

FILED

JAN 16 2013

DEPARTMENT OF REAL ESTATE
BY: James B. Don

BEFORE THE DEPARTMENT OF REAL ESTATE

STATE OF CALIFORNIA

* * * *

In the Matter of the Accusation of)	No. H-37654 LA
)	
HOME RESCUE PROGRAMS INC., a)	<u>DEFAULT DECISION</u>
corporate real estate broker;)	
SUSAN AMY HERMAN,)	(CYNTHIA LYNN CROCKETT)
individually and as former designated)	
officer of Home Rescue Programs Inc.;)	
ANA SAMAYOA POSADAS;)	
GINA MARIE ALCANTAR; and)	
<u>CYNTHIA LYNN CROCKETT,</u>)	
)	
Respondents.)	

DECISION

This Decision is being issued in accordance with the provisions of Section 11520 of the Government Code, on evidence of compliance with Section 11505 of the Government Code and pursuant to the Order of Default filed on October 15, 2012, and the findings of fact set forth herein are based on one or more of the following: (1) Respondent's express admissions; (2) affidavits; and (3) other evidence.

FINDINGS OF FACT

Default

1. On November 4, 2011, Robin Trujillo made the Accusation in her official capacity as a Deputy Real Estate Commissioner of the Department of Real Estate, State of California ("Department").

(a) On November 9, 2011, the Accusation, Statement to Respondent, and Notice of Defense were mailed, by certified mail, return receipt requested, to Respondent CYNTHIA LYNN CROCKETT at her mailing address on record with the Department at P.O. Box 3823, Beverly Hills, CA 90212. This mailing was signed for on November 28, 2011.

(b) No Notice of Defense was received from Respondent CYNTHIA LYNN CROCKETT.

(c) No Notice of Defense having been received from Respondent CYNTHIA LYNN CROCKETT, her default was entered on October 15, 2012.

Parties and Entities

2. Home Rescue Programs Inc. ("Home Rescue") is a California corporation. At all times relevant herein, Brian Suder was and is the President of Home Rescue, and Steven Duplain was Chief Financial Officer.

3. Home Rescue is licensed and has license rights as a corporate real estate broker under the Real Estate Law, Part 1 of Division 4 of the Business and Professions Code ("the Code"). HOME RESCUE was first licensed by the Department of Real Estate of the State of California ("Department") on January 26, 2009. Beginning on January 26, 2009, and continuing through November 25, 2009, Susan Amy Herman was the broker-officer designated pursuant to Code Section 10159.2 to be responsible for ensuring Home Rescue's compliance with the Real Estate Law. Herman cancelled her designated broker status on or about November 25, 2009. Since November 25, 2009, Home Rescue has not been broker affiliated, and its license has therefore been inactive since that time.

4. Respondent CYNTHIA LYNN CROCKETT ("CROCKETT") was at all times relevant herein licensed by the Department as a real estate salesperson, or had rights with respect to said license. Respondent CROCKETT was first licensed by the Department on or about October 12, 2007. She was licensed to conduct real estate business as an employee of Chrismar Financial Inc. (October 12, 2007-April 12, 2009); LT Realty Services (July 6, 2009 – January 30, 2011); and The Pitts Group Inc. (January 31, 2011 to October 11, 2011). CROCKETT's real estate license expired on October 11, 2011. She retains renewal rights and the Department retains jurisdiction pursuant to Code Section 10103.

5. The parties and entities listed above have also engaged in real estate activities under numerous other business names, including, but not limited to, the following unlicensed business names:

- (a) www.hrpapply.com
- (b) Home Rescue Programs
- (c) Home Rescue Programs LLC

6. At all times relevant herein, Respondent CROCKETT and Home Rescue engaged in the business of, acted in the capacity of, advertised or assumed to act as a real estate broker in the State of California within the meaning of Code Sections 10131(d) and 10131.2. CROCKETT and Home Rescue's activities included soliciting borrowers or lenders for and/or negotiating loans, collecting payments and/or performing services for borrowers or lenders in connection with loans secured by liens on real property. CROCKETT and Home Rescue's activities also included claiming, demanding, charging, receiving, collecting or contracting for the collection of advance fees within the meaning of Code Sections 10026 and 10085.

7. Respondent CROCKETT has never been licensed by the Department as a broker or as a salesperson employed by Home Rescue as her supervising broker of record.

8. Beginning on or about February 25, 2009, and continuing through on or after December 1, 2009, Respondent CROCKETT solicited borrowers for loan modification services and collected advance fees as an agent and/or affiliate of Home Rescue. CROCKETT, as an agent of Home Rescue, purported to represent consumers in negotiating with lenders on their behalves to modify the terms of their mortgage loans. Examples of loan modification consumers who dealt with CROCKETT as an agent of Home Rescue include, but are not limited to Jose E. and Ben and Crystal S.

9. During the time period set forth above, CROCKETT engaged in activities requiring a real estate salesperson license for or in expectation of compensation from Home Rescue when Home Rescue was not her supervising broker of record. CROCKETT was not employed by Home Rescue or authorized to conduct licensed activities under Home Rescue's license.

DETERMINATION OF ISSUES

1. Evidence considered in this matter included the sworn statements and complaints of consumers; written statements of witnesses; public records pertaining to the corporate status of Home Rescue, as well as licensing records from the Department; the audit report; bank records; and loan modification records provided to the Department during the course of the audit.

2. The standard of proof applied was clear and convincing proof to a reasonable certainty.

3. CROCKETT's conduct, as set forth in the Findings of Fact above, in soliciting borrowers, collecting advance fees and negotiating loan modifications as an agent of Home Rescue, and accepting compensation from any person other than the broker under whom she was then licensed, constitutes grounds to revoke or suspend CROCKETT's real estate salesperson license and license rights pursuant to Code Sections 10137, 10177(d), and 10176(i).

ORDER

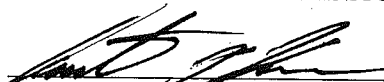
All licenses and license rights of Respondent CYNTHIA LYNN CROCKETT under the provisions of Part I of Division 4 of the Business and Professions Code are revoked.

This Decision shall become effective at 12 o'clock noon on FEB - 5 2013.

DATED: 1/14/13

REAL ESTATE COMMISSIONER

By:



Awet P. Kidane

Chief Deputy Commissioner

FILED

JAN 18 2013

DEPARTMENT OF REAL ESTATE
BY: Jama B. Cron

BEFORE THE DEPARTMENT OF REAL ESTATE
STATE OF CALIFORNIA

In the Matter of the Accusation of)	No. H-37654 LA
)	
<u>HOME RESCUE PROGRAMS INC.</u> , a)	<u>DEFAULT DECISION</u>
corporate real estate broker;)	
SUSAN AMY HERMAN,)	(HOME RESCUE
individually and as former designated)	PROGRAMS INC.)
officer of Home Rescue Programs Inc.;)	
ANA SAMAYOA POSADAS;)	
GINA MARIE ALCANTAR; and)	
CYNTHIA LYNN CROCKETT,)	
)	
Respondent.)	
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DECISION

This Decision is being issued in accordance with the provisions of Section 11520 of the Government Code, on evidence of compliance with Section 11505 of the Government Code and pursuant to the Order of Default filed on October 15, 2012, and the findings of fact set forth herein are based on one or more of the following: (1) Respondent's express admissions; (2) affidavits; and (3) other evidence.

FINDINGS OF FACT

Default

1. On November 4, 2011, Robin Trujillo made the Accusation in her official capacity as a Deputy Real Estate Commissioner of the Department of Real Estate, State of California ("Department").

(a) On November 9, 2011, the Accusation, Statement to Respondent, and Notice of Defense were mailed, by certified mail, return receipt requested, to Respondent HOME RESCUE PROGRAMS INC. at its mailing address on record with the Department at 13428 Maxella Ave, Suite 326, Marina Del Rey, California 90292. This mailing was

returned by the post office marked, "Undeliverable commercial mail receiving agency. No authorization to receive mail for this customer."

(b) No Notice of Defense was received from Respondent HOME RESCUE PROGRAMS INC.

(c) No Notice of Defense having been received, Respondent HOME RESCUE PROGRAMS INC.'s default was entered on October 15, 2012¹.

Parties and Entities

2. Respondent HOME RESCUE PROGRAMS INC. ("HOME RESCUE") is a California corporation. At all times relevant herein, Brian Suder was and is the President of HOME RESCUE, and Steven Duplain was Chief Financial Officer.

3. Respondent HOME RESCUE is licensed and/or has license rights as a corporate real estate broker under the Real Estate Law, Part 1 of Division 4 of the Business and Professions Code ("the Code"). HOME RESCUE was first licensed by the Department of Real Estate of the State of California ("Department") on January 26, 2009.

(a) Prior to January 26, 2009, HOME RESCUE was not licensed by the Department in any capacity.

(b) Beginning on January 26, 2009, and continuing through November 25, 2009, Susan Amy Herman was the broker-officer designated pursuant to Code Section 10159.2 to be responsible for ensuring HOME RESCUE's compliance with the Real Estate Law. Herman cancelled her designated broker status on or about November 25, 2009.

(c) Since November 25, 2009, HOME RESCUE has not been broker affiliated, and its license has therefore been inactive since that time.

(d) Effective March 26, 2012, Susan Amy Herman voluntarily surrendered her real estate license.

4. Brian Suder ("Suder") is not currently licensed by the Department in any capacity, and does not have any license rights. Suder has never been licensed as a broker. Suder was licensed by the Department as a conditional restricted salesperson between September 2, 2005 and March 2, 2007. On March 3, 2007, Suder's conditional restricted salesperson license was permanently suspended due to his failure to complete education requirements.

5. Steven Duplain ("Duplain") is not now and has never been licensed by the Department in any capacity. At times relevant herein, Duplain was an officer and agent for service of process

¹ Former designated broker-officer of HOME RESCUE PROGRAMS INC., Susan Herman, filed a Notice of Defense on her own behalf. At the time that she filed her Notice of Defense, she was no longer the designated broker-officer of HOME RESCUE PROGRAMS INC. Herman voluntarily surrendered her license.

for Respondent HOME RESCUE. At times relevant herein, Duplain was also a managing partner of Home Rescue Programs LLC.

6. Home Rescue Programs LLC is a California Limited Liability company. At all times relevant herein, Brian Suder and Steven Duplain were and are managing partners of Home Rescue Programs LLC. Home Rescue Programs LLC has never been licensed by the Department in any capacity.

7. The parties and entities listed above have also engaged in real estate activities under numerous other business names, including, but not limited to, the following unlicensed business names:

- (a) www.hrpapply.com
- (b) Home Rescue Programs
- (c) Home Rescue Programs LLC

8. At all times relevant herein, Respondent HOME RESCUE engaged in the business of, acted in the capacity of, advertised or assumed to act as a real estate broker in the State of California within the meaning of Code Sections 10131(d) and 10131.2. HOME RESCUE's activities included soliciting borrowers or lenders for and/or negotiating loans, collecting payments and/or performing services for borrowers or lenders in connection with loans secured by liens on real property. HOME RESCUE's activities also included claiming, demanding, charging, receiving, collecting or contracting for the collection of advance fees within the meaning of Code Sections 10026 and 10085.

Audit Violations (DRE Audit No. LA 090111)

9. On April 26, 2010, the Department completed an audit examination of HOME RESCUE's books and records pertaining to the mortgage lending activities described in Finding No. 8 above, covering a period from December 18, 2008 to November 24, 2009. The primary purpose of the examination was to determine HOME RESCUE's compliance with the Real Estate Law. The examination, Audit No. LA 090111, revealed violations of the Code and Title 10, Chapter 6 of the California Code of Regulations ("Regulations"), as set forth below, and as more specifically set forth in the Audit Report and Exhibits attached thereto.

10. During the examination period HOME RESCUE, through its agents and employees, deposited and/or disbursed funds, including trust funds, into and/or from the following general business accounts:

(a). Bank Account 1: Account number xxxxx-x2839 ("B/A1"), was named, "Steven Duplain, Home Rescue Programs Inc." B/A1 was maintained at Bank of America, 4754 Admiralty Way, Marina Del Rey, CA 90292. This account was maintained for the receipt and disbursement of trust funds in the form of advance fees received in connection with HOME RESCUE's loan modification business. Duplain was the only signatory on the account, and only one signature was required. B/A1 was not identified as a trust account.

(b). Bank Account 2: Account number xxxxx-x1664 (“B/A2”) was named “Home Rescue Programs LLC.” B/A2 was maintained at the Bank of America, 4754 Admiralty Way, Marina Del Rey, CA 90292. This account was maintained as HOME RESCUE’s general operating account, and was also used for the receipt and disbursement of advance fees collected in connection with HOME RESCUE’s loan modification activity. Duplain and Suder were signatories on the account, and only one signature was required. B/A2 was not identified as a trust account.

11. In the course of activities described in Finding 8 above, and during the examination period described in Finding No. 9, Respondent HOME RESCUE acted in violation of the Code and the Regulations in that:

(a) HOME RESCUE placed trust funds, in the form of advance fees, into general bank accounts and did not maintain a trust account for the advance fees, in violation of Code Sections 10145 and 10146 and Regulation 2832.

(b) HOME RESCUE allowed the balance of the trust funds placed in the general bank accounts to fall below the total aggregate trust fund liability to the owners of the trust funds, in violation of Code Section 10145 and Regulation 2932.1.

(i) Based on records provided to the Department during the audit, as of the audit cut-off date of November 24, 2009, B/A1 had a minimum shortage of approximately \$1,643,767.18.

(ii) As of November 24, 2009, B/A2 had a minimum shortage of approximately \$84,268.27.

(iii) There was no evidence that Respondent obtained the written consent of the beneficiary/owners of the trust funds to allow the account balances to fall below the aggregate liability.

(c) Respondent collected advance fees from borrowers pursuant to an agreement which was not authorized by the Department, in violation of Code Section 10085 and Regulation 2970.

(i) Respondent collected advance fees from borrowers prior to submitting an advance fee agreement and materials to the Department for review and approval on March 20, 2009.

(ii) After receiving a “No Objection Letter” from the Department relating to a proposed advance fee agreement and materials on March 20, 2009, Respondent did not use the advance fee agreement and accounting format as submitted.

(d) HOME RESCUE collected trust funds, in the form of advance fees, on behalf of borrowers, which trust funds were deposited into general accounts, and commingled with general funds, in violation of Code Sections 10145, 10176(e) and Regulation 2832.

(i) Between February 14, 2009 and November 24, 2009, HOME RESCUE collected advance fees totaling \$2,227,314.33 from borrowers, which funds were deposited into B/A1, an account not designated as a trust account.

(ii) Between February 14, 2009 and November 24, 2009, HOME RESCUE deposited advance fees totaling \$94,885.00 into B/A2, and commingled those trust funds with HOME RESCUE's general funds.

(e) HOME RESCUE deposited trust funds into general accounts, then disbursed funds from the accounts and converted them to personal use, and/or allowed others to convert them to personal use, and account balances were reduced below the amount of trust funds deposited, in violation of Code Sections 10145, 10176(i) and/or 10177(j).

(i) Based on a review of the records HOME RESCUE provided during the audit, there was no evidence maintained in the files regarding the completion of the loan modification transactions.

(ii) Of the advance fees collected and deposited into B/A1 during the audit period, \$1,643,696.14 were disbursed to HOME RESCUE prior to completion of services, and deposited into B/A 2, HOME RESCUE's general account out of which operating expenses and personal disbursements were made. \$26,840.00 was disbursed to another account ending in "1508," for which further records were not provided during the audit.

(f) Respondent received advance fees from borrowers without maintaining and providing an accounting identifying the name of the agent, name of the principal, services to be rendered, identity of the trust fund account into which the advance fees were deposited, the amount of the fee collected, and the allocation of money disbursed from the advance fee to cover services, commission and overhead. This was in violation of Code Section 10146 and Regulation 2972.

(g) Between December 18, 2008 and November 24, 2009, HOME RESCUE negotiated approximately 2000 loan modification transactions and collected fees in advance ranging from \$1,000.00 to \$5,599.00 per transaction. HOME RESCUE did not maintain a columnar record of receipts and disbursements of these trust funds received on behalf of borrowers, in violation of Code Section 10145 and Regulation 2831.

(h) HOME RESCUE did not maintain complete and accurate separate records for each beneficiary or transaction in which advance fees were collected for loan modification services. HOME RESCUE's records for trust funds placed in B/A1 and B/A2 did not include dates of receipts, amounts of deposits, and amounts of disbursements. This was in violation of Code Section 10145 and Regulation 2831.1.

(i) HOME RESCUE did not maintain monthly reconciliations of all separate records to the columnar records of receipts and disbursements for the bank accounts that handled advance fees, in violation of Code Section 10145 and Regulation 2831.2.

(j) HOME RESCUE's president, Steven Duplain, was not licensed by the Department and was the sole signatory on B/A 1. He was authorized to sign and make withdrawals on B/A 1 without fidelity bond coverage, in violation of Code Section 10145 and Regulation 2834.

(k) HOME RESCUE conducted mortgage loan activities using the fictitious business names "Home Rescue Programs," and "Home Rescue Programs LLC" without first obtaining a license from the Department bearing such fictitious names, in violation of Code Section 10159.5 and Regulation 2731.

(l) Between October 11, 2009 and November 24, 2009, HOME RESCUE continued to collect advance fees for loan modification services, in violation of Code Sections 10085.6, 10146 and 10145, and Regulation 2832.

(m) HOME RESCUE performed activities requiring a real estate license prior to licensure by the Department. As examples, between December 22, 2008 and January 20, 2009, HOME RESCUE solicited borrowers, offered loan modification services and collected advance fees from borrowers Jane T., Toni M., Oscar A. and Rickey G.. This was in violation of Code Section 10130.

(n) HOME RESCUE employed unlicensed agents Infinity Financial Alliance, Carolina Crooks, John Boatman, Derek Forest, DLN Financials, Carmen Kovac, Richard Pavlick and Brian Hollifield to perform activities requiring a real estate license when none of these agents was properly licensed by the Department, in violation of Code Section 10137.

(o) HOME RESCUE failed to notify the Department of the employment of all salespersons performing licensed activities under its name, including salespersons Ana Posadas, Leslie Thulin and Juan Ferrer, and failed to make available for inspection written Broker/Salesperson agreements with these salespersons. This was in violation of Code Section 10161.8 and Regulations 2726 and 2752.

(p) HOME RESCUE failed to maintain copies of all trust fund records relating to the fees collected for loan modifications, in violation of Code Section 10148.

Unlawful Compensation of Salesperson Affiliates and Unlicensed Agents

12. Between January 26, 2009 and November 24, 2009, HOME RESCUE negotiated approximately 2000 loan modification transactions and collected advance fees totaling approximately \$2,326,949.33.

13. Respondent HOME RESCUE routinely compensated individuals to perform activities requiring a real estate license who were not licensed by the Department in any capacity and/or who were licensed as salespersons employed by brokers other than HOME RESCUE. These unlicensed individuals, and salespersons licensed under the employ of brokers other than HOME RESCUE, advertised, solicited and collected advance fees, and/or performed loan on services on behalf of HOME RESCUE.

14. Respondent compensated real estate salespersons Ana S. Posadas ("Posadas"), Gina M. Alcantar ("Alcantar"), and Cynthia Lynn Crockett ("Crockett"), among others, to perform loan modification activities as agents or affiliates of HOME RESCUE at times when these salespersons were licensed under the employ of other supervising brokers. Examples include, but are not limited to the following:

(a) Examples of individuals from whom Posadas collected advance fees on behalf of HOME RESCUE for loan modification services include Rebecca H. (\$4400, Jimmy M. (\$1,500, and Louis P. (\$5,990).

(b) Examples of individuals from whom Alcantar collected advance fees on behalf of HOME RESCUE include Maria M. (\$3,750); Ramiro M. (\$1,500, and Montano M. (\$3,750).

(c) Examples of individuals from whom Crockett solicited advance fees and provided loan modification services on behalf of HOME RESCUE include Ben S. (\$1,995) and Jose E. (\$3,750).

15. HOME RESCUE and designated officer HERMAN failed to maintain records indicating whether or not loan modification services were provided or loan modifications were obtained on behalf of the borrowers listed in Findings of Fact 14 A, B and C.

Misleading, False and/or Deceptive Advertising

16. Between on or before August 31, 2009 and continuing through on or after November 4, 2009, Respondent HOME RESCUE, also doing business under the unlicensed fictitious business name www.hrpapply.com, knowingly advertised, printed, displayed, published, distributed or caused or permitted to be advertised, printed, displayed, published distributed, false, misleading or deceptive statements or representations with regard to the rates, terms or conditions for making, purchasing or negotiating loans on real property. HOME RESCUE did so in order to induce consumers to pay up front, advance fees to engage HOME RESCUE to provide loss mitigation services.

17. Beginning on or before August 9, 2009, HOME RESCUE, doing business as www.hrp.com, circulated advertisements soliciting consumers through the U.S. Postal service, which mail solicitations contained deceptive, misleading and materially false representations which HOME RESCUE knew, or should have known, were false. These mail solicitations entitled, "Lender Investigation Notification," urged homeowners who were borrowers under residential mortgage loans to contact HOME RESCUE to participate in a lawsuit against lenders that would entitle them to a reduction of the principal amount of their loan, lower their interest rates, and eliminate or reduce delinquent amounts.

18. Between August 8, 2009 and December 28, 2009, the Department received samples of mail solicitations sent to consumers of loans issued by Sun America Mortgage, Citibank, and Nevada State Bank, which solicitations were deceptive, misleading or false in the following ways:

(a) The solicitations were formatted and presented in a manner suggesting they were from a governmental agency, when they were not.

(b) The solicitations did not clearly and conspicuously state that the solicitor was not sponsored or affiliated with the lender and that the solicitation was not authorized by the lender.

(c) The solicitations did not clearly identify HOME RESCUE and were deceptively structured as if they were official legal documents and not a solicitation.

(d) The solicitations falsely notified the consumers that their lenders were under investigation for predatory lending practices.

(e) The offers enumerated a number of benefits to the consumer, implying a guarantee of outcomes which the solicitor was unable to guarantee.

(f) The solicitation referred consumers to a HOME RESCUE website which used quotes from then FDIC Chairman Sheila Baird and California Governor Arnold Schwarzenegger implying government support for their services.

DETERMINATION OF ISSUES

1. Evidence considered in this matter included the sworn statements and complaints of consumers; written statements of witnesses; public records pertaining to the corporate status of HOME RESCUE, as well as licensing records from the Department; the audit report; bank records; and loan modification records provided to the Department during the course of the audit.

2. The standard of proof applied was clear and convincing proof to a reasonable certainty.

Audit Violations

3. Grounds exist to revoke or suspend the corporate real estate broker license and license rights of Respondent HOME RESCUE PROGRAMS INC. pursuant to Code Sections 10177(d) and 10176(i) for collecting advance fees from prospective borrowers pursuant to a written fee agreement, which agreement was not submitted to the Department for review prior to use, in violation of Code Section 10085 and Regulation 2970.

4. Grounds exist to revoke or suspend the corporate real estate broker license and license rights of Respondent HOME RESCUE PROGRAMS INC. pursuant to Code Sections 10130 and 10137 for engaging in activities requiring a real estate broker license when it was not licensed as a real estate broker, and when it was not operating through a broker-officer designated pursuant to Code Section 10159.2 to be responsible for supervising the activities of the corporations employees and agents to ensure compliance with the Real Estate Law.

5. Grounds exist to revoke or suspend the corporate real estate broker license and license rights of Respondent HOME RESCUE PROGRAMS INC. pursuant to Code Sections 10177(d),

10176(e), 10176(i), 10177(j), 10137, 10085, and 10085.6 for violating Code Sections 10145, 10146, 10130, 10137, 10159.5, 10161.8 and 10148, and Regulations 2726, 2731, 2752, 2831, 2831.1, 2831.2, 2832, 2832.1, 2834, 2970, and 2972.

Advance Fee Violations, Unlicensed Agents, and Unlawful Compensation of Salesperson Affiliates

6. Grounds exist to revoke or suspend the corporate real estate broker license and license rights of Respondent HOME RESCUE PROGRAMS INC. pursuant to Code Sections 10137, 10177(d) and 10176(i) for employing and compensating unlicensed agents and affiliates who were either not licensed to conduct real estate activities, or who were licensed as employees of other supervising brokers of record to perform acts requiring a real estate license.

Misleading, False and Deceptive Advertising

7. Grounds exist to revoke or suspend the corporate real estate broker license and license rights of Respondent HOME RESCUE PROGRAMS INC. pursuant to Code Sections 10235, 10176(a), 10176(c), 10177(g), 10176(i) and 10177(j) for fraud and dishonest dealing, false advertising, misrepresentation and negligence.

ORDER

All licenses and license rights of Respondent HOME RESCUE PROGRAMS INC. under the provisions of Part I of Division 4 of the Business and Professions Code are revoked.

This Decision shall become effective at 12 o'clock noon on FEB - 5 2013.

DATED: 1/14/13

REAL ESTATE COMMISSIONER

By: 
Awet P. Kidane
Chief Deputy Commissioner