

1 Department of Real Estate
2 320 West Fourth Street, Suite 350
3 Los Angeles, California 90013-1105

4 Telephone: (213) 576-6982
5 -or- (213) 576-6910 (Direct)

FILED
JUN 30 2000
DEPARTMENT OF REAL ESTATE

6 By CS

7
8 BEFORE THE DEPARTMENT OF REAL ESTATE

9 STATE OF CALIFORNIA

10 * * *

11 In the Matter of the Accusation of)

12 JOHN STEVEN GOLIATH, individually)
13 and dba Home Town Escrow,)
14 RG Financial and Goltech Realty)
15 and as designated officer of)
16 Reginald Enterprises, Inc.)
17 and GERMAN ALFONSO RIVERA,)

18 Respondents.)

NO. H-28425 LA

STIPULATION AND AGREEMENT

17 It is hereby stipulated by and between GERMAN ALFONSO
18 RIVERA (hereinafter "Respondent") and the Complainant, acting by
19 and through Chris Leong, Counsel for the Department of Real
20 Estate, as follows for the purpose of settling and disposing of
21 the Accusation filed on February 18, 2000. The Accusation as to
22 JOHN STEVEN GOLIATH, individually and dba Home Town Escrow, RG
23 Financial and Goltech Realty and as designated officer of
24 Reginald Enterprises, Inc. will be handled separately.

25 1. All issues which were to be contested and all
26 evidence which was to be presented by Complainant and Respondent
27 at a formal hearing on the Accusation, which hearing was to be

1 held in accordance with the provisions of the Administrative
2 Procedure Act, shall instead and in place thereof be submitted
3 solely on the basis of the provisions of this Stipulation and
4 Agreement.

5 2. Respondent has received, read and understands the
6 Statement to Respondent, the Discovery Provisions of the
7 Administrative Procedure Act and the Accusation, filed by the
8 Department of Real Estate in this proceeding.

9 3. Respondent did not file a Notice of Defense
10 pursuant to Section 11505 of the Government Code for the purpose
11 of requesting a hearing on the allegations in the Accusation.
12 Respondent hereby freely and voluntarily did not file said
13 Notice of Defense. Respondent acknowledges that he understands
14 that by not filing said Notice of Defense he will thereby waive
15 his right to require the Commissioner to prove the allegations
16 in the Accusation at a contested hearing held in accordance with
17 the provisions of the Administrative Procedure Act and that
18 Respondent will waive other rights afforded to him in connection
19 with the hearing, such as the right to present evidence in
20 defense of the allegations in the Accusation and the right to
21 cross-examine witnesses.

22 4. In the interest of expedience and economy,
23 Respondent chooses not to contest the factual allegations in
24 Paragraphs 1 through 23 of the Accusation, but to remain silent
25 and understands that, as a result thereof, these factual
26 statements, without being admitted or denied, will serve as a
27 prima facie basis for the disciplinary action stipulated to



1 herein. The Real Estate Commissioner shall not be required to
2 provide further evidence to prove such allegations.

3 5. It is understood by the parties that the Real
4 Estate Commissioner may adopt the Stipulation and Agreement as
5 her Decision in this matter, thereby imposing the penalty and
6 sanctions on Respondent's real estate license and license rights
7 as set forth in the "Order" below. In the event that the
8 Commissioner in her discretion does not adopt the Stipulation
9 and Agreement, it shall be void and of no effect, and Respondent
10 shall retain the right to a hearing and proceeding on the
11 Accusation under all the provisions of the Administrative
12 Procedure Act and shall not be bound by any admission or waiver
13 made herein.

14 6. The Order or any subsequent Order of the Real
15 Estate Commissioner made pursuant to this Stipulation and
16 Agreement shall not constitute an estoppel, merger or bar to any
17 further administrative or civil proceeding by the Department of
18 Real Estate with respect to any matters which were not
19 specifically alleged to be causes for accusation in this
20 proceeding.

21 DETERMINATION OF ISSUES

22 By reason of the foregoing stipulations, admissions
23 and waivers and solely for the purpose of settlement of the
24 pending Accusation without a hearing, it is stipulated and
25 agreed that the following Determination of Issues shall be made:

26 The acts and omissions of Respondent, described in
27 Paragraphs 1 through 23 the Accusation, are cause for the

1 suspension or revocation of the real estate license and license
2 rights of Respondent under the provisions of Sections 10130 and
3 10177(g) of the Business and Professions.

4 ORDER

5 WHEREFORE, THE FOLLOWING ORDER is hereby made:

6 All licenses and licensing rights of Respondent GERMAN
7 ALFONSO RIVERA, under the Real Estate Law are revoked; provided,
8 however, a restricted real estate salesperson license shall be
9 issued to Respondent pursuant to Section 10156.5 of the Business
10 and Professions Code if Respondent makes application therefor
11 and pays to the Department of Real Estate the appropriate fee
12 for the restricted license within 90 days from the effective
13 date of this Decision. The restricted license issued to
14 Respondent shall be subject to all of the provisions of Section
15 10156.7 of the Business and Professions Code and to the
16 following limitations, conditions, and restrictions imposed
17 under authority of Section 10156.6 of that Code:

18 1. The restricted license issued to Respondent may be
19 suspended prior to hearing by Order of the Real Estate
20 Commissioner in the event of Respondent's conviction or plea of
21 nolo contendere to a crime which is substantially related to
22 Respondent's fitness or capacity as a real estate licensee.

23 2. The restricted license issued to Respondent may be
24 suspended after a hearing by Order of the Real Estate
25 Commissioner on evidence satisfactory to the Commissioner that
26 Respondent has violated provisions of the California Real Estate
27



1 Law, the Subdivided Lands Law, Regulations of the Real Estate
2 Commissioner or conditions attaching to the restricted license.

3 3. Respondent shall not be eligible to petition for
4 the issuance of an unrestricted real estate license nor for the
5 removal of any of the conditions, limitations or restrictions of
6 a restricted license until at least one year has elapsed from
7 the effective date of this Decision.

8 4. Respondent shall submit with any application for
9 license under an employing broker, or any application for
10 transfer to a new employing broker, a statement signed by the
11 prospective employing real estate broker on a form approved by
12 the Department of Real Estate which shall certify:

13 (a) That the employing broker has read the Decision
14 of the Commissioner which granted the right to a restricted
15 license; and

16 (b) That employing broker will exercise close
17 supervision over the performance by the restricted licensee
18 relating to activities for which a real estate license is
19 required.

20 5. Respondent shall, within nine months from the
21 effective date of this Decision, present evidence satisfactory
22 to the Real Estate Commissioner that Respondent has, since the
23 most recent issuance of an original or renewal real estate
24 license, taken and successfully completed the continuing
25 education requirements of Article 2.5 of Chapter 3 of the Real
26 Estate Law for renewal of a real estate license. If Respondent
27 fails to satisfy this condition, the Commissioner may order the



1 suspension of the restricted license until the Respondent
2 presents such evidence. The Commissioner shall afford
3 Respondent the opportunity for a hearing pursuant to the
4 Administrative Procedure Act to present such evidence.

5 6. Respondent shall, within six months from the
6 effective date of this Decision, take and pass the Professional
7 Responsibility Examination administered by the Department
8 including the payment of the appropriate examination fee. If
9 Respondent fails to satisfy this condition, the Commissioner may
10 order suspension of Respondent's license until Respondent passes
11 the examination.

12 7. Prior to the issuance of a restricted real estate
13 salesperson license, Respondent shall reimburse to Respondent,
14 JOHN STEVEN GOLIATH, all monies paid on his behalf in relation
15 to this matter.

16
17 DATED: 5/18/00

CHRIS LEONG
CHRIS LEONG, ESQ.
Counsel for Complainant


18
19 * * *

20 I have read the Stipulation and Agreement and its
21 terms are understood by me and are agreeable and acceptable to
22 me. I understand that I am waiving rights given to me by the
23 California Administrative Procedure Act (including but not
24 limited to Sections 11506, 11508, 11509 and 11513 of the
25 Government Code), and I willingly, intelligently and voluntarily
26 waive those rights, including the right of requiring the
27 Commissioner to prove the allegations in the Accusation at a

1 hearing at which I would have the right to cross-examine
2 witnesses against me and to present evidence in defense and
3 mitigation of the charges.

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DATED: 5-15-00



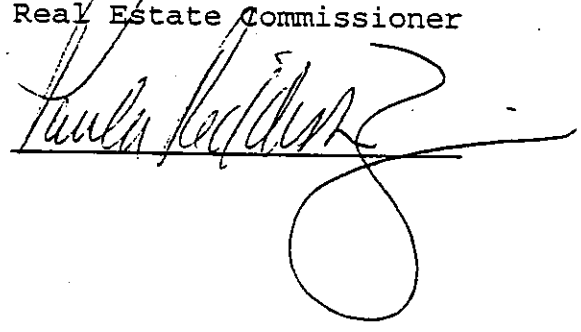
GERMAN ALFONSO RIVERA
Respondent

* * *

The foregoing Stipulation and Agreement is hereby
adopted as my Decision in this matter and shall become effective
at 12 o'clock noon on July 20, 2000

IT IS SO ORDERED June 20, 2000.

PAULA REDDISH ZINNEMANN
Real Estate Commissioner



1 Department of Real Estate
2 320 West Fourth Street, Suite 350
3 Los Angeles, California 90013-1105

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9 STATE OF CALIFORNIA

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12) NO. H-28425 LA
13 JOHN STEVEN GOLIATH, individually)
14 and dba Home Town Escrow,) STIPULATION AND AGREEMENT
15 RG Financial and Goltech Realty)
16 and as designated officer of)
17 Reginald Enterprises, Inc.)
18 and GERMAN ALFONSO RIVERA,)
19 Respondents.)

20 It is hereby stipulated by and between JOHN STEVEN
21 GOLIATH, individually and dba Home Town Escrow, RG Financial and
22 Goltech Realty and as designated officer of Reginald
23 Enterprises, Inc. (hereinafter "Respondent") and the
24 Complainant, acting by and through Chris Leong, Counsel for the
25 Department of Real Estate, as follows for the purpose of
26 settling and disposing of the Accusation filed on February 18,
27 2000. The Accusation as to GERMAN ALFONSO RIVERA will be
28 handled separately.

29 1. All issues which were to be contested and all
30 evidence which was to be presented by Complainant and Respondent

1 at a formal hearing on the Accusation, which hearing was to be
2 held in accordance with the provisions of the Administrative
3 Procedure Act, shall instead and in place thereof be submitted
4 solely on the basis of the provisions of this Stipulation and
5 Agreement.

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7 Statement to Respondent, the Discovery Provisions of the
8 Administrative Procedure Act and the Accusation, filed by the
9 Department of Real Estate in this proceeding.

10 3. Respondent did not file a Notice of Defense
11 pursuant to Section 11505 of the Government Code for the purpose
12 of requesting a hearing on the allegations in the Accusation.
13 Respondent hereby freely and voluntarily did not file said
14 Notice of Defense. Respondent acknowledges that he understands
15 that by not filing said Notice of Defense he will thereby waive
16 his right to require the Commissioner to prove the allegations
17 in the Accusation at a contested hearing held in accordance with
18 the provisions of the Administrative Procedure Act and that
19 Respondent will waive other rights afforded to him in connection
20 with the hearing, such as the right to present evidence in
21 defense of the allegations in the Accusation and the right to
22 cross-examine witnesses.

23 4. In the interest of expedience and economy,
24 Respondent chooses not to contest the factual allegations in
25 Paragraphs 1 through 23 of the Accusation, but to remain silent
26 and understands that, as a result thereof, these factual
27 statements, without being admitted or denied, will serve as a



1 prima facie basis for the disciplinary action stipulated to
2 herein. The Real Estate Commissioner shall not be required to
3 provide further evidence to prove such allegations.

4 5. It is understood by the parties that the Real
5 Estate Commissioner may adopt the Stipulation and Agreement as
6 her Decision in this matter, thereby imposing the penalty and
7 sanctions on Respondent's real estate license and license rights
8 as set forth in the "Order" below. In the event that the
9 Commissioner in her discretion does not adopt the Stipulation
10 and Agreement, it shall be void and of no effect, and Respondent
11 shall retain the right to a hearing and proceeding on the
12 Accusation under all the provisions of the Administrative
13 Procedure Act and shall not be bound by any admission or waiver
14 made herein.

15 6. The Order or any subsequent Order of the Real
16 Estate Commissioner made pursuant to this Stipulation and
17 Agreement shall not constitute an estoppel, merger or bar to any
18 further administrative or civil proceeding by the Department of
19 Real Estate with respect to any matters which were not
20 specifically alleged to be causes for accusation in this
21 proceeding.

22 DETERMINATION OF ISSUES

23 By reason of the foregoing stipulations, admissions
24 and waivers and solely for the purpose of settlement of the
25 pending Accusation without a hearing, it is stipulated and
26 agreed that the following Determination of Issues shall be made:

27 The acts and omissions of Respondent, described in



1 Paragraphs 1 through 23 the Accusation, are cause for the
2 suspension or revocation of the real estate license and license
3 rights of Respondent under the provisions of Sections 10130 and
4 10177(h) of the Business and Professions.

5 ORDER

6 WHEREFORE, THE FOLLOWING ORDER is hereby made:

7 All licenses and licensing rights of Respondent JOHN
8 STEVEN GOLIATH, individually and dba Home Town Escrow, RG
9 Financial and Goltech Realty and as designated officer of
10 Reginald Enterprises, Inc., under the Real Estate Law are
11 suspended for a period of sixty (60) days from the effective
12 date of this Decision; provided, however, that all of said
13 suspension shall be stayed for two (2) years upon the following
14 terms and conditions:

15 1. Respondent shall cure the shortage set forth in
16 Audit number LA 990291.

17 2. Respondent shall pay, pursuant to Section 10148 of
18 the Business and Professions Code, the Commissioner's reasonable
19 cost for an audit to determine if Respondent has corrected the
20 trust fund violations found in the Determination of Issues. In
21 calculating the amount of the Commissioner's reasonable cost,
22 the Commissioner may use the estimated average hourly salary for
23 all persons performing audits of real estate brokers, and shall
24 include an allocation for travel cost, including mileage, time
25 to and from the auditor's place of work, and per diem. The
26 Commissioner's reasonable costs shall in no event exceed
27 \$2,328.90. Respondent shall pay such cost within 45 days of

1 receiving an invoice from the Commissioner detailing the
2 activities performed during the audit and the amount of time
3 spent performing those activities. Notwithstanding the
4 provisions of any other paragraph herein, if Respondent fails to
5 pay, within 45 days from receipt of the invoice specified above,
6 the Commissioner's reasonable cost for an audit to determine if
7 Respondent has corrected the violations found in the
8 Determination of Issues, the Commissioner may order the
9 indefinite suspension of Respondent's real estate license and
10 license rights. The suspension shall remain in effect until
11 payment is made in full, or until Respondent enters into an
12 agreement satisfactory to the Commissioner to provide for such
13 payment. The Commissioner may impose further reasonable
14 disciplinary terms and conditions upon Respondent's real estate
15 license and license rights as part of any such agreement.

16 3. As a further condition of staying said suspension,
17 Respondent shall pay the Department, \$2,328.90 for Audit Number
18 LA 990291 and Audit Number LA 990237, prior to the effective
19 date of this Decision. If not paid, said suspension will
20 commence on the effective date of this Decision.

21 4. Respondent shall obey all laws, rules and
22 regulations governing the rights, duties and responsibilities of
23 a real estate licensee in the State of California; and

24 5. That no final subsequent determination be made
25 after hearing or upon stipulation, that cause for disciplinary
26 action occurred within two (2) years of the effective date of
27 this Decision. Should such a determination be made, the



1 Commissioner may, in her discretion, vacate and set aside the
2 stay order and reimpose all or a portion of the stayed
3 suspension.

4 If no further cause for disciplinary action against
5 the real estate license of Respondent occurs within two (2)
6 years from the effective date of this Decision and if the above
7 conditions are satisfied, the sixty (60) day stay hereby granted
8 shall become permanent.

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DATED: 4/27/00

CHRIS LEONG
CHRIS LEONG, ESQ.
Counsel for Complainant

* * *

I have read the Stipulation and Agreement and its terms
are understood by me and are agreeable and acceptable to me. I
understand that I am waiving rights given to me by the
California Administrative Procedure Act (including but not
limited to Sections 11506, 11508, 11509 and 11513 of the
Government Code), and I willingly, intelligently and voluntarily
waive those rights, including the right of requiring the
Commissioner to prove the allegations in the Accusation at a
hearing at which I would have the right to cross-examine
witnesses against me and to present evidence in defense and
mitigation of the charges.

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DATED: 4/21/2000

John S. Goliath

JOHN STEVEN GOLIATH,
individually and dba Home Town
Escrow, RG Financial and Goltech
Realty and as designated officer
of Reginald Enterprises, Inc.
Respondent

* * *

The foregoing Stipulation and Agreement is hereby
adopted as my Decision in this matter and shall become effective
at 12 o'clock noon on July 20, 2000

IT IS SO ORDERED June 26, 2000.

PAULA REDDISH ZINNEMANN
Real Estate Commissioner

Paula Reddish Zinnemann

2.

1 All Sections of Title 10, Chapter 6, California Code
2 of Regulations, are hereinafter referred to as "Regulations".
3 All further references to the "Code" are to the California
4 Business and Professions Code.
5

3.

6 At all times herein mentioned, GOLIATH was licensed
7 and/or had license rights with the Department of Real Estate of
8 the State of California "Department" as a real estate broker
9 individually and dba Home Town Escrow, RG Financial and Goltech
10 Realty and as designated officer of Reginald Enterprises, Inc.
11

4.

12 At all times herein mentioned, RIVERA was licensed
13 and/or had license rights with the Department as a real estate
14 salesperson. From April 20, 1998 to present, RIVERA was
15 employed by GOLIATH.
16

5.

17 At all times herein mentioned, in Los Angeles County,
18 California, Respondents acted as real estate brokers in the
19 State of California, within the meaning of Code Section
20 10131(a). In the operation of a real estate business, services
21 were rendered in connection with certain real properties owned
22 by third parties. The services included, but were not limited
23 to, soliciting and negotiating purchases and sales of real
24 property for compensation or in expectation of compensation.
25

6.

26 In about May, 1999, Brent and Shannon Bousfield
27



1 (Bousfield's) were owners of real property located at 14930
2 Cherry Grove Ct., Tustin, California (Cherry Grove Ct.
3 property). At that time, the Bousfields employed North Hills
4 Realty to list the Cherry Grove Ct. property for sale. At that
5 time, North Hills Realty employed real estate salesperson
6 Dorothy Action as an agent and to work on this listing.

7 7.

8 On or about May 24, 1999, Claudio Orellana (Orellana)
9 and Ester Giles (Giles) (Buyers) employed Respondent RIVERA to
10 prepare and present an offer to purchase the Cherry Grove Ct.
11 property. As part of this offer, RIVERA represented to Buyers
12 that \$5,000.00 was needed, \$500.00 of which was for "credit and
13 appraisal" and \$4,500.00 would be "for escrow". On May 24,
14 1999, in reliance on these representations, Buyers gave RIVERA a
15 Bank of America check, number 135, in the amount of \$5,000.00,
16 payable to "German Alfonso Rivera". RIVERA gave Buyers a
17 receipt, number 8725, for the \$5,000.00.

18 8.

19 Respondent RIVERA did not deposit these funds into his
20 broker trust account or deliver them to the owner or deposit
21 these funds in a neutral escrow within three days of receiving
22 the funds.

23 9.

24 Buyers specifically told RIVERA, as part of this
25 offer, that the maximum amount of monthly payments they could
26 afford would be \$1,500.00. RIVERA had Buyers sign blank forms
27 for the offer. Buyers requested copies of the forms they signed



1 but RIVERA refused to provide copies of the signed forms to
2 Buyers.

3 10.

4 Respondent RIVERA informed Orellana that the offer had
5 been accepted and that the payments would be \$1,980. Orellana
6 stated that he could not afford the payments. Respondent RIVERA
7 replied that if he (Orellana) did not sign the loan papers and
8 close escrow that he would lose the \$5,000.00.

9 11.

10 Buyers contacted RIVERA's broker GOLIATH and the
11 escrow company and requested that their funds be returned. On
12 about June 9, 1999, GOLIATH gave Buyers a check for \$3,000.00.
13 Also, on about June 9, 1999, RIVERA deposited a Washington
14 Mutual Official Check, number 380818964, in the amount of
15 \$2,000.00 payable to Burrow Escrow, into Burrow Escrow for
16 escrow number 89361-CWS. On this check the remitter was
17 "Gabriel Giles". Respondent RIVERA told Buyers that: "There
18 was a first-time buyers loan plan that we could qualify for
19 through FHA, but that the program was for people with little or
20 no money. If the Government knew we had that much money, they
21 would not help. We had to act like we had no money of our own;
22 that we had gotten the money from someone else. RIVERA
23 suggested that we say we were getting the money from Giles
24 instead of saying the money was ours."

25 12.

26 Buyers requested that the escrow be canceled and that
27 the remaining \$2,000.00 be refunded. The escrow was canceled;



1 however, the \$2,000.00 was not refunded to Buyers.

2 13.

3 On or about January 10, 2000, the Department completed
4 an audit, number LA 990237, of the activities of Respondent
5 GOLIATH regarding the Cherry Grove Ct. transaction. The records
6 were reviewed for the period from January 1, 1999 through
7 December 16, 1999. The results of the audit are set forth in
8 Paragraphs 14 and 15.

9 14.

10 During 1999, in connection with his real estate
11 business activities, Respondent GOLIATH accepted or received
12 funds in trust (trust funds) from or on behalf of tenants and
13 owners and thereafter made disbursements of such funds. These
14 funds were not maintained in a trust account.

15 15.

16 In connection with his real estate activities and
17 trust funds described in Paragraph 14, Respondent failed to
18 maintain a record of earnest fund deposits in excess of
19 \$1,000.00 that were directly forwarded to escrow, in violation
20 of Regulation 2831.

21 16.

22 On or about January 11, 2000, the Department completed
23 an audit, number LA 990291, of the mortgage loan broker
24 activities of Respondent GOLIATH. The records were reviewed for
25 the period from January 1, 1999 through December 16, 1999. The
26 results of the audit are set forth in Paragraphs 16 and 17.

27 /////



1 During 1999, in connection with his real estate
 2 business activities, Respondent GOLIATH accepted or received
 3 trust funds from or on behalf of tenants and owners and
 4 thereafter made disbursements of such funds. These funds were
 5 maintained in two accounts at Sanwa Bank, 701 East First Street,
 6 Tustin, CA 92780. The first account was named John S. Goliath
 7 DBA Home Town Escrow, account number 0163-19538 (A#1). The
 8 second account was named John S. Goliath DBA Home Town Escrow
 9 Trust Account, account number 0167-14613 (A#2).
 10

11 In connection with his real estate activities and
 12 trust funds described in Paragraph 17, Respondent:
 13

14 (a) failed to maintain adequate record of trust funds
 15 received and deposited, in violation of Regulation 2831;

16 (b) failed to maintain adequate separate records of
 17 deposit and disbursement information for each escrow, in
 18 violation of Regulation 2831.1;

19 (c) failed to monthly reconcile separate records to
 20 the control account records, in violation of Regulation 2831.2;

21 (d) failed to designate A#1 as a trust account, in
 22 violation of Regulation 2832; and

23 (e) allowed unlicensed, unbonded persons Teresa
 24 Diccicio to be a signatory on A#1 and Vickie Schlom to be a
 25 signatory on A#2, in violation of Regulation 2834.

26 //

27 //



19.

1 On or about July 8, 1993, an Order to Desist and
2 Refrain was filed against JOHN STEVEN GOLIATH, individually and
3 as designated officer of Noble Mortgage. This Order stated that
4 GOLIATH violated Code Sections 10145, 10161.8(a) and 10240 and
5 Regulations 2725, 2831.1, 2832.1 and 2840.
6

20.

7
8 The conduct of Respondent RIVERA, in handling trust
9 funds, as alleged in Paragraphs 1 through 18, constitutes
10 violation under Code Section 10145(c). Said conduct is cause
11 pursuant to Code Section 10177(d) for the suspension or revocation
12 of all licenses and license rights of Respondent RIVERA under the
13 Real Estate Law.

21.

14 The conduct of Respondent RIVERA, in making trust
15 funds appear to have come from a third party and arranging a
16 loan which payments are above the amount instructed and
17 threatening borrowers with the loss of their deposit,
18 constitutes fraud and dishonest dealing and negligence and is a
19 violation of Code Sections 10176(i) and 10177(g). Said conduct
20 and violations are cause for the suspension or revocation of all
21 licenses and license rights of Respondent RIVERA under the Real
22 Estate Law.
23

22.

24 The conduct of Respondent GOLIATH, in handling trust
25 funds, as alleged in Paragraphs 1 through 18, constitutes
26 violation under Code Section 10145 and Regulations 2831, 2831.1,
27



1 2831.2, 2832 and 2834. Said conduct is cause pursuant to Code
2 Section 10177(d) for the suspension or revocation of all
3 licenses and license rights of Respondent GOLIATH under the Real
4 Estate Law.

5 23.

6 The conduct of Respondent GOLIATH, in failing to
7 supervise RIVERA, constitutes violation under Code Section
8 10177(h). Said conduct is cause pursuant to Code Section
9 10177(h) for the suspension or revocation of all licenses and
10 license rights of Respondent GOLIATH under the Real Estate Law.

11 . WHEREFORE, Complainant prays that a hearing be
12 conducted on the allegations of this Accusation and that upon
13 proof thereof, a decision be rendered imposing disciplinary
14 action against all licenses and license rights of
15 Respondents, JOHN STEVEN GOLIATH, individually and dba Home
16 Town Escrow, RG Financial and Goltech Realty and as
17 designated officer of Reginald Enterprises, Inc. and GERMAN
18 ALFONSO RIVERA, under the Real Estate Law (Part 1 of Division
19 4 of the Business and Professions Code), and for such other
20 and further relief as may be proper under other applicable
21 provisions of law.

22 Dated at Los Angeles, California
23 this 18th day of February, 2000.

24 _____
25 Deputy Real Estate Commissioner

26 cc: John Steven Goliath
27 German Alfonso Rivera
Sacto.
LA Audit Section/Revilla
RJ