

1 Department of Real Estate
2 320 West 4th Street, Ste. 350
3 Los Angeles, California 90013-1105
4 Telephone: (213) 576-6982 (office)

FILED

APR 13 2009

DEPARTMENT OF REAL ESTATE
BY: *[Signature]*

8 BEFORE THE DEPARTMENT OF REAL ESTATE
9 STATE OF CALIFORNIA

10 * * *

11 In the Matter of the Accusation of) No. H-35244 LA
12)
13 PIONEER FINANCIAL CORPORATION;)
14 RM CER CORPORATION, doing business) STIPULATION
15 as Re/Max of Cerritos; and)
16 GRACE C. HU, individually and) AND
as designated officer of Pioneer)
Financial Corporation and)
RM CER Corporation,)
Respondents,)

17 It is hereby stipulated by and between Respondents
18 PIONEER FINANCIAL CORPORATION, RM CER CORPORATION and GRACE C. HU,
19 individually and as designated officer of Pioneer Financial
20 Corporation and RM CER Corporation (sometimes collectively
21 referred to as "Respondents"), represented by Rose Pothier, Esq.
22 and the Complainant, acting by and through Elliott Mac Lennan,
23 Counsel for the Department of Real Estate, as follows for the
24 purpose of settling and disposing of the Accusation
25 ("Accusation") filed on August 27, 2008, in this matter:
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1 1. All issues which were to be contested and all
2 evidence which was to be presented by Complainant and Respondents
3 at a formal hearing on the Accusation, which hearing was to be
4 held in accordance with the provisions of the Administrative
5 Procedure Act ("APA"), shall instead and in place thereof be
6 submitted solely on the basis of the provisions of this
7 Stipulation and Agreement ("Stipulation").

8 2. Respondents have received, read and understand the
9 Statement to Respondent, the Discovery Provisions of the APA and
10 the Accusation filed by the Department of Real Estate in this
11 proceeding.

12 3. Respondents timely filed a Notice of Defense
13 pursuant to Section 11506 of the Government Code for the purpose
14 of requesting a hearing on the allegations in the Accusation.
15 Respondents hereby freely and voluntarily withdraw said Notice of
16 Defense. Respondents acknowledge that they understand that by
17 withdrawing said Notice of Defense they thereby waive their right
18 to require the Commissioner to prove the allegations in the
19 Accusation at a contested hearing held in accordance with the
20 provisions of the APA and that they will waive other rights
21 afforded to them in connection with the hearing such as the right
22 to present evidence in their defense and the right to cross-
23 examine witnesses.
24

25 4. This Stipulation is based on the factual.
26 allegations contained in the Accusation. In the interest of
27

1 expedience and economy, Respondents choose not to contest these
2 allegations, but to remain silent and understand that, as a
3 result thereof, these factual allegations, without being admitted
4 or denied, will serve as a prima facie basis for the disciplinary
5 action stipulated to herein. The Real Estate Commissioner shall
6 not be required to provide further evidence to prove said factual
7 allegations.

8 5. This Stipulation is made for the purpose of
9 reaching an agreed disposition of this proceeding and is
10 expressly limited to this proceeding and any other proceeding or
11 case in which the Department of Real Estate ("Department"), the
12 state or federal government, or any agency of this state, another
13 state or federal government is involved.

14 6. It is understood by the parties that the Real
15 Estate Commissioner may adopt this Stipulation as his Decision in
16 this matter thereby imposing the penalty and sanctions on
17 Respondents' real estate licenses and license rights as set forth
18 in the "Order" herein below. In the event that the Commissioner
19 in his discretion does not adopt the Stipulation, it shall be
20 void and of no effect and Respondents shall retain the right to a
21 hearing and proceeding on the Accusation under the provisions of
22 the APA and shall not be bound by any stipulation or waiver made
23 herein.
24

25 7. The Order or any subsequent Order of the Real
26 Estate Commissioner made pursuant to this Stipulation shall not
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1 constitute an estoppel, merger or bar to any further
2 administrative or civil proceedings by the Department of Real
3 Estate with respect to any matters which were not specifically
4 alleged to be causes for Accusation in this proceeding but do
5 constitute a bar, estoppel and merger as to any allegations
6 actually contained in the Accusations against Respondent herein.

7 8. Respondents understand that by agreeing to this
8 Stipulation, Respondents agree to pay, pursuant to Business and
9 Professions Code Section 10148, the cost of the audit. The
10 amount of said cost for the audit is \$2,046.56.

11 9. Respondents have received, read, and understand the
12 "Notice Concerning Costs of Subsequent Audit". Respondents
13 further understand that by agreeing to this Stipulation, the
14 findings set forth below in the Determination of Issues become
15 final, and the Commissioner may charge Respondents for the cost
16 of any subsequent audit conducted pursuant to Business and
17 Professions Code Section 10148 to determine if the violations
18 have been corrected. The maximum cost of the subsequent audit
19 will not exceed \$2,046.56.
20

21 DETERMINATION OF ISSUES

22 By reason of the foregoing, it is stipulated and agreed
23 that the following determination of issues shall be made:

24 I.

25 The conduct, acts or omissions of PIONEER FINANCIAL
26 CORPORATION and GRACE C. HU, as described in Paragraph 4, above,
27

1 are in violation of Section 10240 of the Business and Professions
2 Code ("Code") and Section 2840 of Title 10, Chapter 6 of the
3 California Code of Regulations ("Regulations") and is a basis for
4 discipline of Respondents' license and license rights as
5 violation of the Real Estate Law pursuant to Code Section
6 10177(d).

7 II.

8 The conduct, acts or omissions of RM CER CORPORATION and
9 GRACE C. HU, as described in Paragraph 4, above, are in violation
10 of Code Section 10145 and Regulation 2832(d) and is a basis for
11 discipline of Respondents' license and license rights as
12 violation of the Real Estate Law pursuant to Code Section
13 10177(d).

14 III.

15 The conduct, acts or omissions of GRACE C. HU, as
16 described in Paragraph 4, above, constitutes a failure to keep
17 PIONEER FINANCIAL CORPORATION and RM CER CORPORATION in compliance
18 with the Real Estate Law during the time that Respondent was the
19 officer designated by a corporate broker licensee in violation of
20 Section 10159.2 of the Code. This conduct is a basis for the
21 suspension or revocation of Respondent's license pursuant to Code
22 Section 10177(h).

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ORDER

WHEREFORE, THE FOLLOWING ORDER is hereby made:

I.

All licenses and licensing rights of Respondents

PIONEER FINANCIAL CORPORATION and RM CER CORPORATION, under the
Real Estate Law are suspended for a period of sixty (60) days

from the effective date of this Decision; provided, however, that if Respondents request, the initial thirty (30) days of said suspension (or a portion thereof) shall be stayed upon condition that:

A 1. Respondent PIONEER FINANCIAL CORPORATION and
RM CER CORPORATION pay a monetary penalty pursuant to Section
10175.2 of the Business and Professions Code at the rate of \$33.33 per day for each day of the suspension for a monetary penalty of \$1,000 each, totaling \$2,000.

2. Said payment shall be in the form of a cashier's
check or certified check made payable to the Recovery Account of the Real Estate Fund. Said check must be received by the Department prior to the effective date of the Decision in this matter.

3. No further cause for disciplinary action against
the real estate licenses of Respondents occurs within two (2) years from the effective date of the Decision in this matter.

4. If Respondents fail to pay the monetary penalty in
accordance with the terms of the Decision, the Commissioner may,

1 without a hearing, order the immediate execution of all or any
2 part of the stayed suspension, in which event the Respondents
3 shall not be entitled to any repayment nor credit, prorated or
4 otherwise, for money paid to the Department under the terms of
5 this Decision.

6 5. If Respondents pay the monetary penalty and if no
7 further cause for disciplinary action against the real estate
8 license of Respondent occurs within two (2) years from the
9 effective date of the Decision, the stay hereby granted shall
10 become permanent

11 B. The remaining thirty (30) days of the sixty (60)
12 day suspension shall be stayed for two (2) years upon the
13 following terms and conditions:

14 (a) Respondents shall obey all laws, rules and
15 regulations governing the rights, duties and responsibilities of
16 a real estate licensee in the State of California; and

17 (b) That no final subsequent determination be made
18 after hearing or upon stipulation, that cause for disciplinary
19 action occurred within two (2) years from the effective date of
20 this Decision. Should such a determination be made, the
21 Commissioner may, in his discretion, vacate and set aside the
22 stay order and reimpose all or a portion of the stayed
23 suspension. Should no such determination be made, the stay
24 imposed herein shall become permanent.
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II.

All licenses and licensing rights of Respondent

GRACE C. HU under the Real Estate Law are suspended for a period of sixty (60) days from the effective date of this Decision; provided, however, that sixty (60) days of said suspension shall be stayed for two years upon the following terms and conditions:

(1) Respondent shall obey all laws, rules and regulations governing the rights, duties and responsibilities of a real estate licensee in the State of California; and

(2) That no final subsequent determination be made after hearing or upon stipulation, that cause for disciplinary action occurred within two (2) years from the effective date of this Decision. Should such a determination be made, the Commissioner may, in his discretion, vacate and set aside the stay order and reimpose all or a portion of the stayed suspension. Should no such determination be made, the stay imposed herein shall become permanent.

III.

Pursuant to Section 10148 of the Business and

Professions Code, Respondents PIONEER FINANCIAL CORPORATION, RM CER CORPORATION and GRACE C. HU, shall be jointly and severally liable to pay the Commissioner's reasonable cost for (a) the audit which led to this disciplinary action (b) a subsequent audit to determine if Respondents are now in compliance with the Real Estate Law. The cost of the audit which led to this

1 disciplinary action is \$2,046.56. In calculating the amount of
2 the Commissioner's reasonable cost, the Commissioner may use the
3 estimated average hourly salary for all persons performing audits
4 of real estate brokers, and shall include an allocation for
5 travel time to and from the auditor's place of work. Said amount
6 for the prior and subsequent audits shall not exceed \$4,093.12

7 Respondents shall pay such cost within 60 days of
8 receiving an invoice from the Commissioner detailing the
9 activities performed during the audit and the amount of time
10 spent performing those activities.

11 The Commissioner may suspend the license of Respondents
12 pending a hearing held in accordance with Section 11500, et seq.,
13 of the Government Code, if payment is not timely made as provided
14 for herein, or as provided for in a subsequent agreement between
15 the Respondent and the Commissioner. The suspension shall remain
16 in effect until payment is made in full or until Respondents
17 enter into an agreement satisfactory to the Commissioner to
18 provide for payment, or until a decision providing otherwise is
19 adopted following a hearing held pursuant to this condition.
20

21 IV.

22 All licenses and licensing rights of Respondent GRACE
23 C. HU are indefinitely suspended unless or until Respondent
24 provides proof satisfactory to the Commissioner, of having taken
25 and successfully completed the continuing education course on
26 trust fund accounting and handling specified in paragraph (3) of
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1 subdivision (a) of Section 10170.5 of the Business and
2 Professions Code. Proof of satisfaction of this requirement
3 includes evidence that respondent has successfully completed the
4 trust fund account and handling continuing education course
5 within 120 days prior to or by the effective date of the Decision
6 in this matter.

7 V.

8 A. Respondent GRACE C. HU, shall not conduct broker-
9 controlled escrows pursuant to California Financial Code Section
10 17006(a)(4) as long as the California Department of Corporation
11 escrow agent employment bar order is in effect pursuant to the
12 Department of Corporation's stipulation of February 9, 2005 re
13 the Notice of Intention to Issue Order Pursuant to California
14 Financial Code Sections 17608 and 17423.

15 B. Respondents PIONEER FINANCIAL CORPORATION and RMCER
16 CORPORATION, shall not conduct broker-controlled escrows pursuant
17 to California Financial Code Section 17006(a)(4) as long as the
18 GRACE C. HU is the designated officer; and

19 C. This provision herein shall not constitute a waiver
20 of any defense, including specifically a Statute of Limitations
21 defense, related to the Department of Corporation stipulation
22 mentioned herein.

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4 DATED: 1-8-09

EJL
ELLIOTT MAC LENNAN, Counsel for
the Department of Real Estate

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7 * * *

8 EXECUTION OF THE STIPULATION

9 We have read the Stipulation and discussed it with our
10 counsel. Its terms are understood by us and are agreeable and
11 acceptable to us. We understand that we are waiving rights given
12 to us by the California Administrative Procedure Act (including
13 but not limited to Sections 11506, 11508, 11509 and 11513 of the
14 Government Code), and we willingly, intelligently and voluntarily
15 waive those rights, including the right of requiring the
16 Commissioner to prove the allegations in the Accusation at a
17 hearing at which we would have the right to cross-examine
18 witnesses against us and to present evidence in defense and
19 mitigation of the charges.
20

21 MAILING AND FACSIMILE

22 Respondents (1) shall mail the original signed
23 signature page of the stipulation herein to Elliott Mac Lennan:
24 Attention: Legal Section, Department of Real Estate, 320 W.
25 Fourth St., Suite 350, Los Angeles, California 90013-1105.
26 Additionally, Respondents shall also (2) facsimile a copy of
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signed signature page, to the Department at the following
facsimile number: 213.576.6917, Attention: Elliott Mac Lennan.

A facsimile constitutes acceptance and approval of the
terms and conditions of this stipulation. Respondents agree,
acknowledge and understand that by electronically sending to the
Department a facsimile copy of Respondents' actual signature as
they appear on the stipulation that receipt of the facsimile copy
by the Department shall be as binding on Respondents as if the
Department had received the original signed stipulation.

DATED: 1-27-09

Grace Hu
PIONEER FINANCIAL CORPORATION, a
corporate real estate broker,
BY: GRACE C. HU D.O., Respondent

DATED: 1-27-09

Grace Hu
RM CER FINANCIAL CORPORATION, a
corporate real estate broker,
BY: GRACE C. HU D.O., Respondent

DATED: 1-27-09

Grace Hu
GRACE C. HU, individually and as
designated officer of Pioneer
Financial Corporation and RM CER
Corporation, Respondent

DATED: 1-27-09

Rose Pothier
ROSE POTHIER, ESQ.
Attorney for Respondents
Approved as to form

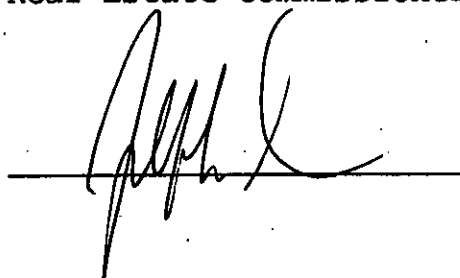
* * *

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3 The foregoing Stipulation and Agreement is hereby
4 adopted as my Decision as to Respondents PIONEER FINANCIAL
5 CORPORATION, RM CER CORPORATION and GRACE C. HU, individually and
6 as designated officer of Pioneer Financial Corporation and RM CER
7 Corporation, and shall become effective at
8 12 o'clock noon on May 13 , 2009.

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10 IT IS SO ORDERED 3/29 , 2009.

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12 JEFF DAVI
13 Real Estate Commissioner

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A handwritten signature in black ink, appearing to read 'Jeff Davi', is written over a horizontal line. The signature is cursive and somewhat stylized.

1 ELLIOTT MAC LENNAN, SBN 66674
2 Department of Real Estate
3 320 West 4th Street, Ste. 350
4 Los Angeles, California 90013-1105

5 Telephone: (213) 576-6911 (direct)
6 -or- (213) 576-6982 (office)

FILED

AUG 27 2008

DEPARTMENT OF REAL ESTATE
BY: *[Signature]*

8 BEFORE THE DEPARTMENT OF REAL ESTATE
9 STATE OF CALIFORNIA

10 * * *

11 In the Matter of the Accusation of)
12 PIONEER FINANCIAL CORPORATION;)
13 RMCER CORPORATION doing business)
14 as Re/Max of Cerritos; and)
15 GRACE C. HU, individually and)
16 as designated officer of Pioneer)
17 Financial Corporation and)
18 RMCER Corporation,)
19 Respondents.)

No. H- 35244 LA
A C C U S A T I O N

19 The Complainant, Robin Trujillo, a Deputy Real Estate
20 Commissioner of the State of California, for cause of Accusation
21 against PIONEER FINANCIAL CORPORATION, RMCER CORPORATION doing
22 business as e/Max of Cerritos; and GRACE C. HU, individually and
23 as designated officer of Pioneer Financial Corporation and RMCER
24 Corporation, alleges as follows:

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1.

1 The Complainant, Robin Trujillo, acting in her official
2 capacity as a Deputy Real Estate Commissioner of the State of
3 California, makes this Accusation against PIONEER FINANCIAL
4 CORPORATION, RMCER CORPORATION and GRACE C. HU.
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7 All references to the "Code" are to the California
8 Business and Professions Code and all references to "Regulations"
9 are to Title 10, Chapter 6, California Code of Regulations.
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11 LICENSE HISTORY

3.

12 A. At all times mentioned, PIONEER FINANCIAL
13 CORPORATION ("PIONEER") was licensed or had license rights issued
14 by the Department of Real Estate ("Department") as a real estate
15 broker.
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17 B. At all times material herein, PIONEER was licensed
18 by the Department of Real Estate of the State of California
19 (hereinafter "Department") as a corporate real estate broker by
20 and through HU, as the designated officer and broker responsible,
21 pursuant to Code Section 10159.2 of the Business and Professions
22 Code for supervising the activities requiring a real estate
23 license conducted on behalf PIONEER of by PIONEER's officers,
24 agents and employees, including HU. PIONEER was originally
25 licensed as a corporate real estate broker on March 17, 1994. HU
26 has been the designated officer since March 1, 2004.
27

1 C. At all times mentioned, RMCER CORPORATION ("RMCER")
2 was licensed or had license rights issued by the Department of
3 Real Estate ("Department") as a real estate broker.

4 D. At all times material herein, RMCER was licensed by
5 the Department of Real Estate of the State of California
6 (hereinafter "Department") as a corporate real estate broker by
7 and through HU, as the designated officer and broker responsible,
8 pursuant to Code Section 10159.2 of the Business and Professions
9 Code for supervising the activities requiring a real estate
10 license conducted on behalf RMCER of by RMCER's officers, agents
11 and employees, including HU. RMCER was originally licensed as a
12 corporate real estate broker on December 17, 2007. HU has been
13 the designated officer since December 17, 2003; and;

14 E. At all times material herein, HU was licensed by
15 the Department as a real estate broker. HU was initially
16 licensed as a real estate broker on September 6, 1985.

17 BROKERAGE

18 4.

19 A. At all times mentioned, in the City of Artesia,
20 County of Los Angeles, PIONEER acted as a real estate broker
21 conducting licensed activities within the meaning of Code Section
22 10131(d) by operating a mortgage and loan brokerage. PIONEER
23 engaged in activities with the public wherein lenders and
24 borrowers were solicited for loans secured directly or
25 collaterally by liens on real property, wherein such loans were
26 arranged, negotiated, processed and consummated on behalf of
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1 others for compensation or in expectation of compensation and for
2 fees often collected in advance; and

3 B. At all times mentioned, in the City of Cerritos,
4 County of Los Angeles, RMCER acted as a real estate broker
5 conducting licensed activities within the meaning of Code Section
6 10131(a) by operating a residential resale brokerage engaged in
7 the business of, acted in the capacity of, advertised or assumed
8 to act as a real estate broker, including the solicitation for
9 listings of and the negotiation of the sale of real property as
10 the agent of others.

11 FIRST CAUSE OF ACTION

12 PIONEER FINANCIAL CORPORATION

13 AUDIT EXAMINATION

14 5.

15 On July 17, 2008, the Department completed an audit
16 examination of the books and records of PIONEER pertaining to the
17 mortgage and loan activities described in Paragraph 4A, which
18 require a real estate license. The audit examination covered a
19 period of time beginning on May 1, 2006 to April 30, 2008. The
20 audit examination revealed violations of the Code and the
21 Regulations as set forth in the following paragraphs, and more
22 fully discussed in Audit Report LA 070203 and the exhibits and
23 work papers attached to said audit report.
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PIONEER FINANCIAL CORPORATION

TRUST ACCOUNT

6.

During the audit period PIONEER did not maintain a trust account pertaining to its mortgage loan activity.

VIOLATIONS OF THE REAL ESTATE LAW

7.

In the course of activities described in Paragraph 4A, above, and during the examination period described in Paragraph 5, Respondents PIONEER and HU, acted in violation of the Code and the Regulations in that they:

(a) Failed to disclose yield spread premiums from lenders on the approved Mortgage Loan Disclosure Statement for the borrowers Wu, Chen, Lam/Trieu, McElroy, Bizarron and Botello/Avevalo in amount of \$12,677.85, in violation of Code Section 10240 and Regulation 2840; and

(b) Used the fictitious name of "Pioneer Financial Company", to conduct licensed activities including mortgage loans without holding a license bearing said fictitious business name, in violation of Code Section 10159.5 and Regulation 2731.

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DISCIPLINE STATUTES AND REGULATIONS

8.

The conduct of Respondents PIONEER and HU described in Paragraph 7, above, violated the Code and the Regulations as set forth below:

<u>PARAGRAPH</u>	<u>PROVISIONS VIOLATED</u>
7(a)	Code Section 10240 and Regulation 2840
7(b)	Code Section 10159.5 and Regulation 2731

The foregoing violations constitutes cause for the suspension or revocation of the real estate license and license rights of PIONEER and HU, under the provisions of Code Sections 10177(d) for violation of the Real Estate Law and/or 10177(g) for negligence.

SECOND CAUSE OF ACTION

RM CER CORPORATION

AUDIT EXAMINATION

9.

On June 30, 2008, the Department completed an audit examination of the books and records of PIONEER pertaining to the mortgage and loan activities described in Paragraph 4, which require a real estate license. The audit examination covered a period of time beginning on May 1, 2006 to April 30, 2008. The

1 audit examination revealed violations of the Code and the
2 Regulations as set forth in the following paragraphs, and more
3 fully discussed in Audit Report LA 070204 and the exhibits and
4 work papers attached to said audit report.

5 PIONEER FINANCIAL CORPORATION

6 TRUST ACCOUNT

7 10.

8 During the audit period PIONEER did not maintain a
9 trust account pertaining to its residential resale activity.

10 VIOLATIONS OF THE REAL ESTATE LAW

11 11.

12 In the course of activities described in Paragraph 4B,
13 above, and during the examination period described in Paragraph
14 9, Respondents RMCER and HU, acted in violation of the Code and
15 the Regulations in that they:

16 (a) Misrepresented to sellers Lopez, Cayabyab, Wu,
17 Ojeda and Ibarra that RMCER held a earnest money deposits from
18 buyers in total amount of \$36,100, in violation of Section
19 10176(a) and/or 10177(g); and

20 (b) Failed to place trust funds, including earnest
21 money deposits, accepted on behalf of another into the hands of
22 the owner of the funds, a neutral escrow depository or into a
23 trust fund account in the name of the trustee at a bank or other
24 financial institution not later than three business days
25 following receipt of the funds by the broker or by the broker's
26
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1 salesperson, as required by Code Section 10145 and Regulation
2 2832(d).

3 DISCIPLINE STATUTES AND REGULATIONS

4 12.

5 The conduct of Respondents RMCER and HU described in
6 Paragraph 7, above, violated the Code and the Regulations as set
7 forth below:

8 <u>PARAGRAPH</u>	<u>PROVISIONS VIOLATED</u>
9 11(a)	Code Sections 10176(a) and 10177(g)
10	
11	
12 11(b)	Code Section 10145 and Regulation
13	2732(d)
14	

15 The foregoing violations constitutes cause for the suspension or
16 revocation of the real estate license and license rights of RMCER
17 and HU, under the provisions of Code Sections 10177(d) for
18 violation of the Real Estate Law and/or 10177(g) for negligence.

19 THIRD OF ACTION

20 NEGLIGENCE

21 13.

22 The overall conduct of Respondents PIONEER, RMCER and
23 HU constitutes negligence or incompetence. This conduct and
24 violation are cause for the suspension or revocation of the real
25 estate license and license rights of said Respondents pursuant to
26 the provisions of Code Section 10177(g).
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SUPERVISION AND COMPLIANCE

14.

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3 The overall conduct of Respondent HU constitutes a
4 failure on her part, as officer designated by a corporate broker
5 licensee, to exercise the reasonable supervision and control over
6 the licensed activities of PIONEER and RMCER as required by Code
7 Section 10159.2, and to keep PIONEER and RMCER in compliance with
8 the Real Estate Law, and is cause for the suspension or
9 revocation of the real estate license and license rights of HU
10 pursuant to the provisions of Code Section 10177(h).

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1 WHEREFORE, Complainant prays that a hearing be
2 conducted on the allegations of this Accusation and that upon
3 proof thereof, a decision be rendered imposing disciplinary
4 action against the license and license rights of Respondents
5 PIONEER FINANCIAL CORPORATION, RMCER CORPORATION, and GRACE C.
6 HU, under the Real Estate Law (Part 1 of Division 4 of the
7 Business and Professions Code) and for such other and further
8 relief as may be proper under other applicable provisions of law.

9 Dated at Los Angeles, California

10 this

21 day of August 2008

Robin Trujillo

Deputy Real Estate Commissioner

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23 cc: Pioneer Financial Corporation
24 RMCER Corporation
25 c/o Grace C. Hu D.O.
26 Robin Trujillo
27 Sacto
Audits - Dorcas Cheng