

STEVE CHU, Attorney (SBN 238155)  
Department of Real Estate  
320 West 4th Street, Suite 350  
Los Angeles, California 90013-1105

Telephone: (213) 559-5953  
Fax: (213) 576-6917

**FILED**

OCT 08 2025

DEPT. OF REAL ESTATE

By [REDACTED]

BEFORE THE DEPARTMENT OF REAL ESTATE  
STATE OF CALIFORNIA

\* \* \*

In the Matter of the Accusation of	)	No. H-43131 LA
	)	
GRAND CITY REALTY, INC and	)	<u>A C C U S A T I O N</u>
TIM HUI, individually and	)	
as designated officer of	)	
Grand City Realty, Inc.,	)	
	)	
Respondents.	)	
_____	)	

The Complainant, Ray Dagnino, a Supervising Special Investigator of the State of California, for cause of Accusation against GRAND CITY REALTY, INC and TIM HUI, individually and as designated officer of Grand City Realty, Inc. ("Respondents"), is informed and alleges as follows:

1.

The Complainant, Ray Dagnino, acting in his official capacity as a Supervising Special Investigator of the State of California, makes this Accusation against Respondents GRAND CITY REALTY, INC and TIM HUI.

///

///

Accusation of GRAND CITY REALTY, INC and TIM HUI

1 2.

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

4 LICENSE HISTORY

5 3.

6 Respondent GRAND CITY REALTY, INC ("GRAND CITY") presently has  
7 license rights under the Real Estate Law, Part 1 of Division 4 of the Code as a corporate real  
8 estate broker.

9 4.

10 Respondent TIM HUI ("HUI") presently has license rights as the designated  
11 officer of GRAND CITY.

12 5.

13 From February 11, 2014, to the present, Respondent GRAND CITY is licensed  
14 by the Department of Real Estate ("Department") as a corporate real estate broker by and  
15 through Respondent HUI, as the designated officer and broker responsible, pursuant to Code  
16 section 10159.2, for supervising the activities requiring a real estate license conducted on  
17 behalf of GRAND CITY, or by GRAND CITY'S officers, agents and employees.

18 BROKERAGE

19 GRAND CITY REALTY, INC

20 6.

21 At all times mentioned, in the City of Chino Hills, County of San Bernardino  
22 County, Respondent GRAND CITY acted as a real estate broker, conducting licensed activities  
23 within the meaning of Code section 10131(b) (leases or rents real property for others).

24 ///

25 ///

26 ///

27 ///

- 1
- 2
- 3
- 4
- 5
- 6
- 7
- 8
- 9
- 10
- 11
- 12
- 13
- 14
- 15
- 16
- 17
- 18
- 19
- 20
- 21
- 22
- 23
- 24
- 25
- 26
- 27

## 2

## 3

4  
5  
6  
7  
8  
9  
10

## 11

12

13

14

15

16

## 17

## 18

19  
20  
21

22

23

24

25

26

27

## Accusation of GRAND CITY REALTY, INC and TIM HUI

1           9(b)   Respondent GRAND CITY did not maintain a complete and accurate  
2 control record or general ledger of all trust funds received and disbursed, in violation of Code  
3 section 10145 and Regulations section 2831.

4           9(c)   Respondent GRAND CITY did not maintain a complete and accurate  
5 separate record of all trust funds received and disbursed for each beneficiary in connection with  
6 GRAND CITY'S broker activities, in violation of Code section 10145 and Regulations  
7 section 2831.1.

8           9(d)   Respondent GRAND CITY did not perform and maintain a monthly  
9 reconciliation of all the separate records with the control record of all trust funds received and  
10 disbursed, in violation of Code section 10145 and Regulations section 2831.2.

11          9(e)   Bank Account 1 used by Respondent GRAND CITY for trust funds wase  
12 not designated as a trust account and was not in the name of GRAND CITY as trustee or a  
13 fictitious name held by GRAND CITY'S real estate license as trustee, in violation of Code  
14 section 10145 and Regulations section 2832.

15          9(f)   Respondents GRAND CITY and HUI commingled with trust funds with  
16 HUI'S money in HUI'S personal bank account, in violation of Code sections 10145  
17 and 10176(e) and Regulations section 2835.

18          9(g)   Respondent GRAND CITY performed unauthorized disbursements from  
19 Bank Account 1, in violation of Code sections 10145 and 10176(i).

20          9(h)   Respondent GRAND CITY allowed unaffiliated licensee Cherish Hui to  
21 be an authorized signer and to make withdrawals from Bank Account 1 used by GRAND CITY  
22 for trust funds, and GRAND CITY failed to maintain a fidelity bond or insurance coverage at  
23 least equal to the maximum amount of the trust funds to which the individual had access at any  
24 time, in violation of Code section 10145 and Regulations section 2834.

25 ///

26 ///

27 ///

10.

The conduct, acts, or omissions of Respondents GRAND CITY and HUI, described in Paragraph 9 above, violated the Code and the Regulations as set forth below:

<u>PARAGRAPH</u>	<u>PROVISIONS VIOLATED</u>
9(a)	Code section 10145 and Regulations section 2832.1 (GRAND CITY)
9(b)	Code section 10145 and Regulations section 2831 (GRAND CITY)
9(c)	Code section 10145 and Regulations section 2831.1 (GRAND CITY)
9(d)	Code section 10145 and Regulations section 2831.2 (GRAND CITY)
9(e)	Code section 10145 and Regulations section 2832 (GRAND CITY)
9(f)	Code sections 10145 and 10176(e) and Regulations section 2835 (GRAND CITY and HUI)
9(g)	Code sections 10145 and 10176(i) (GRAND CITY)
9(h)	Code section 10145 and Regulations section 2834 (GRAND CITY)

The foregoing violations constitute cause for the suspension or revocation of all the licenses, license endorsements, and license rights of Respondent GRAND CITY under the Real Estate Law pursuant to the provisions of Code sections 10176(e), 10176(i), 10177(d) and 10177(g).

///

///

Accusation of GRAND CITY REALTY, INC and TIM HUI

1           The foregoing violations constitute cause for the suspension or revocation of all  
2 the licenses, license endorsements, and license rights of Respondent HUI under the Real Estate  
3 Law pursuant to the provisions of Code sections 10176(e), 10176(i), 10177(d) and 10177(g).

4                           SECOND CAUSE OF ACTION

5                           SUPERVISION AND COMPLIANCE

6   11.

7           The conduct, acts, or omissions of Respondent HUI, as described in  
8 Paragraphs 3 through 10 above, in failing to ensure compliance of the Real Estate Law by  
9 Respondent GRAND CITY, is in violation of Code section 10159.2 and Regulations  
10 section 2725, and subjects all the licenses, license endorsements, and license rights of HUI to  
11 suspension or revocation pursuant to Code sections 10177(d), 10177(g), and/or 10177(h).

12   12.

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

17   13.

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

23 ///

24 ///

25 ///

26 ///

27 ///

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 GRAND CITY REALTY, INC and TIM HUI under the Real Estate Law, for the  
5 cost of audit, investigation, and enforcement as permitted by law, and for such other and further  
6 relief as may be proper under other applicable provisions of law.

7  
8 Dated at Los Angeles, California

9 this 19<sup>th</sup> day of September, 2025.

10   
11 \_\_\_\_\_  
12 Ray Dagnino  
13 Supervising Special Investigator

14 cc:    GRAND CITY REALTY, INC  
15        TIM HUI  
16        Ray Dagnino  
17        Sacto.  
18        Audits