First Cause of Accusation, in Paragraph 61; to allege a new Eighth Cause
19 of Accusation in Paragraphs 103 through 112 to allege violations of California Business and
20 Professions Code sections 10158, 10159, 10159.2, and 10211, and Regulation 2740; and to
21 renumber the old version of the Eighth Cause of Accusation in the original Accusation as the new
22 Ninth Cause of Accusation, and to renumber old Paragraphs 104 through 107 to new Paragraphs
23 113 through 116. No other parts of the original Accusation are affected

24 The Complainant, Ray Dagnino, a Supervising Special Investigator for the Department of Real
25 Estate ("Department" or "DRE") of the State of California, for cause of Accusation against YGG
26 INVESTMENTS INC. ("YGGII"), DENIS M. HANN ("HANN"), individually and as designated
27 officer of YGGII, and GEORGE GOLOVIN ("GOLOVIN") (collectively "Respondents"), alleges
28 as follows:

1. The Complainant, Ray Dagnino, acting in his official capacity as a Supervising Special Investigator, makes this Accusation against Respondents.

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. Respondent YGGII has been licensed by the DRE as a real estate corporation ("REC"), DRE license identification number ("License ID") 01952623.

a. According to DRE records, YGGII has been licensed from on or about April 15, 2014, to on or about April 14, 2018, from on or about August 30, 2018, to on or about August 29, 2022, and from on or about July 24, 2023, through the present, with YGGII's license scheduled to expire on July 23, 2027, unless renewed. YGGII is currently licensed through HANN's real estate broker ("REB") license, License ID 01329549, and HANN is the current designated officer ("D.O.")

b. According to DRE records, YGGII's REC license was expired from on or about August 30, 2022 to on or about July 23, 2023.

c. HANN was also previously the D.O. for YGGII from March 26, 2020, to August 29, 2022, and HANN became the D.O. for YGGII again, effective on July 24, 2023, when YGGII's license was renewed.

d. Previously, YGGII was licensed through the REB license of Lysa C. Gresalfi (“Gresalfi”), License ID 0705185, from on or about April 15, 2014, through on or about March 26, 2020, and Gresalfi was the D.O. for YGGII during that time period.

e. As of October 17, 2023, YGGII employed one (1) real estate salesperson, had no branch offices, and had no active fictitious business names (“dbas”) licensed by the DRE.

f. YGGII previously maintained the licensed dbas “Real Property Management South SFV” and “RPM South San Fernando Valley,” however, both dba licenses expired on August 30, 2022.

4. Respondent HANN has been licensed by the DRE as an REB, License ID 01329549, from on or about February 15, 2002, through the present, with HANN's license scheduled to expire

on or about February 14, 2026, unless renewed. According to DRE records to date, HANN currently has two real estate salespersons affiliated with his REB license. HANN also has a Mortgage Loan Originator ("MLO") license endorsement with the DRE with National Mortgage Licensing System and Registry ("NMLS") ID 2572313, which, as of January 9, 2025, is in Approved-Inactive status. According to DRE records to date, besides being the D.O., for YGGII, HANN is also currently the D.O. for the following RECs:

- a. Safe Harbor Realty and Property Management Inc., License ID 01527722;
- b. HWE California, Inc., License ID 02075408;
- c. Universal Commercial Capital, License ID 02080884;
- d. OutfitRealty.com, License ID 02205898; and
- e. Crown Bridge Realty Inc., License ID 02216651.

5. GOLOVIN has been licensed by the DRE as a Real Estate Salesperson ("RES"), License ID 01947558, from on or about February 7, 2014, through the present, with GOLOVIN's license scheduled to expire on or about March 6, 2026, unless renewed. According to DRE records to date, and as relevant to this case, GOLOVIN has the following real estate license history.

- a. GOLOVIN's RES license has been affiliated with the following responsible brokers during the time periods listed:

Responsible Broker	Start Date	End Date
Lysa C. Gresalfi	03/27/2014	08/06/2014
YGGII	09/13/2014	10/16/2014
YGGII	12/02/2014	03/16/2015
YGGII	05/06/2015	05/28/2015
YGGII	08/17/2016	04/14/2018
YGGII	02/25/2019	03/04/2020
HANN	03/18/2020	02/06/2022
HANN	03/08/2022	10/04/2023
YGGII	10/05/2023	N/A

- b. On or about March 5, 2020, the DRE received a Salesperson Change Application, form RE 214, for GOLOVIN through the DRE's eLicensing system, stating that

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1 GOLOVIN's employment with YGGII was discontinued. This Salesperson Change
2 Application was submitted by YGGII and was certified by Gresalfi.

3 c. On or about March 18, 2020, the DRE received another Salesperson Change
4 Application, form RE 214, for GOLOVIN through the DRE's eLicensing system, certified
5 by GOLOVIN and HANN, stating that GOLOVIN's new sponsoring broker was HANN.

6 d. On or about February 1, 2022, while GOLOVIN was licensed to HANN's
7 REB license, GOLOVIN signed a Sales Agent and Broker-Associate Employment
8 Agreement with YGGII, signed by HANN on behalf of YGGII. GOLOVIN remained
9 licensed to HANN's REB license until October 4, 2023.

10 e. On or about March 8, 2022, the DRE received a Salesperson Renewal
11 Application, form RE 209, from GOLOVIN through the DRE's eLicensing system, certified
12 by GOLOVIN and HANN, listing GOLOVIN's responsible broker as HANN.

13 f. On or about October 5, 2023, the DRE received another Salesperson Change
14 Application, form RE e214, for GOLOVIN through the DRE's eLicensing system, certified
15 by GOLOVIN and HANN, stating that GOLOVIN's new responsible broker was YGGII.

16 **BROKERAGE: YGGII**

17 6. At all times mentioned, in the County of San Diego, YGGII acted as a REC,
18 conducting licensed activities within the meaning of Code section 10131(b): leasing or renting,
19 offering to lease or rent, or collecting rents from real property for others. At all times mentioned,
20 YGGII was acting by and through HANN as its designated officer pursuant to Code section 10159.2,
21 and HANN was responsible for ensuring compliance with the Real Estate Law.

22 **FACTS DISCOVERED BY THE DRE**

23 7. On or about March 3 and 8, 2023, the DRE received complaints from J.S. and J.V.,^{1/}
24 respectively, against YGGII, alleging that YGGII was engaged in property management activities
25 without a license.

26 8. On or about March 23, 2023, a DRE special investigator accessed the website owned
27 and maintained by YGGII located at www.rpmsouthsfv.com, found that there was no disclosure of

28 ^{1/} Initials are used in place of names to protect privacy. Documents containing full names will be provided during
discovery in this case to Respondents and/or their attorney(s), after service of a proper request for discovery on the DRE.

YGGII's name and DRE License ID number on the website, and found that YGGII was advertising the following four rental listings on March 23, 2023:

1. 14408 Plummer Street #112, Panorama City, CA 91402
2. 11127 Sunshine Terrace, #1, Studio City, CA 91604
3. 2149 Brownstone Creek Avenue, Simi Valley, CA 93063
4. 11127 Sunshine Terrace #2, Studio City, CA 91604

9. On or about May 5, 2023, a DRE special investigator accessed the website owned and maintained by YGGII located at www.rpmsouthsfv.com, and found that YGGII was advertising a rental listing for: 11127 Sunshine Terrace, Unit #1 (Main House), Studio City, CA 91604.

AUDIT OF YGGII: AUDIT NO. LA230014

10. On March 29, 2024, the DRE completed an audit examination of the books and records of YGGII's real estate activities that require a real estate license under Code section 10131. The audit examination, Audit No. LA230014, covered the period from September 1, 2022, to August 31, 2023, ("audit period"). The audit was limited to YGGII's property management activities.

11. The purpose of the audit examination was to determine whether YGGII conducted its property management activities and handled and accounted for trust funds in accordance with the Real Estate Law and the Regulations.

12. YGGII's corporate structure is as follows:

<u>Name</u>	<u>Title</u>	<u>License Status</u>	<u>Shareholder %</u>
HANN	No title	D.O./REB	0%
GOLOVIN	President	RES	50%
Yuliana Golovin	Secretary	Unlicensed	50%

13. According to records examined, YGGII managed approximately sixty (60) properties for fifty-four (54) owners in the last 12 months of the audit period. In addition, based on YGGII's trust account bank statements, YGGII collected a total of approximately \$2,691,295.52 in property management trust funds in the last 12 months of the audit period. YGGII charged various management fees ranging from the greater of \$100.00 to \$125.00 or 3% to 10% of collected rents depending on the size of the properties managed.

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1 **YGGII's Bank Account for Property Management Activities**

2 14. YGGII maintained one (1) bank account for handling the receipts and disbursements
3 of trust funds in connection with its property management activity during the audit period, as follows:

4 **Trust Account 1 ("TA1")**

5 Bank:	Enterprise Bank & Trust ("EB&T")
6 Account Name:	YGG Investments Inc DBA Real Property Management South SFV, As Trustee, Master Trust
7 Account #:	XXXXXXXX4487
8 Signatories:	HANN GOLOVIN
9 Signatures required:	One (1) signature
10 Description	TA1 was used for handling trust fund receipts and disbursements 11 for multiple beneficiaries related to YGGII's property management activity during the audit period.

12 15. On or about June 1, 2020, based on records reviewed, GOLOVIN—while licensed to
13 HANN's REB license and not YGGII's REC license—opened a trust account ending in account
14 number 4487, with Seacoast Commerce Bank ("Seacoast"),^{2/} in the name of YGG Investments Inc
15 DBA Real Property Management South SFV, As Trustee, Master Trust.

16 a. On or about May 27, 2020, GOLOVIN, identified as an authorized individual,
17 authorized signer, and president and chief executive officer for YGGII on the Seacoast Bank
18 Master Signature Card ("signature card"), for the account ending in 4487, used DocuSign to
19 digitally sign the section of the signature card titled Certificate of Authority and Company
20 Resolutions, and the section of the signature card for Authorized Signers.

21 b. On or about May 27, 2020, Yuliana Golovin, identified as the corporate
22 secretary for YGGII, used DocuSign to digitally sign the section of the signature card titled
23 Certificate of Authority and Company Resolutions.

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27 ^{2/} Based on a Form 8-K filed by Enterprise Financial Services Corp. ("EFSC") with the U.S. Securities and Exchange
28 Commission, on or about November 12, 2020, Seacoast's holding company, Seacoast Commerce Banc Holdings
("SCBH"), merged with and into EFSC, the holding company of Enterprise Bank & Trust ("EB&T"), in which SCBH
merged with and into EFSC, with EFSC surviving the merger, and Seacoast merged with and into EB&T, with EB&T
surviving the merger.

1 c. On or about May 27, 2020, HANN, identified as an authorized signer, used
2 DocuSign to digitally sign the section of the signature card for Authorized Signers. authorized
3 signers for the Seacoast account ending in 4487.

4 d. After the merger of Seacoast into EB&T, YGGII's trust account, TA1,
5 continued with the same account number ending in 4487.

6 **Audit Violations in Audit No. LA230014**

7 16. The audit examination revealed violations of the Code and the Regulations, as set
8 forth in the following paragraphs, and more fully discussed in Audit No. LA230014 and the exhibits
9 and work papers attached to the audit report:

10 **Issue One (1). Code Section 10145 and Regulation 2832.1: Trust Fund Handling for Multiple**
11 **Beneficiaries**

12 17. As of August 31, 2023, there was a minimum trust fund shortage of <\$597.48> in
13 TA1. The minimum shortage of <\$597.48> could not be identified due to poor record keeping as of
14 August 31, 2023.

15 18. YGGII provided no evidence that the owners of the trust funds provided written
16 consent to allow YGGII to reduce the balance of funds in TA1 to an amount less than the existing
17 aggregate trust fund liabilities.

18 19. YGGII's reduction of the balance of funds in TA1 to an amount less than the existing
19 aggregate trust fund liabilities was in violation of **Code section 10145 and Regulation 2832.1.**

20 20. On or about February 22, 2024, YGGII cured the minimum trust fund shortage of
21 <\$597.48> in TA1 by depositing check number 1105 in the amount of \$597.48 from YGGII's
22 operating bank account ending in 4479.

23 **Issues Two (2) and Three (3).^{3/} Code Section 10130: Property Management Activities Without**
24 **Required License from August 30, 2022 to July 23, 2023**

25 21. According to DRE records to date, YGGII's REC license was expired from on or
26 about August 30, 2022 to on or about July 23, 2023. As a result of YGGII's REC license expiration,
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28 ^{3/} Issues 2 and 3 have been combined for purposes of this Accusation as they both involve violations of Code § 1030.

1 YGGII's licensed dbas, "Real Property Management South SFV" and "RPM South San Fernando
2 Valley," also expired as of August 30, 2022, and became inactive.

3 22. According to YGGII, it made multiple efforts to renew its REC license between
4 October 2022 and June 2023.

5 a. Based on DRE records, on or about November 28, 2022, the DRE received a
6 Corporation Change Application, form RE 204A, from YGGII seeking to change its mailing
7 and main office addresses and to add two dbas.

8 b. Based on DRE records, on or about November 28, 2022, the DRE also
9 received a Corporation License Application, form RE 201, from YGGII, along with check
10 number 1030 for \$450.00, which had a handwritten memo referencing "Corporation License
11 Fee" for YGGII.

12 c. On or about December 8, 2022, the DRE sent a letter to YGGII in response to
13 YGGII's Corporation Change Application, informing YGGII that the changes to REC's
14 license records could not be made because of deficiencies in the Corporation Change
15 Application, and, more importantly, the DRE informed YGGII that DRE records showed that
16 YGGII's REC/officer license expired on August 29, 2022, and had not been renewed. The
17 DRE's letter further stated, "Until the license is renewed, no other changes may be made, and
18 ALL LICENSED ACTIVITIES MUST CEASE."

19 d. On or about January 30, 2023, the DRE sent a letter to YGGII in response to
20 YGGII's Corporation License Application, informing YGGII that the application it submitted
21 to renew its officer license was the wrong form, that the DRE was returning YGGII's check
22 uncashed, and provided instructions to renew its license, enclosing the correct renewal
23 application.

24 e. Based on DRE records, on or about June 23, 2023, the DRE received an
25 Officer Renewal Application, form RE 207, from YGGII with a check for \$450.00. The DRE
26 processed this application and YGGII's REC license was renewed, effective July 24, 2023.

27 23. Based on information obtained by the DRE, during the period that YGGI's REC
28 license was expired from on or about August 30, 2022 to on or about July 23, 2023, YGGII

1 continuously performed property management activities without a valid REC license, GOLOVIN,
2 whose RES license was not affiliated with YGGII from on or about March 5, 2020, through on or
3 about October 4, 2023, signed property management agreements and lease agreements on behalf of
4 YGGII, and, during the period that GOLOVIN's GOLOVIN RES license was not affiliated with
5 YGGII, GOLOVIN was an authorized signer for TA1.

6 24. On or about October 21, 2022, GOLOVIN, on behalf of YGGII dba Real Property
7 Management South San Fernando Valley, signed a property management agreement ("PMA") with
8 B.P., the owner of the property located at 1575 Dunswell Avenue, Hacienda Heights, CA 91745
9 ("Dunswell Property").

10 25. On or about November 4, 2022, GOLOVIN, on behalf of YGGII dba Real Property
11 Management South SFV, signed a lease agreement with tenants X.L. and H.C. for lease of the
12 Dunswell Property.

13 26. On or about November 15, 2022, GOLOVIN, on behalf of YGGII dba Real Property
14 Management South SFV, signed a PMA with J.W., the owner of the property located at 11127
15 Sunshine Terrace, Studio City, CA 91604 ("Sunshine Property").

16 27. On or about March 23, 2023, YGGII advertised on its website the following properties
17 for rent, which properties were managed by YGGII:

18 a. 11127 Sunshine Terrace Unit 1, Studio City, CA 91604 ("Sunshine
19 Property");

20 b. 11127 Sunshine Terrace Unit 2, Studio City, CA 91604 ("Sunshine
21 Property");

22 c. 14408 Plummer St. #112, Panorama City, CA 91402 ("Plummer Property");
23 and

24 d. 2149 Brownstone Creek Ave., Simi Valley, CA 93063 ("Brownstone
25 Property").

26 28. On a date unknown but, on information and belief, believed to be between on or about
27 March 23, 2023, and April 1, 2023, GOLOVIN, on behalf of YGGII dba Real Property Management
28 South SFV, signed a lease agreement with tenant C.R. for lease of the Plummer Property.

1 29. On or about April 13, 2023, GOLOVIN, on behalf of YGGII dba Real Property
2 Management South SFV, signed a lease agreement with tenant C.S. for lease of the Brownstone
3 Property.

4 30. On or about May 5, 2023, YGGII advertised on its website the following property for
5 rent, which property was managed by YGGII: 11127 Sunshine Terrace, Unit 1, Studio City, CA
6 91604 ("Sunshine Property").

7 31. On or about September 1, 2023, GOLOVIN, on behalf of YGGII dba Real Property
8 Management South San Fernando Valley, signed a PMA with L.K., the owner of the Brownstone
9 Property.

10 32. From on or about August 30, 2022 to on or about July 23, 2023:

11 a. YGGII continuously solicited business for real estate activities on its website,
12 www.rpmsouthsfv.com, and also performed property management activities for
13 approximately seventy/nine (79) single family residences ("SFR").

14 b. YGGII continuously collected rents and security deposits, maintained in TA1,
15 for the Sunshine, Plummer, and Brownstone Properties, and 1575 Dunswell Avenue,
16 Hacienda Heights, CA 91745 ("Dunswell Property").

17 c. YGGII continuously collected management fees, maintained in TA1, for the
18 Sunshine, Plummer, Brownstone, and Dunswell Properties.

19 d. YGGII continuously disbursed trust funds from TA1 for the Sunshine,
20 Plummer, Brownstone, and Dunswell Properties.

21 33. YGGII's acts and/or omissions in performing real estate activities requiring a license,
22 in expectation of compensation, during the period when YGGII's license was expired, were in
23 violation of **Code section 10130**.

24 **Issue Four (4). Code Section 10145 and Regulation 2831: Trust Fund Records to be Maintained.**

25 34. The control record maintained for TA1, which was used for handling the receipts and
26 disbursements of trust funds in connection with the YGGII's property management activity was
27 inaccurate and incomplete. YGGII did not maintain an accurate daily balance of trust funds deposited
28 and disbursed. The balance in the bank statement did not match the control record after accounting

1 for deposits in transit and outstanding checks. Due to the inaccurate and incomplete recordkeeping,
2 YGGII had minimum unidentified shortages in TA 1 of <\$597.48> as of August 31, 2023.

3 35. As of August 31, 2023, based on a review of YGGII's General Ledger / Property
4 Ledgers and Reconciliation Report, there were differences between the balances for YGGII's
5 accounts "11000: Primary Bank Account" and "11050: Tenant Security Account." There were also
6 deposit and disbursement transactions that were recorded by YGGII but did not clear the bank during
7 the audit period.

8 36. Instead of recording transactions in YGGII's TA1 property ledger, transactions were
9 posted in the YGGII's adjustment account labeled "YGG Investment Inc Corporate Property – 15130
10 Ventura Blvd Ste #206, Sherman Oaks, CA 91403." YGGII's funds of \$7,416.48 deposited to cure
11 the shortage in a previous audit remained in YGGII's adjustment account instead of being posted to
12 the individual properties to cure the negative balances. YGGII also posted transactions in its
13 adjustment account that could not be verified as having cleared the bank or whether they were
14 accurate.

15 37. YGGII's failure to maintain complete and accurate control records for trust funds
16 received and disbursed for TA1 was in violation of **Code section 10145 and Regulation 2831.**

17 **Issue Five (5). Code Section 10145 and Regulation 2831.1: Separate Record for Each**
18 **Beneficiary or Transaction**

19 38. Complainant realleges and incorporates by reference all of the allegations contained
20 in the previous paragraphs as though fully set forth herein.

21 39. The separate records maintained for TA1, which was used for handling the receipts
22 and disbursements of rent trust funds in connection with YGGII's property management activity,
23 were inaccurate and incomplete. YGGII did not maintain an accurate total balance of TA1's separate
24 records of trust funds deposited and disbursed. The balance in the bank statement did not match the
25 total balance of TA1's separate records after accounting for deposits in transit and outstanding
26 checks. Due to the inaccurate and incomplete recordkeeping, YGGII had minimum unidentified
27 shortages in TA1 of <\$597.48> as of August 31, 2023.

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40. YGGII's failure to maintain an accurate separate record of the receipts and disbursements of all trust funds deposited into TA1, and YGGII's acts and/or omissions resulting in minimum unidentified shortages in TA1 of <\$597.48> as of August 31, 2023, were in violation of **Code section 10145 and Regulation 2831.1.**

Issue Six (6). Code Section 10145 and Regulation 2831.2: Trust Account Reconciliation

41. During the audit period, YGGII did not perform and maintain a monthly reconciliation comparing the balance of all the separate beneficiary or transaction records (separate records) to the balance of the record of all trust funds received and disbursed (control record) for TA1, resulting in minimum unidentified shortages in TA1 of <\$597.48> as of August 31, 2023. In addition, YGGII issued checks before the audit period that were outstanding and unlikely to clear.

42. YGGII's failure to perform and maintain an accurate monthly reconciliation comparing the balance of all separate beneficiary or transaction records (separate records) to the balance of the record of all trust funds received and disbursed (control record) for TA1, and YGGII's acts and/or omissions resulting in minimum unidentified shortages in TA1 of <\$597.48> as of August 31, 2023, were in violation of **Code section 10145 and Regulation 2831.2.**

Issue Seven (7). Code Section 10159.5 and Regulation 2731: Unlicensed Fictitious Business

Name

43. During the audit period, YGGII used the unlicensed fictitious business names "Real Property Management South San Fernando Valley," "rpmsouthsfv," "Real Property Management South SFV," "RPM South San Fernando Valley," and "RPM SSFV" to conduct its property management activities without first obtaining a license from the DRE for use of such fictitious names, in violation of **Code section 10159.5 and Regulation 2731.**

Issue Eight (8). Code Section 10161.8 and Regulation 2752: Failure to Notify DRE of Change of Responsible Broker

44. Complainant realleges and incorporates by reference all of the allegations contained in the previous paragraphs as though fully set forth herein.

45. On or about February 1, 2022, GOLOVIN signed a Sales Agent and Broker-Associate Employment Agreement with YGGII, and HANN signed the agreement on behalf of YGGII.

1 However, according to DRE records, from on or about March 18, 2020, to on or about October 4,
2 2023, GOLOVIN's RES license was affiliated with HANN.

3 46. On or about March 8, 2022, the DRE received a Salesperson Renewal Application,
4 form RE 209, certified by GOLOVIN through the DRE's eLicensing system, listing GOLOVIN's
5 responsible broker as HANN, not YGGII.

6 47. It was not until on or about October 5, 2023 that the DRE received a Salesperson
7 Change Application, form RE e214, from YGGII, certified by GOLOVIN and HANN on behalf of
8 YGGII, listing GOLOVIN's new responsible broker as YGGII.

9 48. YGGII's continuous failure to notify the DRE of GOLOVIN's affiliation with YGGII
10 as his responsible broker, from on or about February 6, 2022, to on or about October 4, 2023, was in
11 violation of **Code section 10161.8 and Regulation 2752.**

12 **Issue Nine (9). Code Section 10162 and Regulation 2715: Unauthorized Place of Business**

13 49. Complainant realleges and incorporates by reference all of the allegations contained
14 in the previous paragraphs as though fully set forth herein.

15 50. As discussed more fully above in Paragraph 45, on or about February 1, 2022,
16 GOLOVIN entered into a Sales Agent and Broker-Associate Employment Agreement with YGGII.
17 In that agreement, the signatories listed the address for YGGII as 15130 Ventura Blvd. # 206,
18 Sherman Oaks, CA, 91403. Therefore, from at least on or about February 1, 2022, YGGII performed
19 real estate activities from the address 15130 Ventura Blvd., # 206, Sherman Oaks, CA, 91403.

20 51. However, it was not until on or about July 24, 2023, after the DRE processed the
21 Officer Renewal Application it received from YGGII—which application, received by the DRE on
22 or about June 23, 2023, listed a change of YGGII's mailing address and main address—that YGGII's
23 address was properly updated to 15130 Ventura Blvd., # 206, Sherman Oaks, CA, 91403.

24 52. YGGII continuously failed to notify the DRE that YGGII changed the address of its
25 principal place of business from on or about February 2, 2022, to on or about June 23, 2023, in
26 violation of **Code section 10162 and Regulation 2715.**

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1 **Issue Ten (10). Code Section 10140.6 and Regulation 2773: Disclosure of Licensed Status in**
2 **Solicitation Materials – First Point of Contact with Consumers**

3 53. Complainant realleges and incorporates by reference all of the allegations contained
4 in the previous paragraphs as though fully set forth herein.

5 54. During the audit period, YGGII did not disclose its DRE license number on its website
6 www.rpmsouthsfv.com as the first point of contact with consumers, in violation of Code section
7 **10140.6 and Regulation 2773.**

8 **Issue Eleven (11). Code Sections 10159.2, 10177(h), and Regulation 2725: Responsibility of**
9 **Corporate Officer in Charge; Inadequate Broker Supervision**

10 55. Complainant realleges and incorporates by reference all of the allegations contained
11 in the previous paragraphs as though fully set forth herein.

12 56. Based on the above findings in Issues One (1) through Ten (10) above, as alleged in
13 Paragraphs 17 through 54 above, HANN, as the as the broker and designated officer of YGGII, did
14 not exercise adequate supervision and control over the real estate activities conducted on behalf of
15 YGGII by its employees and licensees to ensure compliance with the Real Estate Laws and
16 Regulations. HANN failed to establish policies, rules and systems to review, oversee, inspect, and
17 manage transactions. HANN's acts and/or omissions were in violation of Code sections **10159.2**
18 **and 10177(h), and Regulation 2725.**

19 **VIOLATIONS OF THE REAL ESTATE LAW – CAUSES FOR DISCIPLINE**

20 57. In the course of the activities described above in Paragraph 6, and based on the facts
21 discovered by the DRE, as alleged in Paragraphs 7 through 56 above, Respondents acted in violation
22 of the Real Estate Law as follows.

23 **FIRST CAUSE OF ACCUSATION AGAINST YGGII AND HANN:**

24 **AUDIT VIOLATIONS IN AUDIT NO. LA230014**

25 58. Complainant realleges and incorporates by reference all of the allegations contained
26 in the previous paragraphs as though fully set forth herein.

27 59. YGGII's conduct as alleged in Paragraphs 17 through 54 above, violated the Code
28 and the Regulations as set forth below:

<u>Issue No.</u>	<u>Paragraphs</u>	<u>Violations</u>
1	1	Code section 10145; Regulation 2832.1
2	2 and 3	Code section 10130
3	4	Code section 10145; Regulation 2831
4	5	Code section 10145; Regulation 2831.1
5	6	Code section 10145; Regulation 2831.2
6	7	Code section 10159.5; Regulation 2731
7	8	Code section 10161.8; Regulation 2752
8	9	Code section 10162; Regulation 2715
9	10	Code section 10140.6; Regulation 2773

60. The violations alleged above in paragraphs 17 through 54, constitute cause for the suspension or revocation of YGGII's real estate license and license rights under the provisions of Code sections 10177(d) and/or 10177(g).

61. HANN's conduct as alleged in in Paragraphs 55 through 56 above, violated the Code as set forth below:

<u>Issue No.</u>	<u>Paragraphs</u>	<u>Violations</u>
11	55-56	Code sections 10159.2 and 10177(h); Regulation 2725

62. The violations alleged above in paragraphs 55 through 56, constitute cause for the suspension or revocation of HANN's real estate license and license rights under the provisions of Code sections 10177(h), and 10177(d) and/or 10177(g).

SECOND CAUSE OF ACCUSATION AGAINST YGGII, HANN, AND GOLOVIN:
UNAUTHORIZED SIGNER ON TRUST FUND ACCOUNT

63. Complainant realleges and incorporates by reference all of the allegations contained in the previous paragraphs as though fully set forth herein.

64. At all relevant times, GOLOVIN has been, and continues to be, a 50% owner of YGGII, the corporate president and chief executive officer for YGGII, and a licensed RES.

65. On June 30, 2017, the DRE completed a previous audit examination of the books and records of YGGII's real estate activities that require a real estate license under Code section 10131. This audit examination revealed violations of the Code and the Regulations, as more fully discussed in Audit No. LA160061, including, but not limited to, a violation of Code section 10145 and Regulation 2834, for failing to include Gresalfi, YGGII's D.O. at the time, as an authorized signer

1 on YGGII's bank accounts used for handling property management trust funds, and for including
2 Yuliana Golovin, a non-licensee, as an authorized signer, able to make withdrawals, without fidelity
3 bond coverage.

4 66. On August 31, 2022, the DRE completed another previous audit examination of the
5 books and records of YGGII's real estate activities that require a real estate license under Code
6 section 10131. This audit examination revealed violations of the Code and the Regulations, as more
7 fully discussed in Audit No. LA160061, including, but not limited to, a violation of Code section
8 10145 and Regulation 2834, for failing to include HANN, YGGII's D.O. at the time, as an authorized
9 signer on YGGII's bank accounts used for handling property management trust funds, and for
10 continuing to include Gresalfi, YGGII's former D.O. who had resigned, as an authorized signer.

11 67. From on or about March 18, 2020, through on or about October 4, 2023, GOLOVIN
12 was retained as a RES by HANN and not YGGII, and GOLOVIN's RES license was affiliated with
13 HANN's REB license and not YGGII's REC license.

14 68. On or about May 27, 2020, GOLOVIN and HANN used DocuSign to digitally sign
15 the Seacoast bank signature card on behalf of YGGII, as authorized signers for TA1.

16 69. On or about June 1, 2020, YGGII's trust account, TA1, was opened with Seacoast
17 Commerce Bank, which later became Enterprise Bank & Trust ("EB&T"). From the opening of TA1,
18 GOLOVIN and HANN have been authorized signers on TA1 for YGGII. However, GOLOVIN's
19 RES license was not affiliated with YGGII until on or about October 5, 2023.

20 70. YGGII's, HANN's, and GOLOVIN's acts and/or omissions that resulted in
21 GOLOVIN being a signatory on TA1, and having authority to make withdrawals from TA1, while
22 GOLVIN's RES license was not affiliated with YGGII, were in violation of **Code Sections 10015.1,**
23 **10016, 10018.01, and 10145 and Regulation 2834,** and constitute cause for the suspension or
24 revocation of YGGII's, HANN's, and GOLOVIN's real estate licenses and license rights under the
25 provisions of **Code sections 10177(d) and/or 10177(g).**

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1 **THIRD CAUSE OF ACCUSATION AGAINST GOLOVIN AND HANN:**

2 **LICENSED ACTS PERFORMED FOR BROKER NOT RETAINING SALESPERSON**

3 71. Complainant realleges and incorporates by reference all of the allegations contained
4 in the previous paragraphs as though fully set forth herein.

5 72. From on or about March 18, 2020, through on or about October 4, 2023, GOLOVIN
6 was retained as a RES by HANN and not YGGII, and GOLOVIN's RES license was affiliated with
7 HANN's REB license and not YGGII's REC license.

8 73. During the time period that GOLOVIN was retained by HANN, and GOLOVIN's
9 RES license was affiliated with HANN's REB license and not YGGII's REC license, as alleged more
10 fully above in Paragraphs 23 through 32, GOLOVIN, in expectation of compensation and in a
11 continuous course of conduct: opened a trust account, TA1, on behalf of YGGII, and remained an
12 authorized signer for TA1 on behalf of YGGII; signed property management agreements on behalf
13 of YGGII; signed lease agreements on behalf of YGGII and property owners; advertised rental
14 listings on YGGII's website on behalf of property owners; continuously solicited business for real
15 estate activities on YGGII's website on behalf of property owners; continuously collected rents and
16 security deposits on behalf of YGGII and property owners, maintained in TA1; continuously
17 collected management fees from property owners on behalf of YGGII.

18 74. GOLOVIN's acts and/or omissions in performing real estate activities requiring a
19 license on behalf of YGGII, during the time period when GOLOVIN was retained by HANN, and
20 GOLOVIN's RES license was affiliated with HANN's REB license and not YGGII's REC license,
21 were in violation of Code Sections **10015.1, 10016, 10018.01, 10145, and 10177(d) and/or**
22 **10177(g), and Regulation 2834**, and constitute cause for the suspension or revocation of
23 GOLOVIN's real estate licenses and license rights under the provisions of **Code sections 10177(d)**
24 **and/or 10177(g).**

25 75. Based on the allegations above, HANN, as the responsible broker for GOLOVIN from
26 on or about March 18, 2020, through on or about October 4, 2023, is liable for the acts and/or
27 negligence of GOLOVIN. HANN's acts and/or omissions are in violation of **Code sections**

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1 10010.5(b)(2), 10177(d) and/or 10177(g), and constitute cause to suspend or revoke the real estate
2 licenses and license rights of HANN pursuant to Code sections 10177(d) and/or 10177(g).

3 **FOURTH CAUSE OF ACCUSATION AGAINST YGGII AND GOLOVIN:**

4 **NEGLIGENT OR INTENTIONAL MISREPRESENTATION**

5 76. Complainant realleges and incorporates by reference all of the allegations contained
6 in the previous paragraphs as though fully set forth herein.

7 77. From on or about March 18, 2020, through on or about October 4, 2023, during the
8 time period that GOLOVIN was retained by HANN, and GOLOVIN's RES license was affiliated
9 with HANN's REB license and not YGGII's REC license, GOLOVIN signed PMAs with property
10 owners, signed leases with tenants on behalf of property owners without disclosing the agency
11 relationship nor the , and engaged in property management activities requiring a license on behalf of
12 property owners.

13 78. Property owners B.P, J.W., and L.K. entered into PMAs with, and hired, YGGII
14 through GOLOVIN, based on GOLOVIN's signing the PMAs as the agent on behalf of YGGII dba
15 Real Property Management South San Fernando Valley or SFV, on or about October 21, 2022,
16 November 15, 2022, and September 1, 2023, respectively. B.P, J.W., and L.K. hired YGGII through
17 GOLOVIN based on GOLOVIN's implied or explicit representation that he was an agent of YGGII,
18 that YGGII was licensed, and that GOLOVIN's real estate license was affiliated with YGGII. By
19 reason of YGGII's believed licensure and GOLOVIN's license being represented as being affiliated
20 with YGGII's license, and YGGII and GOLOVIN being deemed to have specialized and professional
21 competence, expertise, knowledge and skill in property management, the property owners justifiably
22 relied on YGGII and GOLOVIN.

23 79. GOLOVIN signed lease agreements with tenants as follows:

24 a. On or about August 24, 2022, GOLOVIN signed a 12-month lease agreement,
25 for the term September 1, 2022, to August 31, 2023, with tenants D.J. and K.R.. for lease of
26 the Sunshine Property (main unit).

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1 b. On or about November 4, 2022, GOLOVIN signed a 12-month lease
2 agreement, for the term December 1, 2022, to November 30, 2023, with tenants X.L. and
3 H.C. for lease of the Dunswell Property.

4 c. On a date unknown but, on information and belief, believed to be between on
5 or about March 23, 2023, and April 1, 2023, GOLOVIN signed a 12-month lease agreement,
6 for the term April 1, 2023, to March 31, 2024, with tenant C.R. for lease of the Plummer
7 Property.

8 d. On or about April 13, 2023, GOLOVIN signed a 24-month lease agreement,
9 for the term April 15, 2023, to March 31, 2025, with tenant C.S. for lease of the Brownstone
10 Property.

11 80. In each of the four lease agreements identified above in Paragraph 79: a term was
12 included providing for the lease to become a month-to-month lease upon fulfillment of the original
13 lease period; the Lessor was identified only as Real Property Management South SFV; on the
14 signature page, GOLOVIN signed his name on the same line as Real Property Management South
15 SFV without identifying himself as a real estate salesperson or agent for a responsible broker; the
16 lease agreements contained no disclosure, and on information and belief no separate writing
17 containing a disclosure was provided to the property owners or the tenants, regarding the agency
18 relationship between YGGII dba Real Property Management South SFV and the property owners;
19 the lease agreements contained no disclosure of the name, telephone number, and address of the
20 property owner or a person who is authorized to act for and on behalf of the property owner for the
21 purpose of service of process and for the purpose of receiving and receipting for all notices and
22 demands.

23 81. YGGII's and GOLOVIN's representations, as alleged above in Paragraph 78, that
24 YGGII was licensed and that GOLOVIN's license was affiliated with YGGII's REC license, were
25 false. At the time YGGII and GOLOVIN made these representations, YGGII and GOLOVIN either
26 knew they were false, or had no reasonable grounds for believing the representations were true at the
27 time they made them.

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1 82. YGGII and GOLOVIN made these representations with the intention of inducing the
2 property owners to act in reliance on these representations, or with the expectation that they would
3 so act, so that the property owners would enter into PMAs with YGGII and authorize YGGII and
4 GOLOVIN to perform property management activities in expectation of compensation.

5 83. The property owners, in reliance on YGGII's and GOLOVIN's representations,
6 entered into the PMAs with YGGII. Had the property owners known the true facts that YGGII was
7 not licensed at the time these PMAs were executed, and that GOLOVIN's RES license was not
8 affiliated with YGGII's REC license, would not have entered int PMAs with YGGII.

9 84. YGGII's and GOLOVIN's representation in the lease agreements that Real Property
10 Management South SFV was the Lessor, was false. At the time YGGII and GOLOVIN made this
11 representation, YGGII and GOLOVIN either knew it was false, or had no reasonable grounds for
12 believing the representation was true at the time they made it.

13 85. The lease agreements identifying the Lessor as Real Property Management South SFV
14 and signed by GOLOVIN failed to reveal and suppressed the identities of the property owners and
15 the agency relationship between YGGII and the property owners, which identities and agency
16 relationship were known to YGGII and GOLOVIN at all relevant times. YGGII's and GOLOVIN's
17 false representation about the Lessor, and concealment and suppression of the identities of the
18 property owners and the existence of the agency relationship, potentially made the lease agreements
19 voidable and invalid.

20 86. YGGII and GOLOVIN made the representation that Real Property Management
21 South SFV was the Lessor, and concealed and suppressed the identities of the property owners and
22 the agency relationship between YGGII and the property owners in the lease agreements, with the
23 intention of inducing the tenants to act in reliance on the representation and the lack of identification
24 of the property owners, or with the expectation that they would so act, so that the tenants would enter
25 into the lease agreements with Real Property Management South SFV and agree to pay monthly rent
26 to Real Property Management South SFV.

27 87. The tenants, in reliance on YGGII's and GOLOVIN's representation that Real
28 Property Management South SFV was the Lessor, entered into the lease agreements with YGGII.

1 Had the tenants known the true facts that Real Property Management South SFV was not the Lessor
2 of each property at the time these lease agreements were executed, and that the property owners were
3 not identified, would not have entered into the lease agreements with YGGII.

4 88. YGGII's and GOLOVIN's acts and/or omissions in failing to disclose the true facts
5 to the property owners that YGGII was not licensed, and that GOLOVIN's RES license was not
6 affiliated with YGGII's REC license, and YGGII's and GOLOVIN's acts and/or omissions in failing
7 to disclose the true fact to the tenants that Real Property Management South SFV was not the Lessor
8 of each property, and in failing to disclose the identities of the property owners in the lease
9 agreements, were in violation of **Civil Code sections 1558 and 1962(a), and Code sections**
10 **10176(a), 10176(i), 10177(j), and 10177(d) and/or 10177(g)**, and constitute cause for the
11 suspension or revocation of YGGII's and GOLOVIN's real estate licenses and license right under
12 the provisions of **Code sections 10176(a), 10176(i), 10177(j), and 10177(d) and/or 10177(g)**.

13 **FIFTH CAUSE OF ACCUSATION AGAINST YGGII, HANN, AND GOLOVIN:**

14 **BREACHES OF FIDUCIARY DUTIES**

15 89. Complainant realleges and incorporates by reference all of the allegations contained
16 in the previous paragraphs as though fully set forth herein.

17 90. At all relevant times herein, while acting as the real estate broker, property manager,
18 and agent of their principals, YGGII, HANN, and GOLOVIN owed their principals fiduciary duties,
19 including, but not limited to, the following: duty of utmost care, integrity, honesty, and loyalty in
20 dealings with the principals; duty to diligently exercise reasonable care and skill in performing the
21 responsibilities of the relationship; duty to obey the instructions of the principals; duty to safeguard,
22 preserve and account for any trust funds or property entrusted to the agent by his or her principal;
23 duty to avoid conflicts of interest with the principal; duty to fully account in a timely manner for all
24 funds and property of the principal received and disbursed by the agent; duty to act at all times in the
25 best interests of the principal to the exclusion of all other interests, including interests that could
26 benefit the agent or others.

27 91. In the course of the activities described above in Paragraph 6, and based on the facts
28 discovered by the DRE, as alleged in Paragraphs 7 through 88 above, YGGII's, HANN's, and

1 GOLOVIN's acts and/or omissions constituted breaches of their fiduciary duties. Such breaches
2 include but are not limited to:

3 a. From on or about March 18, 2020, through on or about October 4, 2023, while
4 GOLOVIN was licensed to HANN's REB license and not to YGGII's REC license, in a
5 continuous course of conduct, YGGII, through HANN, allowed GOLOVIN to continuously
6 perform property management activities requiring a license on behalf of property owners with
7 whom YGGII had a real estate agency relationship, and failed to disclose to the property
8 owners that GOLOVIN had no authority to perform real estate activities requiring a license
9 while his RES license was not affiliated with YGGII's REC license.

10 b. From on or about August 30, 2022, through on or about July 23, 2023, while
11 YGGII's license was expired, YGGII, through HANN and GOLOVIN, continuously
12 performed property management activities without a valid REC license, and failed to disclose
13 to the property owners that YGGII's REC license was expired..

14 c. As alleged above in Paragraphs 79 to 80, between on or about August 24,
15 2022, and April 13, 2023, GOLOVIN, on behalf of YGGII, signed lease agreements with
16 tenants of the Sunshine, Dunswell, Plummer, and Brownstone Properties, falsely identifying
17 the Lessor as Real Property Management South SFV, failing to disclose the agency
18 relationship between YGGII and the property owners to the tenants, failing to disclose the
19 identities of the property owners, to the tenants and failing to disclose to the tenants the name,
20 telephone number, and address of the property owner or a person who is authorized to act for
21 and on behalf of the property owner for the purpose of service of process and for the purpose
22 of receiving and receipting for all notices and demands, all of which potentially made the
23 lease agreements voidable and invalid.

24 d. As of August 31, 2023, YGGII, through HANN and GOLOVIN:

25 (1) Allowed a minimum trust fund shortage of <\$597.48> in TA1;

26 (2) Failed to maintain complete and accurate control records for trust
27 funds received and disbursed for TA1;

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1 (3) Failed to maintain an accurate separate record of the receipts and
2 disbursements of all trust funds deposited into TA1; and

3 (4) Failed to perform and maintain an accurate monthly reconciliation
4 comparing the balance of all separate beneficiary or transaction records (separate
5 records) to the balance of the record of all trust funds received and disbursed (control
6 record) for TA1.

7 92. YGGII's, HANN's, and GOLOVIN's acts and/or omissions, as alleged in Paragraph
8 91 above, violated **Civil Code sections 2079.13(a), 2079.14, 2079.16, and 2079.17, and their**
9 **fiduciary duties** and constitute cause for the suspension or revocation of YGGII's, HANN's, and
10 GOLOVIN's real estate licenses and license rights under the provisions of and **Code sections**
11 **10177(d) and/or 10177(g).**

12 **SIXTH CAUSE OF ACCUSATION AGAINST YGGII AND GOLOVIN:**

13 **UNLAWFUL COMPENSATION**

14 93. Complainant realleges and incorporates by reference all of the allegations contained
15 in the previous paragraphs as though fully set forth herein.

16 94. On or about March 1, 2014, YGGII entered into an Owner Income Agreement with
17 GOLOVIN, which agreement provides that GOLOVIN, as the owner of YGGII, shall receive income
18 from YGGII in the form of: annual profit distributions, based on net income as determined by
19 YGGII's financial statements and tax filings; and owner draws, at the discretion of YGGII and
20 subject to available cash flow. The Owner Income Agreement provides that GOLOGIN "shall not be
21 compensated for specific property management services unless separately licensed and contracted in
22 accordance with California law." On information and belief, the Owner Income Agreement between
23 YGGII and GOLOVIN has been in continuous effect from on or about March 1, 2014, through the
24 present.

25 95. During tax years 2022 and 2023, YGGII reported earning profits on IRS Form 1120-S
26 (U.S. Income Tax Return for an S Corporation), and nonpassive income from Schedule K-1
27 (Shareholder's Share of Income, Deductions, Credits, etc.) which confirmed that GOLOVIN
28 received a share of YGGII's income as a shareholder in 2022 and 2023.

1 96. From on or about March 18, 2020, through on or about October 4, 2023, during the
2 time period that GOLOVIN was retained by HANN, and GOLOVIN's RES license was affiliated
3 with HANN's REB license and not YGGII's REC license, GOLOVIN continuously performed
4 property management activities requiring a license on behalf of YGGII, as alleged above in
5 Paragraphs 23 through 32, including, but not limited to signing PMAs with property owners, signing
6 lease agreements with tenants, advertising rental listings for properties managed by YGGII, soliciting
7 business on behalf of YGGII, collecting rents and security deposits on behalf of YGGII, collecting
8 management fees, and distributing trust funds to property owners.

9 97. Between on or about January 1, 2022, and on or about October 4, 2023, a time period
10 during which GOLOVIN's RES license was not affiliated with YGGII's REC license, and YGGII
11 was not the responsible broker retaining GOLOVIN, YGGII compensated GOLOVIN for performing
12 property management activities requiring a real estate license.

13 98. Between on or about January 1, 2022, and on or about October 4, 2023, a time period
14 during which GOLOVIN's RES license was not affiliated with YGGII's REC license, and YGGII
15 was not the responsible broker retaining GOLOVIN, GOLOVIN accepted compensation from
16 YGGII for performing property management activities requiring a real estate license, when YGGII
17 was a person and/or REC other than the broker under whom GOLOVIN was at the time licensed.

18 99. YGGII's acts and/or omissions in directly or indirectly causing compensation to be
19 paid to GOLOVIN for performing real estate activities requiring a real estate license, between on or
20 about January 1, 2022, and on or about October 4, 2023, a time period during which GOLOVIN's
21 RES license was not affiliated with YGGII's REC license, and YGGII was not the responsible broker
22 retaining GOLOVIN, were in violation of **Code sections 10137, and 10177(d) and/or 10177(g)**, and
23 constitute cause to suspend or revoke the real estate licenses and license rights of YGGII pursuant to
24 **Code sections 10177(d) and/or 10177(g)**.

25 100. GOLOVIN's acts and/or omissions in accepting compensation from YGGII for
26 performing property management activities requiring a real estate license, when YGGII was a person
27 and/or REC other than the broker under whom GOLOVIN was at the time licensed, were in violation
28 of **Code sections 10137, and 10177(d) and/or 10177(g)**, and constitute cause to suspend or revoke

1 the real estate licenses and license rights of GOLOVIN pursuant to Code sections 10177(d) and/or
2 10177(g).

3 **SEVENTH CAUSE OF ACCUSATION AGAINST YGGII AND GOLOVIN:**

4 **NEGLIGENCE, INCOMPETENCE AND/OR WILLFUL DISREGARD**

5 101. Complainant realleges and incorporates by reference all of the allegations contained
6 in the previous paragraphs as though fully set forth herein.

7 102. The overall conduct of YGGII and GOLOVIN, and each of them, is violative of the
8 Real Estate Law and constitutes cause for the suspension or revocation of the real estate licenses and
9 license rights of YGGII and GOLOVIN under the provisions of Code Section 10177(d) for willful
10 disregard of the Real Estate Law, and in the alternative, Code Section 10177(g) for negligence or
11 incompetence in performing acts for which a real estate license is required.

12 **EIGHTH CAUSE OF ACCUSATION AGAINST YGGI:**

13 **DESIGNATED OFFICER MUST BE OFFICER OF CORPORATION**

14 103. Complainant realleges and incorporates by reference all of the allegations contained
15 in the previous paragraphs as though fully set forth herein.

16 104. Pursuant to Code sections 10158, 10159, 10159.2, and 10211, and Regulation 2740,
17 the designated officer for an REC must be an officer of the corporation.

18 105. On or about March 20, 2020, the DRE received a Corporation License Application,
19 RE Form 201, from YGGI, certified by HANN under penalty of perjury, stating, among other things,
20 that HANN was "an official corporate officer," and that HANN's YGGI corporate officer title was
21 "Vice President."

22 106. On February 27, 2022, YGGI filed a Statement of Information with the California
23 Secretary of State's Office. In the section of this Statement of Information titled "Officers," the only
24 officers listed were GOLOVIN as Chief Executive Officer ("CEO") and Chief Financial Officer
25 ("CFO"), and Yuliana Golovin as Secretary. Yuliana Golovin has never been licensed by the DRE
26 as a real estate salesperson or broker. HANN was not listed in this Statement of Information as a
27 corporate officer.

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1 107. On April 13, 2023, YGGI filed another Statement of Information with the California
2 Secretary of State's Office. In the section of this Statement of Information titled "Officers," the only
3 officers listed were GOLOVIN as CEO and CFO, and Yuliana Golovin as Secretary. In the section
4 titled "Additional Officers," none were listed. HANN was not listed in this Statement of Information
5 as a corporate officer.

6 108. On February 22, 2024, YGGI filed another Statement of Information with the
7 California Secretary of State's Office. In the section of this Statement of Information titled
8 "Officers," the only officers listed were, again, GOLOVIN as CEO and CFO, and Yuliana Golovin
9 as Secretary. In the section titled "Additional Officers," none were listed. HANN was not listed in
10 this Statement of Information as a corporate officer.

11 109. On March 12, 2025, YGGI filed another Statement of Information with the California
12 Secretary of State's Office. In the section of this Statement of Information titled "Officers," the only
13 officers listed were, again, GOLOVIN as CEO and CFO, and Yuliana Golovin as Secretary. In the
14 section titled "Additional Officers," none were listed. HANN was not listed in this Statement of
15 Information as a corporate officer.

16 110. On February 25, 2026, YGGI filed another Statement of Information with the
17 California Secretary of State's Office. In the section of this Statement of Information titled
18 "Officers," the only officers listed were, again, GOLOVIN as CEO and CFO, and Yuliana Golovin
19 as Secretary. In the section titled "Additional Officers," none were listed. HANN was not listed in
20 this Statement of Information as a corporate officer.

21 111. Complainant is informed and believes and on such information and belief alleges that
22 YGGI's board of directors never formally appointed HANN as an officer of the corporation and/or
23 YGGI never formally appointed HANN as an officer of the corporation under provisions of the
24 articles of incorporation or corporate bylaws, as required by California Corporations Code section
25 312.

26 112. YGGI's acts and/or omissions in failing to appoint HANN as an officer of the
27 corporation and/or in failing to designate one of its corporate officers as its designated officer for
28 purposes of its REC license, were in violation of **Code sections 10159 and 10211, and Regulation**

1 2740, and constitute cause to suspend or revoke the real estate licenses and license rights of MMLI
2 pursuant to **Code sections 10177(d) and/or 10177(g)**.

3 **NINTH CAUSE OF ACCUSATION AGAINST HANN:**

4 **RESPONSIBILITY OF CORPORATE OFFICER IN CHARGE; BROKER SUPERVISION**

5 113. Complainant realleges and incorporates by reference all of the allegations contained
6 in the previous paragraphs as though fully set forth herein.

7 114. Based on the allegations contained in Paragraphs 6, and 7 through 112 above, and the
8 Second through Eighth Causes of Accusation above, HANN, as the broker of record and D.O. of
9 YGGII, did not exercise adequate supervision and control over the real estate activities conducted on
10 behalf of YGGII by its employees and licensees to ensure compliance with the Real Estate Laws and
11 Regulations. HANN's acts and/or omissions were in violation of **Code sections 10159.2 and**
12 **10177(h), and Regulation 2725**, and constitute cause to suspend or revoke the real estate licenses
13 and license rights of HANN pursuant to **Code sections 10177(h), and 10177(d) and/or 10177(g)**.

14 **INVESTIGATION AND ENFORCEMENT COSTS**

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

19 **AUDIT COSTS**

20 116. Code section 10148(b) provides, in pertinent part, the Commissioner shall charge a
21 real estate broker for the cost of any audit, if the Commissioner has found in a final decision following
22 a disciplinary hearing that the broker has violated Code section 10145 or a regulation or rule of the
23 Commissioner interpreting said section.

24 WHEREFORE, Complainant prays that a hearing be conducted on the allegations of this
25 Accusation and that upon proof thereof, a decision be rendered imposing disciplinary action against
26 all the licenses and license rights of YGG INVESTMENTS INC., DENIS M. HANN, and GEORGE
27 GOLOVIN under the Real Estate Law, for the costs of investigation, enforcement, and audits, as

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1 permitted by law, and for such other and further relief as may be proper under other applicable
2 provisions of law.

3 Dated at Los Angeles, California 09/28/2026.

4 *Ray Dagnino*

5 Ray Dagnino
6 Supervising Special Investigator

7 cc: YGG INVESTMENTS INC.
8 DENIS M. HANN
9 GEORGE GOLOVIN
10 Ray Dagnino
11 Sacto.
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