



On May 19, 2010, Robin Trujillo made the First Amended Accusation in her official capacity as a Deputy Real Estate Commissioner of the State of California. On June 3, 2011, the First Amended Accusation, Statement to Respondent, and Notice of Defense were mailed by certified mail, return receipt requested, and by regular mail to the expired forwarding address of Respondent, which was listed by the post office on the December 23, 2010 mailing. The June 3, 2011 mailing was returned to sender by the postal service with no forwarding address. No response has been received to date.

On September 20, 2011, no Notice of Defense having been filed herein within the time prescribed by Section 11506 of the Government Code, Respondent's default was entered herein.

2.

Respondent is presently licensed and/or has license rights under the Real Estate Law, Part 1 of Division 4 of the California Business and Professions Code ("Code") as a real estate broker.

3.

On July 10, 2008, Respondent filed Articles of Incorporation with the California Secretary of State, naming him as the incorporator and agent for service of process for EQ Group, Inc ("EQ").

4.

On or about August 11, 2009, Sylvia Miranda signed an agreement on EQ letterhead, authorizing Respondent "of EQ Group, Inc." to represent her and negotiate on her behalf regarding all matters pertaining to her home loan. Sylvia Miranda also submitted advance fees of \$1,000 to EQ, for the purpose of performing a loan modification, on August 11, 2009.

5.

On or about August 18, 2008, Mylah Balitao signed an agreement on EQ letterhead, authorizing Respondent "of EQ Group, Inc." to represent her and negotiate on her behalf regarding all matters pertaining to her home loan. Mylah Balitao also submitted advance fees of \$1,900 to EQ, for the purpose of performing a loan modification, on August 18, 2008.

6.

On or about October 28, 2008, Joshua Linstrom signed an agreement on EQ letterhead, authorizing Respondent "of EQ Group, Inc." to represent him and negotiate on his behalf regarding all matters pertaining to her home loan. EQ also requested and received advance fees of \$3,500 from Linstrom for the purpose of performing a loan modification.

7.

On or about August 4, 2008, Charlie Clark was solicited over telephone regarding loan modification services provided by EQ. On this date, Mr. Clark entered into an agreement for EQ to provide loan modification services for his home loan. Charlie Clark also submitted advance fees of \$3,000 to EQ, for the purpose of performing a loan modification, on August 4, 2008. On August 15, 2008, Respondent sent a letter to Countrywide loans on EQ letterhead, indicating that he represented Charlie Clark. On November 4, 2008, LAVI sent a letter to Mr. Clark on EQ letterhead, requesting tax returns "in order to finish your loan modification". On April 9, 2009, Charlie Clark received a release agreement from EQ, which would authorize transferring Mr. Clark's advance fees to Respondent.

8.

On or about February 9, 2011, Respondent was disbarred from the practice of law in California by the Supreme Court of California, in Case No. S188651. The disbarment was based upon a Decision and Order of Involuntary Inactive Enrollment filed by the State Bar Court of California against Respondent on October 6, 2010.

9.

The Decision and Order of Involuntary Inactive Enrollment contained factual findings, based upon clear and convincing evidence that Respondent failed to maintain client funds in a trust account, Respondent misappropriated client funds, Respondent engaged in unauthorized practice of law in another jurisdiction and Respondent failed to refund unearned fees paid to EQ.

DETERMINATION OF ISSUES

1.

The agreements described in Paragraphs 4 through 7 above, constitute advance fee agreements within the meaning of Code Section 10026. Respondent failed to submit the advance fee agreements referred to in Paragraphs 4 through 7 above, to the Commissioner ten days before using them, in violation of Code Section 10085 and Section 2970 of Title 10, California Code of Regulations ("Regulations").

2.

The conduct, acts and/or omissions of Respondent, as set forth in paragraphs 4 through 7 above, are cause for the suspension or revocation of the licenses and license rights of Respondent, pursuant to Code Sections 10085, 10177(d) and 10177(g).

3.

The allegations set forth in Paragraphs 8 and 9 above constitute cause under Section 10177(f) of the Code for the suspension or revocation of the license and license rights of Respondent under the Real Estate Law.

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

ORDER

The license and license rights of Respondent  
STEPHEN PAUL COLLETTE 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 NOV 10 2011.

DATED: 10/17/11.

BARBARA J. BIGBY  
Acting Real Estate Commissioner



**FILED**

1 Department of Real Estate  
320 West Fourth Street, Suite 350  
2 Los Angeles, CA 90013

SEP 20 2011

3 (213) 576-6982  
4  
5  
6  
7

DEPARTMENT OF REAL ESTATE  
BY: Sumit Shah

8 BEFORE THE DEPARTMENT OF REAL ESTATE

9 STATE OF CALIFORNIA

|    |  |     |                      |
|----|--|-----|----------------------|
| 10 |  | *** |                      |
| 11 | In the Matter of the Accusation of )     |     | No. H-36993 LA       |
|    | )  |     |                      |
| 12 | <u>STEPHEN PAUL COLLETTE</u> and RAMIN ) |     |                      |
|    | LAVI, )                                  |     | <u>DEFAULT ORDER</u> |
| 13 | )  |     |                      |
|    | Respondents. )                           |     |                      |
| 14 | )  |     |                      |

15  
16 Respondent STEPHEN PAUL COLLETTE, having failed to  
17 file a Notice of Defense within the time required by Section  
18 11506 of the Government Code, is now in default. It is,  
19 therefore, ordered that a default be entered on the record  
20 in this matter.

21 IT IS SO ORDERED SEPTEMBER 19, 2011

22  
23 BARBARA J. BIGBY  
Acting Real Estate Commissioner

24  
25 By: Phillip Ihde  
26 PHILLIP IHDE  
Regional Manager  
27

SFACTO  
FIAG

**FILED**

1 Department of Real Estate  
320 West Fourth Street, #350  
2 Los Angeles, California 90013

SEP 06 2011

3 (213) 576-6982  
4 (213) 576-6910

DEPARTMENT OF REAL ESTATE  
BY: Amirah Alavi

8 BEFORE THE DEPARTMENT OF REAL ESTATE

9 STATE OF CALIFORNIA

10 \* \* \*

|    |   |   |                                  |
|----|---|---|----------------------------------|
| 11 | In the Matter of the Accusation of          | ) | No. H-36993 LA                   |
| 12 |   | ) | L-2011010830                     |
| 13 | STEVEN PAUL COLLETE and <u>RAMIN LAVI</u> , | ) | <u>STIPULATION AND AGREEMENT</u> |
| 14 | Respondents.                                | ) |                                  |

15 It is hereby stipulated by and between RAMIN LAVI  
16 (sometimes referred to as "Respondent") and the Complainant,  
17 acting by and through James A. Demus, Counsel for the Department  
18 of Real Estate, as follows for the purpose of settling and  
19 disposing of the Accusation filed on December 23, 2010 and the  
20 First Amended Accusation filed on June 3, 2011, in this matter:

- 21 1. All issues which were to be contested and all  
22 evidence which was to be presented by Complainant and  
23 Respondents at a formal hearing on the Accusation, which hearing  
24 was to be held in accordance with the provisions of the  
25 Administrative Procedure Act ("APA"), shall instead and in place  
26 thereof be submitted solely on the basis of the provisions of

1 this Stipulation and Agreement ("Stipulation").

2           2. Respondent has received, read and understands the  
3 Statement to Respondent, the Discovery Provisions of the APA and  
4 the Accusation, filed by the Department of Real Estate in this  
5 proceeding.

6           3. On December 30, 2010, Respondent filed a Notice of  
7 Defense pursuant to Section 11506 of the Government Code for the  
8 purpose of requesting a hearing on the allegations in the  
9 Accusation. Respondent hereby freely and voluntarily withdraws  
10 said Notice of Defense. Respondent acknowledges that she  
11 understands that by withdrawing said Notice of Defense, she will  
12 thereby waive her right to require the Commissioner to prove the  
13 allegations in the Accusation at a contested hearing held in  
14 accordance with the provisions of the APA and that she will  
15 waive other rights afforded to her in connection with the  
16 hearing such as the right to present evidence in defense of the  
17 allegations in the Accusation and the right to cross-examine  
18 witnesses.

19           4. This Stipulation is based on the factual  
20 allegations contained in the Accusation filed in this  
21 proceeding. In the interest of expedience and economy,  
22 Respondent chooses not to contest these factual allegations, but  
23 to remain silent and understands that, as a result thereof,  
24 these factual statements will serve as a prima facie basis for  
25 the disciplinary action stipulated to herein. The Real Estate  
26 Commissioner shall not be required to provide further evidence  
27 to prove such allegations.





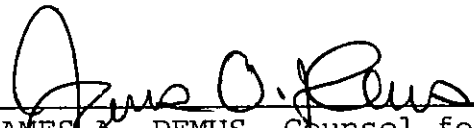


1 suspension. Should no such determination be made, the stay  
2 imposed herein shall become permanent.

3 II

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

11  
12  
13 DATED: 8/18/11

  
14 JAMES A. DEMUS, Counsel for the  
15 Department of Real Estate

16 \* \* \*

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

mitigation of the charges.

Respondent can signify acceptance and approval of the terms and conditions of this Stipulation and Agreement by faxing a copy of the signature page, as actually signed by Respondent, to the Department at the following fax number: (213) 576-6917. Respondent agrees, acknowledges and understands that by electronically sending to the Department a fax copy of her actual signature as it appears on the Stipulation and Agreement, that receipt of the faxed copy by the Department shall be as binding on Respondent as if the Department had received the original signed Stipulation and Agreement.

DATED: \_\_\_\_\_

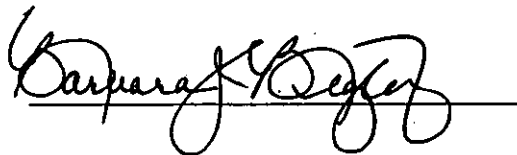
RAMIN LAVI  
Respondent

\* \* \*

The foregoing Stipulation and Agreement is hereby adopted as my Decision and Order in this matter, and shall become effective at 12 o'clock noon on **SEP 26 2011**.

IT IS SO ORDERED 8/26, 2011.

BARBARA J. BIGBY  
Acting Real Estate Commissioner



1 mitigation of the charges.

2 Respondent can signify acceptance and approval of the  
3 terms and conditions of this Stipulation and Agreement by faxing  
4 a copy of the signature page, as actually signed by Respondent,  
5 to the Department at the following fax number: (213) 576-6917.  
6 Respondent agrees, acknowledges and understands that by  
7 electronically sending to the Department a fax copy of her  
8 actual signature as it appears on the Stipulation and Agreement,  
9 that receipt of the faxed copy by the Department shall be as  
10 binding on Respondent as if the Department had received the  
11 original signed Stipulation and Agreement.

12  
13  
14 DATED: 8/16/11

Ramin Lavi  
RAMIN LAVI  
Respondent

15  
16 \* \* \*

17 The foregoing Stipulation and Agreement is hereby  
18 adopted as my Decision and Order in this matter, and shall  
19 become effective at 12 o'clock noon on \_\_\_\_\_  
20

21 IT IS SO ORDERED \_\_\_\_\_, 2011.

22  
23 BARBARA J. BIGBY  
24 Acting Real Estate Commissioner  
25  
26 \_\_\_\_\_  
27

SAC TO  
PLAG

**FILED**

1 JAMES DEMUS, Counsel (SBN 225005)  
2 Department of Real Estate  
3 320 West Fourth St., #350  
4 Los Angeles, CA 90013  
5  
6  
7  
8  
9  
10  
11  
12  
13  
14  
15  
16  
17  
18  
19  
20  
21  
22  
23  
24  
25  
26  
27

JUN 03 2011

DEPARTMENT OF REAL ESTATE  
BY: Justine Valenzuela

(213) 576-6982  
(213) 576-6910 (direct)

BEFORE THE DEPARTMENT OF REAL ESTATE  
STATE OF CALIFORNIA

\* \* \*

|                                    |   |                      |
|------------------------------------|---|----------------------|
| In the Matter of the Accusation of | ) | No. H-36993 LA       |
|                                    | ) | OAH No.L-2011010830  |
| STEPHEN PAUL COLLETTE and RAMIN    | ) |                      |
| LAVI,                              | ) | <u>FIRST AMENDED</u> |
|                                    | ) | <u>ACCUSATION</u>    |
| Respondents.                       | ) |                      |

This Accusation amends the Accusation filed on December 23, 2010. The Complainant, Robin Trujillo, a Deputy Real Estate Commissioner of the State of California, for cause of Accusation against STEPHEN PAUL COLLETTE and RAMIN LAVI, 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.

2.

STEPHEN PAUL COLLETTE, (hereinafter "COLLETTE") is presently licensed and/or has license rights under the Real

1 Estate Law (Part 1 of Division 4 of the Business and  
2 Professions Code, hereinafter "Code"), as a real estate broker.

3 3.

4 RAMIN LAVI, (hereinafter "LAVI") is presently  
5 licensed and/or has license rights under the Real Estate Law,  
6 hereinafter "Code"), as a real estate salesperson.

7 4.

8 EQ Group, Inc (hereinafter "EQ"), is not now and has  
9 never been licensed by the Department in any capacity. On July  
10 10, 2008, COLLETTE filed Articles of Incorporation with the  
11 California Secretary of State, naming COLLETTE as the  
12 incorporator and agent for service of process for EQ. On May  
13 1, 2009, COLLETTE submitted a letter to the Department in which  
14 he admitted being part owner of EQ and described the loan  
15 modification business performed by EQ in detail.

16 FIRST CAUSE OF ACCUSATION

17 (Advance Fee Violations)

18 5.

19 COLLETTE engaged in the business of a real estate  
20 broker in the State of California within the meaning of Code  
21 Sections 10131(d) and 10131.2, including brokering mortgage  
22 loans and performing loan modification activities and claiming,  
23 demanding, charging, receiving, collecting or contracting for  
24 the collection of an advance fee, within the meaning of Code  
25 Section 10026, including, but not limited to, the following  
26 loan modification activities with respect to loans which were  
27 secured by liens on real property.

6.

1  
2 Sylvia Miranda Transaction

3           On or about August 11, 2009, Sylvia Miranda signed an  
4 agreement on EQ letterhead, authorizing COLLETE "of EQ Group,  
5 Inc." to represent her and negotiate on her behalf regarding  
6 all matters pertaining to her home loan. Sylvia Miranda also  
7 submitted advance fees of \$1,000 to EQ, for the purpose of  
8 performing a loan modification, on August 11, 2009.

9           7.

10 Mylah Balitao Transaction

11           On or about August 18, 2008, Mylah Balitao signed an  
12 agreement on EQ letterhead, authorizing COLLETE "of EQ Group,  
13 Inc." to represent her and negotiate on her behalf regarding  
14 all matters pertaining to her home loan. Mylah Balitao also  
15 submitted advance fees of \$1,900 to EQ, for the purpose of  
16 performing a loan modification, on August 18, 2008.

17           8.

18 Joshua Linstrom Transaction

19           On or about October 28, 2008, Joshua Linstrom signed  
20 an agreement on EQ letterhead, authorizing COLLETE "of EQ  
21 Group, Inc." to represent her and negotiate on her behalf  
22 regarding all matters pertaining to her home loan. EQ also  
23 requested and received advance fees of \$3,500 from Linstrom for  
24 the purpose of performing a loan modification.

25 ///

26 ///

27 ///

Charlie Clark Transaction

On or about August 4, 2008, Charlie Clark was solicited over telephone by LAVI, regarding loan modification services provided by EQ. On this date, Mr. Clark entered into an agreement for EQ to provide loan modification services for his home loan. Charlie Clark also submitted advance fees of \$3,000 to EQ, for the purpose of performing a loan modification, on August 4, 2008. On August 15, 2008, COLLETTE sent a letter to Countrywide loans on EQ letterhead, indicating that he represented Charlie Clark. On November 4, 2008, LAVI sent a letter to Mr. Clark on EQ letterhead, requesting tax returns "in order to finish your loan modification". On April 9, 2009, Charlie Clark received a release agreement from EQ, which would authorize transferring Mr. Clark's advance fees to COLLETTE.

The agreements described in Paragraphs 6 through 9 above, constitute advance fee agreements within the meaning of Code Section 10026. COLLETTE failed to submit the advance fee agreements referred to in Paragraphs 6 through 9 above, to the Commissioner ten days before using them, in violation of Code Section 10085 and Section 2970 of Title 10, California Code of Regulations ("Regulations"). LAVI failed to submit the advance fee agreement, described in paragraph 9 above, to the Commissioner ten days before using it, in violation of Code Section 10085 and Regulation 2970.



1  
2  
3  
4  
5  
6  
7  
8  
9  
10  
11  
12  
13  
14  
15  
16  
17  
18  
19  
20  
21  
22  
23  
24  
25  
26  
27

11.

The conduct, acts and/or omissions of COLLETTE, as set forth in paragraphs 6 through 9 above, are cause for the suspension or revocation of the licenses and license rights of COLLETTE, pursuant to Code Sections 10085, 10177(d) and/or 10177(g).

12.

The conduct, acts and/or omissions of LAVI, as set forth in paragraphs 9 above, is cause for the suspension or revocation of the licenses and license rights of LAVI, pursuant to Code Sections 10085, 10177(d) and/or 10177(g).

SECOND CAUSE OF ACCUSATION

(License Discipline)

13.

On or about February 9, 2011, COLLETTE was disbarred from the practice of law in California by the Supreme Court of California, in Case No. S188651. The disbarment was based upon a Decision and Order of Involuntary Inactive Enrollment filed by the State Bar Court of California against COLLETTE on October 6, 2010.

14.

The Decision and Order of Involuntary Inactive Enrollment contained factual findings, based upon clear and convincing evidence that COLLETTE failed to maintain client funds in a trust account, COLLETTE misappropriated client funds, COLLETTE engaged in unauthorized practice of law in

1 another jurisdiction and COLLETTE's failed to refund unearned  
2 fees paid to EQ.

3 15.

4 The allegations set forth in Paragraphs 13 and 14  
5 above constitute cause under Section 10177(f) of the Code for  
6 the suspension or revocation of the license and license rights  
7 of COLLETTE under the Real Estate Law.

8 WHEREFORE, Complainant prays that a hearing be  
9 conducted on the allegations of this Accusation and that upon  
10 proof thereof, a decision be rendered imposing disciplinary  
11 action against all the licenses and license rights of  
12 Respondents STEPHEN PAUL COLLETTE and RAMIN LAVI under the Real  
13 Estate Law, and for such other and further relief as may be  
14 proper under other applicable provisions of law.

15 Dated at Los Angeles, California  
16 this 19 day of May, 2010.

17  
18   
19 \_\_\_\_\_  
20 Robin Trujillo  
21 Deputy Real Estate Commissioner

22  
23  
24 cc: STEPHEN PAUL COLLETTE  
25 RAMIN LAVI  
26 EQ Finance Inc.  
27 Robin Trujillo  
Sacto.

**FILED**

DEC 23 2010

DEPARTMENT OF REAL ESTATE

BY: Laura B. Diaz

1 JAMES DEMUS, Counsel (SBN 225005)  
2 Department of Real Estate  
3 320 West Fourth St., #350  
4 Los Angeles, CA 90013  
5  
6  
7  
8  
9  
10  
11  
12  
13  
14  
15  
16  
17  
18  
19  
20  
21  
22  
23  
24  
25  
26  
27

BEFORE THE DEPARTMENT OF REAL ESTATE

STATE OF CALIFORNIA

\* \* \*

|                                    |   |                            |
|------------------------------------|---|----------------------------|
| In the Matter of the Accusation of | ) | No. H-36993 LA             |
|                                    | ) |                            |
| STEPHEN PAUL COLLETTE and RAMIN    | ) | <u>A C C U S A T I O N</u> |
| LAVI,                              | ) |                            |
|                                    | ) |                            |
| Respondents.                       | ) |                            |

The Complainant, Robin Trujillo, a Deputy Real Estate Commissioner of the State of California, for cause of Accusation against STEPHEN PAUL COLLETTE and RAMIN LAVI, 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.

2.

STEPHEN PAUL COLLETTE, (hereinafter "COLLETTE") is presently licensed and/or has license rights under the Real

1 Estate Law (Part 1 of Division 4 of the Business and  
2 Professions Code, hereinafter "Code"), as a real estate broker.

3 3.

4 RAMIN LAVI, (hereinafter "LAVI") is presently  
5 licensed and/or has license rights under the Real Estate Law,  
6 hereinafter "Code"), as a real estate salesperson.

7 4.

8 EQ Group, Inc (hereinafter "EQ"), is not now and has  
9 never been licensed by the Department in any capacity. On July  
10 10, 2008, COLLETTE filed Articles of Incorporation with the  
11 California Secretary of State, naming COLLETTE as the  
12 incorporator and agent for service of process for EQ. On May  
13 1, 2009, COLLETTE submitted a letter to the Department in which  
14 he admitted being part owner of EQ and described the loan  
15 modification business performed by EQ in detail.

16 FIRST CAUSE OF ACCUSATION

17 (Advance Fee Violations)

18 5.

19 COLLETTE engaged in the business of a real estate  
20 broker in the State of California within the meaning of Code  
21 Sections 10131(d) and 10131.2, including brokering mortgage  
22 loans and performing loan modification activities and claiming,  
23 demanding, charging, receiving, collecting or contracting for  
24 the collection of an advance fee, within the meaning of Code  
25 Section 10026, including, but not limited to, the following  
26 loan modification activities with respect to loans which were  
27 secured by liens on real property.

6.

Sylvia Miranda Transaction

On or about August 11, 2009, Sylvia Miranda signed an agreement on EQ letterhead, authorizing COLLETE "of EQ Group, Inc." to represent her and negotiate on her behalf regarding all matters pertaining to her home loan. Sylvia Miranda also submitted advance fees of \$1,000 to EQ, for the purpose of performing a loan modification, on August 11, 2009.

7.

Mylah Balitao Transaction

On or about August 18, 2008, Mylah Balitao signed an agreement on EQ letterhead, authorizing COLLETE "of EQ Group, Inc." to represent her and negotiate on her behalf regarding all matters pertaining to her home loan. Mylah Balitao also submitted advance fees of \$1,900 to EQ, for the purpose of performing a loan modification, on August 18, 2008.

8.

Joshua Linstrom Transaction

On or about October 28, 2008, Joshua Linstrom signed an agreement on EQ letterhead, authorizing COLLETE "of EQ Group, Inc." to represent her and negotiate on her behalf regarding all matters pertaining to her home loan. EQ also requested and received advance fees of \$3,500 from Linstrom for the purpose of performing a loan modification.

///

///

///

Charlie Clark Transaction

. On or about August 4, 2008, Charlie Clark was solicited over telephone by LAVI, regarding loan modification services provided by EQ. On this date, Mr. Clark entered into an agreement for EQ to provide loan modification services for his home loan. Charlie Clark also submitted advance fees of \$3,000 to EQ, for the purpose of performing a loan modification, on August 4, 2008. On August 15, 2008, COLLETTE sent a letter to Countrywide loans on EQ letterhead, indicating that he represented Charlie Clark. On November 4, 2008, LAVI sent a letter to Mr. Clark on EQ letterhead, requesting tax returns "in order to finish your loan modification". On April 9, 2009, Charlie Clark received a release agreement from EQ, which would authorize transferring Mr. Clark's advance fees to COLLETTE.

## 10.

The agreements described in Paragraphs 6 through 9 above, constitute advance fee agreements within the meaning of Code Section 10026. COLLETTE failed to submit the advance fee agreements referred to in Paragraphs 6 through 9 above, to the Commissioner ten days before using them, in violation of Code Section 10085 and Section 2970 of Title 10, California Code of Regulations ("Regulations"). LAVI failed to submit the advance fee agreement, described in paragraph 9 above, to the Commissioner ten days before using it, in violation of Code Section 10085 and Regulation 2970.

1 11.

2 The conduct, acts and/or omissions of COLLETTE, as  
3 set forth in paragraphs 6 through 9 above, are cause for the  
4 suspension or revocation of the licenses and license rights of  
5 COLLETTE, pursuant to Code Sections 10085, 10177(d) and/or  
6 10177(g).

7 12.

8 The conduct, acts and/or omissions of LAVI, as set  
9 forth in paragraphs 9 above, is cause for the suspension or  
10 revocation of the licenses and license rights of LAVI, pursuant  
11 to Code Sections 10085, 10177(d) and/or 10177(g).

12 SECOND CAUSE OF ACCUSATION

13 (Conduct Warranting Denial of a Real Estate License)

14 13.

15 On or about June 21, 2010, an Order of Entry of  
16 Default, Order Enrolling Inactive and Further Orders were filed  
17 against COLLETTE's law license by the State Bar Court of  
18 California, in Case No. 09-O-10385-RAH. Among the terms of  
19 these Orders was a statement that "the factual allegations set  
20 forth in the notice of disciplinary charges have been deemed  
21 admitted."

22 14.

23 On or about April 9, 2010, the Notice of Disciplinary  
24 Charges was filed in the California State Bar Clerks Office for  
25 Los Angeles. Among the factual allegations contained in this  
26 notice were charges that COLLETTE failed to maintain client  
27 funds in a trust account, COLLETTE misappropriated client funds

1 and numerous charges regarding COLLETTE's failure to refund  
2 unearned fees paid to EQ.

3 15.

4 The allegations set forth in Paragraphs 13 and 14  
5 above constitute cause under Section 10177(f) of the Code for  
6 the suspension or revocation of the license and license rights  
7 of COLLETTE under the Real Estate Law.

8 WHEREFORE, Complainant prays that a hearing be  
9 conducted on the allegations of this Accusation and that upon  
10 proof thereof, a decision be rendered imposing disciplinary  
11 action against all the licenses and license rights of  
12 Respondents STEPHEN PAUL COLLETTE and RAMIN LAVI under the Real  
13 Estate Law, and for such other and further relief as may be  
14 proper under other applicable provisions of law.

15 Dated at Los Angeles, California  
16 this 14 day of October, 2010.

17  
18   
19 \_\_\_\_\_  
20 Robin Trujillo  
21 Deputy Real Estate Commissioner  
22  
23

24 cc: STEPHEN PAUL COLLETTE  
25 RAMIN LAVI  
26 EQ Finance Inc.  
27 Robin Trujillo  
Sacto.