

*Saucho*

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**FILED**

MAR - 9 2010

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 LOAN PROCESSING CENTER INC. doing )  
13 business as Applyloanmod.com, )  
14 iloanmod.com and LPC; and )  
15 MASHEED S. GHAZI, DANNY R. HAYNES )  
16 and LOUIS LEON PACIFIC individually )  
17 and as former designated officers of )  
18 Loan Processing Center Inc. )

No. H-35869 LA

L-2009061123

SECOND AMENDED

ACCUSATION

16 Respondents, )  
17 )  
18 )

19 The First Amended Accusation filed in this matter on  
20 October 1 2009, is amended in its entirety as follows:

21 The Complainant, Neal Shigemitsu, a Deputy Real Estate  
22 Commissioner of the State of California, for cause of Accusation  
23 against LOAN PROCESSING CENTER INC. dba Applyloanmod.com,  
24 iloanmod.com and LPC, MASHEED S. GHAZI, DANNY R. HAYNES and LOUIS  
25 LEON PACIFIC, individually and as former designated officers of  
26 Loan Processing Center Inc., alleges as follows:  
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1.

1           The Complainant, Neal Shigemitsu, acting in her  
2 official capacity as a Deputy Real Estate Commissioner of the  
3 State of California, makes this Accusation against LOAN  
4 PROCESSING CENTER INC. ("LPCI") and MASHEED S. GHAZI ("GHAZI"),  
5 DANNY R. HAYNES ("HAYNES") and LOUIS LEON PACIFIC ("PACIFIC").  
6

7           2.

8           All references to the "Code" are to the California  
9 Business and Professions Code and all references to "Regulations"  
10 are to Title 10, Chapter 6, California Code of Regulations.  
11

12           License History

13           3.

14           a. At all times mentioned, LPCI and GHAZI were  
15 licensed or had license rights issued by the Department of Real  
16 Estate ("Department") as real estate brokers.

17           b. At all times herein mentioned, LPCI was licensed or  
18 had license rights issued by the Department as a real estate  
19 broker. On November 9, 2007, LPCI was originally licensed as a  
20 corporate real estate broker.

21           c. At all times herein mentioned, GHAZI was licensed  
22 or had license rights issued by the Department as a real estate  
23 broker. On October 5, 2006, GHAZI was originally licensed as a  
24 real estate broker. From February 3, 2009 to April 23, 2009,  
25 GHAZI was licensed as the designated officer of LPCI.

26           d. At all times herein mentioned, HAYNES was licensed  
27 or had license rights issued by the Department as a real estate  
broker. On July 30, 2008, HAYNES was originally licensed as a

1 real estate broker. From October 23, 2008 to February 09, 2009,  
2 HAYNES was licensed as the designated officer of LPCI.

3 d. At all times herein mentioned, PACIFIC was licensed  
4 or had license rights issued by the Department as a real estate  
5 broker. On September 26, 1997 to October 23, 2008, PACIFIC was  
6 originally licensed as a real estate broker. From October 23,  
7 2008 to October 23, 2008, PACIFIC was licensed as the designated  
8 officer of LPCI.

9 f. At all times material herein, LPCI was licensed by  
10 the Department as a corporate real estate broker by and through  
11 GHAZI, HAYNES and PACIFIC, excluding Daniel J. Moletz, who is not  
12 a Respondent in this Accusation, as the former, designated  
13 officers and broker responsible, pursuant to Code Sections 10211  
14 and 10159.2 of the Business and Professions Code for supervising  
15 the activities requiring a real estate license conducted on  
16 behalf said corporation's officers, agents and employees,  
17 including GHAZI, HAYNES and PACIFIC.

18 g. LPCI is a corporate real estate broker originally  
19 licensed on November 9, 2007. On April 27, 2009, LPCI became  
20 non-broker affiliated due to the cancellation of GHAZI's status  
21 as designated officer. Shahriar Kolahi aka Shawn Kolahi is the  
22 President and Chief Executive Officer. GHAZI is the Vice  
23 President of LPCI. Maziar Bordbor aka Maziar Bordar, M. Bordbor  
24 and Matt Bordbor, is the Secretary and Chief Executive Officer.

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Designated Officers	From	To
Masheed S. Ghazi	February 03, 2009	April 23, 2009
Danny R. Haynes	October 23, 2008	February 09, 2009
Daniel J. Moltez	February 11, 2009	March 17, 2008
Louis Leon Pacific	November 9, 2007	October 23, 2008

Brokerage

4.

At all times mentioned, in City of Irvine, County of Orange, LPCI, GHAZI, HAYNES and PACIFIC, acted as real estate brokers and conducted licensed activities within the meaning of:

a. Code Section 10131(d). LPCI, GHAZI, HAYNES and PACIFIC engaged in the business of a loan modification and an advanced fee brokerage. Respondents engaged in activities with the public wherein lenders and borrowers were solicited for loans secured directly or collaterally by liens on real property, wherein such loans were arranged, negotiated, processed and consummated on behalf of others for compensation or in expectation of compensation and for fees often collected in advance as well as at the conclusion of transactions; and

b. Code Section 10131.2. LPCI, GHAZI, HAYNES and PACIFIC engaged in the business of a loan modification and an advance fee brokerage dba Applyloanmod.com, iloanmod.com and LPC. Respondents solicited economically distressed homeowner-borrowers

1 seeking adjustments of the terms and conditions of their home  
2 loans, interest and/or principal reduction, foreclosure  
3 abatement, loan restructuring, and/or short sale services, and  
4 offered to negotiate with lenders on behalf of the homeowners for  
5 a fee payable in advance.

6 FIRST CAUSE OF ACTION  
7 (Interim Audit of Loan Modification Activities)

8 5.

9 On April 7, 2009, the Department has completed an  
10 interim audit report of the Department's audit examination of the  
11 books and records of LPCI pertaining to the loan modification  
12 activities and collection of advance fee described in Paragraph 4  
13 that require a real estate license. The interim audit  
14 examination covers a period of time beginning on September 11,  
15 2007 to February 27, 2009. The interim examination revealed  
16 violations of the Code and the Regulations as set forth in the  
17 following Paragraphs, and more fully discussed in Audit Report LA  
18 080168 and the exhibits and work papers attached to said audit  
19 report.

20 Trust Account

21 6.

22 At all times mentioned, in connection with the  
23 activities described in Paragraph 4, above, LPCI accepted or  
24 received funds including funds in trust (hereinafter "trust  
25 funds") from homeowner-borrowers loan modifications handled by  
26 LPCI and thereafter made deposits and/or disbursements of such  
27

1 trust funds. From time to time herein mentioned during the audit  
2 period, trust funds were deposited and/or maintained by LPCI in  
3 the bank account as follows:

4 "Loan Processing Center Inc.  
5 Account No. 29346-03807"  
6 Bank of America (trust account)  
San Francisco, CA 91437-0176

7 Violations - Interim Audit

8 7.

9 In the course of activities described in Paragraphs 4  
10 and 6, above, and during the examination period described in  
11 Paragraph 5, Respondents LPCI, and GHAZI, acted in violation of  
12 the Code and the Regulations in that they:

13 (a) Permitted, allowed or caused the disbursement of  
14 trust funds from the LPCI's trust account used for the deposit of  
15 trust funds, where the disbursement of funds reduced the total of  
16 aggregate funds in LPCI's bank account, to an amount which, on  
17 February 27, 2009, was \$21,331.00, less than the existing  
18 aggregate trust fund liability of LPCI to every principal who was  
19 an owner of said funds, without first obtaining the prior written  
20 consent of the owners of said funds, in violation of Code Section  
21 10145 and Regulation 2832.1; and

22 (b) Placed a false, deceitful and misleading  
23 advertisement on LPCI's website which represented that the  
24 Department of Real Estate conducted an audit on LPCI and  
25 determined that LPCI was in compliance with the Real Estate Laws  
26  
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1 and Regulations. In truth and in fact, the Department's audit  
2 was ongoing and found, as of the audit report date of April 7,  
3 2009 found a substantial trust fund violation, to wit, a  
4 \$21,331.00 shortage in LPCI's bank account used to deposit trust  
5 funds received from homeowner-borrowers, herein mentioned above  
6 and violations of Code Sections 10176(a), 10176(i) and/or  
7 10177(j), 10235 and Regulation 2848.

8 Disciplinary Statutes

9 8.

10 The conduct of Respondents LPCI and GHAZI described in  
11 Paragraph 7, violated the Code and the Regulations as set forth:

12 <u>PARAGRAPH</u>	13 <u>PROVISIONS VIOLATED</u>
14 7(a)	15 Code Section 10145 and Regulation 16 2832.1
17 7(b)	18 Code Sections 10176(a), 10176(i) 19 and/or 10177(j), 10235 and 20 Regulation 2848

21 The foregoing violations constitute cause for the discipline of  
22 the real estate license and license rights of LPCI and GHAZI,  
23 under the provisions of Code Sections 10176(a) for  
24 misrepresentation, 10176(i) and/or 10177(j) for fraud or  
25 dishonest dealing, 10177(d) for willful disregard or violation of  
26 the Real Estate Law, and/or 10177(g) for negligence and 10177(h)  
27 for negligent or lack of supervision of LPCI's brokerage.

SECOND CAUSE OF ACTION  
(Final Audit of Loan Modification Activities)

9.

On April 7, 2009, the Department has completed a final audit of the Department's ongoing audit examination of the books and records of LPCI pertaining to the loan modification activities and collection of advance fee described in Paragraph 4 that require a real estate license. The final audit examination covers a period of time beginning on September 11, 2007 to February 27, 2009. The final audit examination revealed violations of the Code and the Regulations as set forth in the following Paragraphs, and more fully discussed in Audit Report LA 080168 and the exhibits and work papers attached to said audit report.

10.

In the course of activities described in Paragraphs 4 and 6, above, and during the examination period described in Paragraph 9, Respondents LPCI, GHAZI, HAYNES and PACIFIC, acted in violation of the Code and the Regulations in that they:

(a) Permitted, allowed or caused the disbursement of trust funds from the trust fund wherein the disbursement of funds reduced the total of aggregate funds in the trust fund, as set forth below, to an amount which was less than the existing aggregate trust fund liability of LPCI to every homeowner-borrower who was an owner of said funds, without first obtaining the prior written consent of the homeowner-beneficiaries who own



1 said funds, in violation of Code Section 10145 and Regulation  
2 2832.1.

- 3 • \$21,331.00 as of February 27, 2009 (GHAZI)
- 4 • \$14,376.50 as of February 2, 2009 (HAYNES)
- 5 • \$ 6,745.00 as of October 22, 2009 (PACIFIC)

7 (b) (1) (PACIFIC)

8 (i) Fannie/Cornell Scaifes Loan Modification.

9  
10 On June 17, 2008, homeowner-borrowers Fannie/Cornell Scaifes Loan  
11 Modification entered into a Loan Modification Disclosure &  
12 Agreement with Bryco Financial Services (Bryco) to modify their  
13 mortgage loan secured by their home located at 7232 Blue Springs  
14 Way in Citrus Heights, California.

15 (ii) Bryco is an unlicensed company engaged in  
16 the business of providing an analysis of real estate debt, income  
17 and an examination the potential for restructuring and lowering  
18 borrower's general debt and real property-secured debt. Based on  
19 an Affiliate Agreement with LPCI of May 12, 2008, Bryco  
20 transferred the Scaifes loan modification to LPCI.

21 (iii) On July 19, 2008, LPCI, acting as a loan  
22 modification processor, received the loan modification package  
23 from Bryco accompanied by a fee of \$695 from Bryco. On July 2,  
24 2008, Scaifes paid \$2,000 to LPCI. Per the Bryco-LPCI agreement,  
25 Scaifes \$2,000 was supposed to be paid to Bryco. However, Bryco  
26 did not have a merchant bank account to accept credit card  
27

1 payment. Therefore, the \$2,000 credit card payment from Scaifes  
2 was deposited into LPCI's Merchant bank account, not set up for  
3 or designated as a trust fund for the deposit of advance fees  
4 collected from homeowners. LPCI subsequently forwarded the  
5 \$2,000 to Bryco.

6 (iv) LPCI failed to provide the payment records  
7 of Scaifes, including the merchant bank account statement showing  
8 the deposit and trust funds forwarded to Bryco, pursuant to the  
9 Department's request and by subpoena, as set forth below in  
10 Paragraph 10(m)(2), below.

11 (v) LPCI submitted the loan modification to  
12 Scaifes' lender, Downey Savings, by phone. Based on the "Loan  
13 Log Entries", Scaifes' loan modification package was submitted to  
14 the lender, Downey Savings.

15 (vi) On August 7, 2008, Scaifes' loan  
16 modification was denied by Downey Savings due to a \$10,328.22  
17 judgment recorded against Cornell Scaife.

18 (b) (2) (PACIFIC)

19 (i) Patricia Clark (Clark) Loan Modification.  
20 On April 19, 2008, Clark signed a Loan Modification Disclosure &  
21 Agreement and Authorization Form with LPCI to obtain a loan  
22 modification for the mortgage loan secured by her home located at  
23 650 The Village #312 in Redondo Beach, California.  
24

25 (ii) On April 19, 2008, according to Maziar  
26 Bordbor aka Matt Bordbar or M. Bordbar, Secretary and Chief  
27

1 Financial Officer of LPCI, Clark paid \$2,495 with her credit card  
2 to LPCI's merchant account on April 19, 2008.

3 (iii) LPCI did not provide the payment records of  
4 Clark, including the merchant bank account statement showing the  
5 deposit, upon the Department's request and subpoena.

6 (iv) LPCI submitted Clark's loan modification  
7 package to lender Wachovia on April 19, 2008 and resubmitted it  
8 on June 3, 2008, with updated information.

9 (v) According to the Wachovia's Internal Loan  
10 Audit Request maintained in Clark's loan modification file, LPCI  
11 did not provide the employment and compensation records related  
12 to Clark upon the Department's request and subpoena.

13 (vi) On August 5, 2008, LPCI sent a letter to  
14 Clark to notify Clark that her loan modification was denied by  
15 Wachovia.

16 (b) (3) The conduct of PACIFIC, as former designated  
17 officer of LPCI during the submission of the Scaifes and Clark  
18 loan modifications constitutes a violation of 10176(a), 10176(b)  
19 and 10176(i) and/or 10177(g).

20 (c) (GHAZI) Placed a false, deceitful and misleading  
21 advertisement on LPCI's website which represented that the  
22 Department of Real Estate conducted an audit on LPCI and  
23 determined that LPCI was in compliance with the Real Estate Laws  
24 and Regulations. In truth and in fact, the Department's audit  
25 was ongoing and found, as of the interim audit report date of  
26  
27

1 April 7, 2009 found substantial trust fund violations, to wit,  
2 including a \$21,331.00 shortage in LPCI's trust account used to  
3 deposit trust funds received from homeowners, as previously  
4 recited in Paragraph 7(b), in violation of Code Sections  
5 10176(a), 10176(i) and/or 10177(j), 10235 and Regulation 2848.

6 (d) (1) (GHAZI, HAYNES, PACIFIC) Commingled trust funds  
7 and personal funds by depositing trust funds in the form of  
8 collected advance fees into LPCI's general operating account, in  
9 violation of Code Sections 10145 and 10176(e).

10 (d) (2) (GHAZI, HAYNES, PACIFIC) Converted trust funds  
11 and personal funds by depositing trust funds in the form of  
12 collected advance fees into LPCI's general operating account, in  
13 violation of Code Sections 10145 and 10176(i).

14 (e) (GHAZI, HAYNES, PACIFIC) Failed to maintain an  
15 accurate and complete separate record for each beneficiary or  
16 transaction, thereby failing to account for all trust funds in  
17 the form of advance fees collected, in violation of Code Section  
18 10145 and Regulation 2831.1.

19 (f) Permitted Maziar Bordbor, corporate secretary and  
20 chief financial officer of LPCI, an unlicensed and unbonded  
21 person, to be an authorized signatory on the trust account, in  
22 violation of Code Section 10145 and Regulation 2834.

23 (g) (GHAZI, HAYNES, PACIFIC) The aforementioned former  
24 designated officers of LPCI failed to exercise adequate  
25 supervision over LPCI's activities requiring a real estate  
26

27

1 license to ensure LPCI's compliance the Real Estate Laws and  
2 Regulations and had no system in place for regularly monitoring  
3 LPCI's compliance with the Real Estate Law, in violation of Code  
4 Sections 10159.2, 10177(h) and Regulation 2725.

5 (h) Collected advance fees within the meaning of Code  
6 Section 10026 from homeowners including but not limited to  
7 Fannie/Cornell Scaife and Patricia Clark, seeking loan  
8 modifications wherein LPCI failed to provide all homeowners, with  
9 a pre-approved advance fee agreement from the Department in the  
10 form of a no objection letter, in violation of Code Section 10085  
11 and Regulation 2970.

12 (i) Failed to establish and maintain a trust account at  
13 a bank or other recognized financial institution in the name of  
14 the broker for deposit of collected advance fees by LPCI, in  
15 violation of Code Section 10146.

16 (j) With reference to the lack of an advance fee  
17 agreement, LPCI failed to provide a complete description of  
18 services to be rendered provided to each homeowner-borrower in 10  
19 point type font and failed to provide an allocation and  
20 disbursement of the amount collected as the advance fee, in  
21 violation of Code Section 10146 and Regulation 2972.

22 (k) (1) (PACIFIC) Used the fictitious name of  
23 "RefiFix.com", to conduct licensed activities including loan  
24 modifications without holding a license bearing said fictitious  
25

1 business name, in violation of Code Section 10159.5 and  
2 Regulation 2731.

3 (k) (2) (GHAZI, HAYNES, PACIFIC) Used the fictitious name  
4 of "Loan Processing Center", to conduct licensed activities  
5 including loan modifications without holding a license bearing  
6 said fictitious business name, in violation of Code Section  
7 10159.5 and Regulation 2731.

8 (k) (3) (HAYNES, PACIFIC) Used the fictitious name of  
9 "LPC", to conduct licensed activities including loan  
10 modifications without holding a license bearing said fictitious  
11 business name, in violation of Code Section 10159.5 and  
12 Regulation 2731.

13 (l) (GHAZI) Failed to retain the salesperson license  
14 certificate for James Starkey, in violation of Code Section 10160  
15 and Regulation 2753.

16 (m) (1) (GHAZI) After notice and subpoena on April 3,  
17 2009, failed to produce or retain all records of LPCI's activity  
18 during the audit period requiring a real estate broker license,  
19 in violation of Code Section 10148.

20 (m) (2) (PACIFIC) After notice and subpoena on May 13,  
21 2009, failed to produce or retain all records of LPCI's activity  
22 during the audit period requiring a real estate broker license,  
23 in violation of Code Section 10148.

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Disciplinary Statutes

11.

The conduct of Respondents LOAN PROCESSING CENTER INC.,  
MASHEED S. GHAZI, DANNY R. HAYNES and LOUIS LEON PACIFIC  
described in Paragraph 10, above, violated the Code and the  
Regulations as set forth below:

<u>PARAGRAPH</u>	<u>PROVISIONS VIOLATED</u>
10(a)	Code Section 10145 and Regulation 2832.1
10(b)	Code Sections 10176(a), 10176(b) and 10176(i) and/or 10177(g).
10(c)	10176(a), 10176(i) and/or 10177(j), 10235 and Regulation 2848
10(d)	Code Sections 10145, 10176(e) and 10176(i)
10(e)	Code Section 10145 and Regulation 2831.1
10(f)	Code Section 10145 and Regulation 2834

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10 (g)

10159.2, 10177(h) and Regulation  
2725

10 (h)

Code Section 10085 and Regulation  
2970

10 (i)

Code Section 10146

10 (j)

Code Section 10146 and Regulation  
2972

10 (k)

Code Section 10159.5 and Regulation  
2731

10 (l)

Code Section 10160 and Regulation  
2753

10 (m)

Code Section 10148

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1 The foregoing violations constitute cause for the discipline of  
2 the real estate license and license rights of LPCI, GHAZI, HAYNES  
3 and PACIFIC, under the provisions of Code Sections 10176(a), for  
4 misrepresentation, 10176(b), for false promises, 10176(i) and/or  
5 10177(j) for fraud or dishonest dealing, 10177(d) for willful  
6 disregard or for violation of the Real Estate Law, and/or  
7 10177(g), for negligence and 10177(h), for lack of supervision of  
8 LPCI's brokerage.

9 THIRD CAUSE OF ACTION  
10 (Advance Fees/Loan Modification Violations)

11 12.

12 At all times mentioned herein, Respondents LPCI, GHAZI,  
13 HAYNES and PACIFIC engaged in the business of an advance fee  
14 brokerage, within the definition of Code Sections 10131 and  
15 10131.2, in that, for fees received in advance, as well as at the  
16 conclusion of transactions, Respondents performed loan  
17 negotiation, modification services with respect to loans which  
18 were secured by liens on real property, including, but not  
19 limited to, the following named homeowner-borrowers:

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TABLE: ADVANCED FEES COLLECTED

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HOMEOWNER	DATES	PROCESSOR	ADVANCED FEE	BROKER	ADDRESS
Alexander Rogers	11/08 - 02/09	Faye Harrod	\$2,495	Haynes	6860-1 Panamint Road San Diego, CA 92139
Robert/Graciela Lozano	08/09 -	Tony Torrez	\$2,750	Haynes	6544 Sagebrush Way Sacramento, CA 95842
Jorge/Maria Rodriguez	04/04/09	Sandra Larios	\$3,375	Haynes	7718 Klump Ave. Sun Valley, CA 91352
Cesar Benevides	02/12/09	Frank/Amanda	\$3,980	Haynes	1609 102nd Ave. Oakland, Ca 94603
Azar Hassan Abadi	05/20/09	Masheed Ghazi	\$1500	Haynes	27201 South Ridge Dr. Mission Viejo, CA 92692
Lisa Schroeder	01-07-09	Christopher	\$ 750	Haynes	3914 Kern St. Sacramento, CA 95838
John/Christine Slocum	March 2009	Masheed Ghazi	\$1750	Ghazi	1645 Roberts Rd. Muskegon, MI 49445
Mathew/Gregoria Cahill	04/27/09	MJ Jafari	\$1100	Ghazi	338 Bright St San Francisco, CA 91432
<b>Total Haynes</b>			<b>\$14,850</b>		
<b>Total Ghazi</b>			<b>\$2850</b>		
<b>Total</b>			<b>\$17,700</b>		

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13.

1 Respondents collected the above described advance fees  
2 pursuant to the provisions of a document entitled "Engagement  
3 Agreement Authorization for Services to Restructure or Resolve  
4 Mortgage Debt (Agreement), the written agreement herein, which  
5 document constitutes an advance fee agreement within the meaning  
6 of Code Section 10085.  
7

14.

8 Respondents failed to submit the written agreements  
9 referred to in Paragraph 13, above, to the Commissioner ten days  
10 before using them in violation of Code Section 10085 and  
11 Regulation 2970.  
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15.

13 The conduct, acts and/or omissions of Respondents LPCI,  
14 GHAZI, HAYNES and PACIFIC, as set forth above, are cause for the  
15 suspension or revocation of the licenses and license rights of  
16 said Respondents pursuant to Code Sections 10085, 10177(d) and/or  
17 10177(g).  
18  
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16.

20 Respondents LPCI, GHAZI, HAYNES and PACIFIC  
21 intentionally or negligently engaged in the conduct set forth  
22 above and engaged in negligent misrepresentation, in violation of  
23 Code Sections 10176(a), 10176(i) and/or 10177(g).  
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17.

1 Respondents LPCI, GHAZI, HAYNES and PACIFIC conduct  
2 constitutes a breach of fiduciary duty owed to homeowner-  
3 borrowers Fannie/Cornell Scaife and Patricia Clark and  
4 constitutes cause for the suspension or revocation of the Real  
5 Estate license and license rights of said Respondents pursuant to  
6 Code Section 10176(i) and/or 10177(g).  
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18.

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9 The overall conduct of Respondents LPCI, GHAZI, HAYNES  
10 and PACIFIC, constitutes negligence or incompetence. This  
11 conduct and violation are cause for the suspension or revocation  
12 of the real estate license and license rights of said Respondents  
13 pursuant to Code Section 10177(g).  
14

19.

15 The overall conduct of Respondents GHAZI, HAYNES and  
16 PACIFIC constitutes a failure on said Respondents' part, as  
17 former officers designated by a corporate broker licensee, to  
18 exercise the reasonable supervision and control over the licensed  
19 activities of LPCI, as required by Code Sections 10211 and  
20 10159.2, and to keep LPCI in compliance with the Real Estate Law,  
21 and is cause for the suspension or revocation of the real estate  
22 license and license rights of GHAZI, HAYNES and PACIFIC pursuant  
23 to the provisions of Code Sections 10177(d), 10177(g) and  
24 10177(h) and Regulation 2725.  
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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 LOAN  
5 PROCESSING CENTER INC., MASHEED S. GHAZI, DANNY R. HAYNES and  
6 LOUIS LEON PACIFIC under the Real Estate Law (Part 1 of Division  
7 4 of the Business and Professions Code) and for such other and  
8 further relief as may be proper under other applicable provisions  
9 of law including but not limited to restitution pursuant to  
10 Government Code Sections 11519 and 11519.1 of the Administrative  
11 Procedures Act.

12 Dated at Los Angeles, California

13 this 9 MARCH, 2010

14 Neal Shigemitsu  
15 Deputy Real Estate Commissioner

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22 cc: Loan Processing Center Inc.  
23 Masheed S. Ghazi, former D.O.  
24 Danny R. Haynes, former D.O.  
25 Louis Leon Pacific, former D.O.  
26 Neal Shigemitsu  
27 Sacto  
Audits - Lisa Kwong  
Audits - Danio Fajardo  
Amelia Vetrone