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1 AMELIA V. VETRONE, Counsel (SBN# 134612)
2 Department of Real Estate
3 320 West Fourth St. #350
4 Los Angeles, CA 90013
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DEPARTMENT OF REAL ESTATE
BY: *[Signature]*

(213) 576-6982
(213) 576-6940 (Direct)

BEFORE THE DEPARTMENT OF REAL ESTATE
STATE OF CALIFORNIA

* * *

In the Matter of the Accusation of) No. H-37540 LA
)
SOLUTION ONE FINANCIAL INC.;) A C C U S A T I O N
JEFF BARTON, individually and)
as former designated officer)
of Solution One Financial Inc.;)
and JERRY ALLEN JONES,)
)
)
)
Respondents.)

The Complainant, Robin Trujillo, a Deputy Real Estate
Commissioner, for cause of Accusation against SOLUTION ONE
FINANCIAL INC.; JEFF BARTON, individually and as former
designated officer of Solution One Financial Inc.; and JERRY
ALLEN JONES is informed and alleges as follows:

1.

The Complainant, Robin Trujillo, a Deputy Real Estate
Commissioner of the State of California, makes this Accusation in
her official capacity.

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1 2.

2 Respondent SOLUTION ONE FINANCIAL INC. ("SOFI") is a
3 California corporation. Respondent JERRY ALLEN JONES is the
4 President of SOFI. The corporate status of SOFI is currently
5 stated as "suspended" according to the California Secretary of
6 State.

7 3.

8 Respondent SOFI is licensed by the Department of Real
9 Estate ("Department") as a corporate real estate broker. SOFI
10 was originally licensed by the Department on March 11, 2006, and
11 expired March 10, 2010. Pursuant to Code Section 10201,
12 Respondent has a two-year right of renewal. Pursuant to Code
13 Section 10103, the Department of Real Estate retains
14 jurisdiction. Respondent JEFF BARTON was the broker-officer
15 designated pursuant to Business and Professions Code ("Code")
16 Section 10159.2 to be responsible for ensuring SOFI's compliance
17 with the Real Estate Law until the corporation's license expired
18 on March 10, 2010.

19 4.

20 Respondent JEFF BARTON ("BARTON") is licensed by the
21 Department as a real estate broker. BARTON was originally
22 licensed by the Department as a broker on September 6, 2000.
23 Between March 11, 2006 and March 10, 2010, Respondent BARTON was
24 the designated broker-officer of SOFI. BARTON's main office
25 address of record with the Department is 6901 Topanga Canyon
26 Blvd., Suite 205, Canoga Park, CA 91303. From March 7, 2006, to
27 the present, BARTON's main office address of record with the

1 Department has been 6901 Topanga Canyon Blvd., Suite 205, Canoga
2 Park, CA 91303. SOFI's main office address with the Department
3 from June 2, 2007, to March 10, 2010, was 23890 Copper Hill
4 Drive, #227, Valencia, CA 91354. At all times herein relevant,
5 BARTON has been the Vice President of SOFI.

6 5.

7 Respondent JERRY ALLEN JONES, ("JONES"), is licensed by
8 the Department as a restricted real estate salesperson. JONES
9 was originally licensed by the Department on April 14, 2007, and
10 his license expires August 23, 2013. Respondent BARTON was
11 JONES's employing broker from May 24, 2007, to September 13,
12 2009. Since September 13, 2009, JONES has not been affiliated
13 with any broker.

14 6.

15 Respondent JONES is the President, and Treasurer of
16 SOFI. JONES's address of record with the Department is 27548
17 Sunny Creek Drive, Valencia, CA 91354.

18 7.

19 At all times relevant herein, Respondents engaged in
20 the business of, acted in the capacity of, advertised or assumed
21 to act as real estate brokers in the State of California within
22 the meaning of Code Sections 10131(d) and 10131.2. Their
23 activities included soliciting borrowers or lenders for and/or
24 negotiating loans, collecting payments and/or performing services
25 for borrowers or lenders in connection with loans secured by lien
26 on real property. Their activities also included claiming,
27 demanding, charging, receiving, collecting or contracting for the

1 collection of advance fees within the meaning of Code Sections
2 10026 and 10085.

3 FIRST CAUSE OF ACCUSATION

4 (Advance Fee Violations)

5 8.

6 At all times herein relevant, Respondents solicited,
7 advertised and collected advance fees from mortgage loan clients
8 in connection with loan modification services. At no time have
9 Respondents ever submitted any advance fee agreements or other
10 materials to the Department for review and approval as required
11 by Code Section 10085 and Regulation 2970 of Title 10, Chapter 6,
12 California Code of Regulations ("Regulation").

13 9.

14 On or about October 4, 2008, Respondent JONES
15 solicited, and collected an advance fee of \$2995 for loan
16 modification services from homeowner and borrower Amy Calderon
17 ("Calderon") which services included adjustments to the terms and
18 conditions of her home loans including, but not limited to,
19 repayment plans, forbearance plans, partial claims, and reduction
20 in principal or interest, extenuations, and/or foreclosure
21 prevention.

22 10.

23 Respondents failed to obtain any loan modification for
24 Calderon, failed to refund any portion of the advance fee
25 collected, and has since refused to communicate with Calderon.

26 11.

27 The conduct, acts and omissions of Respondents as set

1 forth above, are cause for the suspension or revocation of the
2 licenses and license rights of Respondents pursuant to Code
3 Sections 10176(a), 10176(b), 10176(i), 10177(d), and/or 10177(g).

4 SECOND CAUSE OF ACCUSATION

5 (Failure to Supervise)

6 12.

7 Based on the conduct alleged in paragraphs 8, 9, and
8 10, above, Respondent BARTON failed to exercise reasonable
9 supervision over the activities of his corporation and his
10 employee JONES, to ensure compliance with the Real Estate Law and
11 the Commissioner's Regulations in violation of Code Section
12 10159.2 and Regulation 2725.

13 13.

14 The conduct, acts and omissions of Respondent BARTON as
15 set forth in paragraph 12, above, are cause for the suspension or
16 revocation of the licenses and license rights of Respondent
17 BARTON pursuant to Code Sections 10177(d), 10177(g), and/or
18 10177(h).

19 14.

20 Respondents' activities constitute a course of conduct
21 which includes the homeowner-borrowers alleged above by way of
22 example, but is by no means limited to that named consumer and
23 her real property.

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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 all licenses and/or license rights of Respondents
5 SOLUTION ONE FINANCIAL INC.; JEFF BARTON, individually and as
6 former designated officer of Solution One Financial Inc.; and
7 JERRY ALLEN JONES under the Real Estate Law and for such other
8 and further relief as may be proper under other applicable
9 provisions of law, including restitution of advanced fees paid
10 for loan modifications.

11 Dated at Los Angeles, California, August 1, 2011.

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14 _____
15 Robin Trujillo
16 Deputy Real Estate Commissioner
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24 cc: Solution One Financial Inc.
25 Jeff Barton
26 Jeffrey Allen Jones
27 Robin Trujillo
 Sacto.