

BEFORE THE DIRECTOR
OF THE DEPARTMENT OF CONSUMER AFFAIRS
PROFESSIONAL FIDUCIARIES BUREAU
STATE OF CALIFORNIA

In the Matter of the Statement of Issues Against: Case No. PF-2009-108

MARION ROSE MONTGOMERY
573 East Shelldrake Circle
Fresno, CA 93730

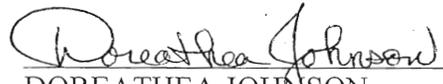
Respondent.

DECISION AND ORDER

The attached Stipulated Settlement and Disciplinary Order is hereby adopted as the Decision of the Director of Consumer Affairs in the above-entitled matter.

This Decision shall become effective on _____.

IT IS SO ORDERED 2/10/2011


DOREATHEA JOHNSON
Deputy Director, Legal Affairs
Department of Consumer Affairs



1 KAMALA D. HARRIS
Attorney General of California
2 FRANK H. PACOE
Supervising Deputy Attorney General
3 JONATHAN D. COOPER
Deputy Attorney General
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7
8 **BEFORE THE**
PROFESSIONAL FIDUCIARIES BUREAU
9 **DEPARTMENT OF CONSUMER AFFAIRS**
STATE OF CALIFORNIA

10 In the Matter of the Statement of Issues
11 Against:
12 **MARION ROSE MONTGOMERY**
13 **573 East Shelldrake Circle**
14 **Fresno, CA 93730**
15 Respondent.

Case No. PF-2009-108

**STIPULATED SETTLEMENT AND
DISCIPLINARY ORDER**

16
17 IT IS HEREBY STIPULATED AND AGREED by and between the parties to the above-
18 entitled proceedings that the following matters are true:

19 **PARTIES**

20 1. Gil DeLuna (Complainant) is the Acting Bureau Chief of the Professional Fiduciaries
21 Bureau (hereinafter "the Bureau."). He brought this action solely in his official capacity and is
22 represented in this matter by Kamala D. Harris, Attorney General of the State of California, by
23 Jonathan D. Cooper, Deputy Attorney General.

24 2. Respondent Marion Rose Montgomery (Respondent) is represented in this proceeding
25 by attorney Deborah K. Boyett, whose address is: 205 E. River Park Circle, Fresno, California
26 93720.

27 3. On or about November 19, 2009, Respondent filed an application dated November
28 16, 2009, with the Professional Fiduciaries Bureau.

CONTINGENCY

10. This stipulation shall be subject to approval by the Director of the Department of Consumer Affairs or his designee. Respondent understands and agrees that counsel for Complainant and the staff of the Professional Fiduciaries Bureau may communicate directly with the Director or his designee regarding this stipulation and settlement, without notice to or participation by Respondent or his counsel. By signing the stipulation, Respondent understands and agrees that she may not withdraw her agreement or seek to rescind the stipulation prior to the time the Director considers and acts upon it. If the Director fails to adopt this stipulation as the Decision and Order, the Stipulated Settlement and Disciplinary Order shall be of no force or effect, except for this paragraph, it shall be inadmissible in any legal action between the parties, and the Director shall not be disqualified from further action by having considered this matter.

11. The parties understand and agree that facsimile copies of this Stipulated Settlement and Disciplinary Order, including facsimile signatures thereto, shall have the same force and effect as the originals.

12. This Stipulated Settlement and Disciplinary Order is intended by the parties to be an integrated writing representing the complete, final, and exclusive embodiment of their agreement. It supersedes any and all prior or contemporaneous agreements, understandings, discussions, negotiations, and commitments (written or oral). This Stipulated Settlement and Disciplinary Order may not be altered, amended, modified, supplemented, or otherwise changed except by a writing executed by an authorized representative of each of the parties.

13. In consideration of the foregoing admissions and stipulations, the parties agree that the Bureau may, without further notice or formal proceeding, issue and enter the following Disciplinary Order:

DISCIPLINARY ORDER

IT IS HEREBY ORDERED that, within one week of the effective date of this Decision and Order, the Bureau shall provide Respondent with the authorization to take the federal and state portions of the California Professional Fiduciary Examination. Upon Respondent Marion Rose Montgomery having successfully taken and passed both the federal and state portions of the

1 California Professional Fiduciary Examination, a professional fiduciary license will be issued to
2 Respondent Marion Rose Montgomery and will immediately be revoked. The revocation will be
3 stayed and the Respondent placed on two (2) years of probation on the following terms and
4 conditions.

5 14. **Obey All Laws.** Respondent shall comply with all federal, state and local laws, and
6 all rules and regulations governing the practice of a professional fiduciary. A full and detailed
7 account of any and all violations of law shall be reported by Respondent to the Bureau within
8 seventy-two (72) hours of occurrence.

9 15. **Compliance With Court Orders.** Respondent shall comply with any court order
10 including the payment of a fine or penalty imposed by a court order for any court action relating
11 to any violation of duties of a professional fiduciary.

12 16. **Compliance with Criminal Probation Terms.** Within 72 hours of the imposition of
13 probation terms against Respondent in any criminal action, Respondent shall notify the Bureau of
14 said terms and shall provide the Bureau with a copy of the Court Order imposing said terms.
15 Respondent shall comply with all terms and conditions of probation imposed against her in any
16 criminal action and shall provide the Bureau with proof of compliance with said terms at such
17 time as such compliance is required by the Court Order imposing said terms.

18 17. **Compliance With Probation Terms.** During the period of probation, Respondent
19 shall comply with the terms and conditions of probation and demonstrate no cause for
20 disciplinary action or denial of licensure.

21 18. **Quarterly Reports And Interviews.** Respondent shall report quarterly to the Bureau
22 or its designee, under penalty of perjury, providing such information as specified by the Bureau,
23 stating whether there has been compliance with all terms and conditions of probation. Such
24 quarterly reports may, in the Bureau's discretion, be required to include all information that
25 would be required on the Bureau's annual statement form. In addition, the Bureau at its
26 discretion may require additional written and in-person reports regarding compliance with the
27 probationary terms and conditions. If the final written report is not made as directed, the period
28 of probation shall be extended until such time as the final report is received by the Bureau.

1 Respondent shall make available all records, books, logs and other documents to the Bureau,
2 upon request.

3 19. **Other Reports And Records.** Upon request by the Bureau, Respondent shall submit
4 to the Bureau reports related to Respondent's duties as a professional fiduciary including, but not
5 limited to, criminal court probation reports and other reports as specified by the Bureau.
6 Respondent shall submit specific records to the Bureau for inspection upon request by the Bureau.

7 20. **Maintain Active License.** Respondent shall, at all times while on probation,
8 maintain a current and active license with the Bureau, including any period during which
9 suspension or probation is tolled. Should Respondent's license, by operation of law or otherwise,
10 expire, then upon renewal Respondent's license shall be subject to any and all terms of this
11 probation not previously satisfied.

12 21. **Probation Monitoring Costs.** All costs incurred for probation monitoring during the
13 entire probation shall be paid by the Respondent. The monthly cost may be adjusted as expenses
14 are reduced or increased. Respondent's failure to comply with all terms and conditions may also
15 cause this amount to be increased.

16 22. **Absence from State/Practice.** In the event Respondent should leave California to
17 reside or practice outside the State, Respondent must provide written notification to the Bureau of
18 the dates of departure and return. Periods of residence or practice outside of California will not
19 apply to the reduction of the probationary period. In the event Respondent ceases to actively
20 practice as a fiduciary in California, Respondent must provide written notification of that fact to
21 the Bureau. The period when the Respondent is not practicing will not apply to the reduction of
22 the probationary period. Absence from the state or absence from practice shall not relieve the
23 Respondent from fulfilling the conditions of probation.

24 23. **Surrender Of License.** Following the effective date of this disciplinary order, if
25 Respondent is unable or unwilling to satisfy the terms and conditions of probation, Respondent
26 may voluntarily request the surrender of her license to the Bureau. The Bureau reserves the right
27 to evaluate Respondent's request and to exercise its discretion whether to grant the request or to
28 take any other action deemed appropriate and reasonable under the circumstances. Upon formal

1 acceptance of the surrender, Respondent shall, within fifteen (15) days, deliver her license
2 certificate and pocket license to the Bureau and Respondent shall no longer engage in any
3 practice for which a license is required. Upon formal acceptance of the tendered license,
4 Respondent will no longer be subject to the terms and conditions of probation.

5 Voluntary surrender of Respondent's license shall be considered to be a disciplinary action
6 and shall become a part of Respondent's license history with the Bureau. Respondent may not
7 petition the Bureau for reinstatement of the surrendered license. Should Respondent at any time
8 after voluntary surrender ever reapply to the Bureau for licensure, Respondent must meet all
9 requirements for licensure then in effect including, but not limited to, filing a current application,
10 meeting all educational requirements and taking and passing any and all examinations required of
11 new applicants.

12 Surrender without the written consent of the Bureau shall not, during any period in which
13 the license may be renewed, restored, reissued, or reinstated, deprive the Bureau of the authority
14 to initiate or continue a disciplinary proceeding against Respondent, or to enter an order
15 suspending or revoking the license, or otherwise to take disciplinary action.

16 **24. Violation Of Probation.** If Respondent violates the probationary terms and
17 conditions in any respect, the Bureau, after giving Respondent notice and the opportunity to be
18 heard, may vacate the stay and reinstate the disciplinary order which was stayed. If, during the
19 period of probation, an Accusation or Petition to Revoke Probation is filed against Respondent, or
20 if the matter has been submitted to the Office of the Attorney General for the filing of such, then
21 the Bureau shall have continuing jurisdiction until all matters are final, and the period of
22 probation shall be extended until all matters are final.

23 **25. Restoration Of License.** Upon successful completion of all of the probationary
24 terms and conditions and the expiration of the period of probation, Respondent's license shall be
25 unconditionally restored.

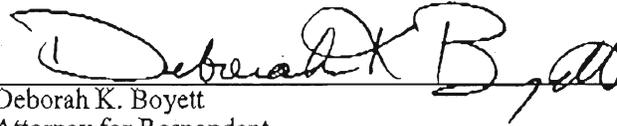
26 ACCEPTANCE

27 I have carefully read the above Stipulated Settlement and Disciplinary Order and have fully
28 discussed it with my attorney, Deborah K. Boyett. I understand the stipulation and the effect it

1 will have on my application for a professional fiduciary license. I enter into this Stipulated
 2 Settlement and Disciplinary Order voluntarily, knowingly, and intelligently, and agree to be
 3 bound by the Decision and Order of the Bureau.

4 DATED: 1/18/2011 
 5 MARION ROSE MONTGOMERY
 6 Respondent

6 I have read and fully discussed with Respondent Marion Rose Montgomery the terms and
 7 conditions and other matters contained in the above Stipulated Settlement and Disciplinary Order.
 8 I approve its form and content.

9 DATED: January 18, 2011 
 10 Deborah K. Boyett
 11 Attorney for Respondent

11 **ENDORSEMENT**

12 The foregoing Stipulated Settlement and Disciplinary Order is hereby respectfully
 13 submitted for consideration by the Department of Consumer Affairs.

14 Dated: 1/18/11

15 Respectfully Submitted,
 16 KAMALA D. HARRIS
 17 Attorney General of California
 18 FRANK H. PACOE
 19 Supervising Deputy Attorney General

20 
 21 JONATHAN D. COOPER
 22 Deputy Attorney General
 23 Attorneys for Complainant

24
25
26
27
28

Exhibit A

Statement of Issues No. PF-2009-108

1 EDMUND G. BROWN JR.
Attorney General of California
2 FRANK H. PACOE
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3 JONATHAN D. COOPER
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Attorneys for Complainant

8 **BEFORE THE**
9 **PROFESSIONAL FIDUCIARIES BUREAU**
10 **DEPARTMENT OF CONSUMER AFFAIRS**
11 **STATE OF CALIFORNIA**

11 In the Matter of the Statement of Issues
12 Against:

13 **MARION ROSE MONTGOMERY**

14 **573 East Shelldrake Circle**
15 **Fresno, CA 93730**

15 Respondent.

Case No. *PF 2009 108*

STATEMENT OF ISSUES

16 Complainant alleges:

17 **PARTIES**

18 1. Gil De Luna (Complainant) brings this Statement of Issues solely in his official
19 capacity as the Acting Bureau Chief of the Professional Fiduciaries Bureau, Department of
20 Consumer Affairs.

21 2. On or about November, 2009, the Professional Fiduciaries Bureau received an
22 application for a professional fiduciary license from Marion Rose Montgomery (Respondent). On
23 or about November 16, 2009, Respondent certified under penalty of perjury to the truthfulness of
24 all statements, answers, and representations in the application. The Bureau denied the application
25 on April 13, 2010.

26 **JURISDICTION**

27 3. This Statement of Issues is brought before the Professional Fiduciaries Bureau;
28

1 Department of Consumer Affairs, under the authority of the following laws. All section
2 references are to the Business and Professions Code unless otherwise indicated.

3 **STATUTORY AND REGULATORY PROVISIONS**

4 4. Section 480 of the California Business and Professions Code (“the Code”) states:

5 (a) A board may deny a license regulated by this code on the grounds that the applicant has
6 one of the following:

7 (1) Been convicted of a crime. A conviction within the meaning of this section means a plea
8 or verdict of guilty or a conviction following a plea of nolo contendere. Any action that a board is
9 permitted to take following the establishment of a conviction may be taken when the time for
10 appeal has elapsed, or the judgment of conviction has been affirmed on appeal, or when an order
11 granting probation is made suspending the imposition of sentence, irrespective of a subsequent
12 order under the provisions of Section 1203.4 of the Penal Code.

13 (2) Done any act involving dishonesty, fraud, or deceit with the intent to substantially
14 benefit himself or herself or another, or substantially injure another.

15 (3)(A) Done any act that if done by a licentiate of the business or profession in question,
16 would be grounds for suspension or revocation of license.

17 (B) The board may deny a license pursuant to this subdivision only if the crime or act is
18 substantially related to the qualifications, functions, or duties of the business or profession for
19 which application is made.

20 (b) Notwithstanding any other provision of this code, no person shall be denied a license
21 solely on the basis that he or she has been convicted of a felony if he or she has obtained a
22 certificate of rehabilitation under Chapter 3.5 (commencing with Section 4852.01) of Title 6 of
23 Part 3 of the Penal Code or that he or she has been convicted of a misdemeanor if he or she has
24 met all applicable requirements of the criteria of rehabilitation developed by the board to evaluate
25 the rehabilitation of a person when considering the denial of a license under subdivision (a) of
26 Section 482.

27 (c) A board may deny a license regulated by this code on the ground that the applicant
28 knowingly made a false statement of fact required to be revealed in the application for the license.

1 5. Section 6533 of the Code states:

2 In order to meet the qualifications for licensure as a professional fiduciary a person shall
3 meet all of the following requirements:

4 (a) Be at least 21 years of age.

5 (b) Be a United States citizen, or be legally admitted to the United States.

6 (c) Have not committed any acts that are grounds for denial of a license under Section 480
7 or 6536.

8 (d) Submit fingerprint images as specified in Section 6533.5 in order to obtain criminal
9 offender record information.

10 (e) Have completed the required prelicensing education described in Section 6538.

11 (f) Have passed the licensing examination administered by the bureau pursuant to Section
12 6539.

13 (g) Have at least one of the following:

14 (1) A baccalaureate degree of arts or sciences from a college or university accredited by a
15 nationally recognized accrediting body of colleges and universities or a higher level of education.

16 (2) An associate of arts or sciences degree from a college or university accredited by a
17 nationally recognized accrediting body of colleges and universities, and at least three years of
18 experience working as a professional fiduciary or working with substantive fiduciary
19 responsibilities for a professional fiduciary, public agency, or financial institution acting as a
20 conservator, guardian, trustee, personal representative, or agent under a power of attorney.

21 (3) Experience of not less than five years, prior to July 1, 2012, working as a professional
22 fiduciary or working with substantive fiduciary responsibilities for a professional fiduciary,
23 public agency, or financial institution acting as a conservator, guardian, trustee, personal
24 representative, or agent under a power of attorney.

25 (h) Agree to adhere to the Professional Fiduciaries Code of Ethics and to all statutes and
26 regulations.

27 (i) Consent to the bureau conducting a credit check on the applicant.

28 (j) File a completed application for licensure with the bureau on a form provided by the

1 bureau and signed by the applicant under penalty of perjury.

2 (k) Submit with the license application a nonrefundable application fee, as specified in this
3 chapter.

4 6. Section **6534** of the Code states, in pertinent part:

5 (a) The bureau shall maintain the following information in each licensee's file, shall make
6 this information available to a court for any purpose, including the determination of the
7 appropriateness of appointing or continuing the appointment of, or removing, the licensee as a
8 conservator, guardian, trustee, or personal representative, and shall otherwise keep this
9 information confidential, except as provided in subdivisions (b) and (c) of this section:

10
11 (7) Whether the licensee has filed for bankruptcy or held a controlling financial interest in a
12 business that filed for bankruptcy in the last 10 years.

13 (b) The bureau shall make the information in paragraphs (2), (4), (6), and (7) of subdivision
14 (a) available to the public.

15 (c) The bureau shall also publish information regarding licensees on the Internet as
16 specified in Section 27. The information shall include, but shall not be limited to, information
17 regarding license status and the information specified under subdivision (b).

18 7. Section **6536** of the Code states:

19 The bureau shall review all applications for licensure and may investigate an applicant's
20 qualifications for licensure. The bureau shall approve those applications that meet the
21 requirements for licensure, but shall not issue a license to any applicant who meets any of the
22 following criteria:

23 (a) Does not meet the qualifications for licensure under this chapter.

24 (b) Has been convicted of a crime substantially related to the qualifications, functions, or
25 duties of a professional fiduciary.

26 (c) Has engaged in fraud or deceit in applying for a license under this chapter.

27 (d) Has engaged in dishonesty, fraud, or gross negligence in performing the functions or
28 duties of a professional fiduciary, including engaging in such conduct prior to January 1, 2009.

1 (e) Has been removed as a professional fiduciary by a court for breach of trust committed
2 intentionally, with gross negligence, in bad faith, or with reckless indifference, or has
3 demonstrated a pattern of negligent conduct, including a removal prior to January 1, 2009, and all
4 appeals have been taken, or the time to file an appeal has expired.

5 8. Section 6537 of the Code states:

6 The bureau may deny a license for the reasons specified in Section 480 or 6536. An
7 applicant notified of the denial of his or her application for licensure shall have the right to appeal
8 to the bureau as specified in Chapter 2 (commencing with Section 480) of Division 1.5.

9 9. Section 6561 of the Code states, in pertinent part:

10 (a) A licensee shall initially, and annually thereafter, file with the bureau a statement under
11 penalty of perjury containing the following:

12 ...

13 (8) Whether the licensee has filed for bankruptcy or held a controlling financial interest in a
14 business that filed for bankruptcy in the last ten years.

15 ...

16 10. Section 6584 of the Code states, in pertinent part:

17 A license issued under this chapter may be suspended, revoked, denied, or other
18 disciplinary action may be imposed for one or more of the following causes:

19 ...

20 (d) Fraud, dishonesty, corruption, willful violation of duty, gross negligence or
21 incompetence in practice, or unprofessional conduct in, or related to, the practice of a professional
22 fiduciary. For purposes of this section, unprofessional conduct includes, but is not limited to, acts
23 contrary to professional standards concerning any provision of law substantially related to the
24 duties of a professional fiduciary.

25 ...

26 11. California Code of Regulations, Title 16, section 4422, states:

27 (a) A person applying for a license as a professional fiduciary shall submit an application
28 for licensure to the Bureau and pay the application fee required in Section 4580.

1 (b) An application for licensure shall require the applicant to meet the qualifications of
2 Section 6533 of the Business and Professions Code and, in addition, provide the following
3 information:

4 (1) For a determination of compliance with the education requirements under subdivision
5 (g) of Section 6533, if applicable, the applicant shall provide the names of the universities or
6 colleges, the dates of graduation, and the applicable degrees awarded.

7 (2) For a determination of compliance with the experience requirements under subdivision
8 (g) of Section 6533, if applicable, the applicant shall provide information regarding the qualifying
9 substantive fiduciary responsibilities, including type and dates of experience, and contact
10 information for three references, and shall provide consent for the Bureau to contact the
11 references for verification of specified experience.

12 (3) The applicant's physical business address, telephone number, and facsimile number.

13 (4) The applicant's designated address of record for public information.

14 (5) A list of any license or professional certificate ever held by the applicant, including
15 information regarding the type, state/country, license or certificate number, date issued, status,
16 and whether the license or certificate has been subject to disciplinary action, including revocation
17 or suspension. The applicant may attach a statement of explanation.

18 (6) Whether the applicant has filed for bankruptcy within the last ten (10) years or held a
19 controlling financial interest in a business when that business filed for bankruptcy within the last
20 ten (10) years, as required by paragraph (7) of subdivision (a) of Section 6534, and the date of the
21 bankruptcy filing. The applicant may attach a statement of explanation.

22 (7) Whether the applicant has ever been convicted of a crime. The applicant may attach a
23 statement of explanation.

24 (8) Whether the applicant has ever been found by a court to have breached a fiduciary duty,
25 the date, case name, court location, and case number associated with each breach of fiduciary
26 duty. The applicant shall submit a record of the court findings and orders related to each specific
27 case. The applicant may file an additional statement of the issues and facts pertaining to each
28 case.

1 (9) Whether the applicant has ever been removed as a fiduciary by a court for breach of
2 trust, the date, case name, court location, and case number associated with each removal. Whether
3 all related appeals have been taken or the time to file an appeal has expired. The applicant shall
4 submit a record of the court findings and orders related to each specific case. The applicant may
5 file an additional statement of the issues and facts pertaining to each case.

6 (10) Whether the applicant has ever resigned as a fiduciary in a matter in which a complaint
7 has been filed with the court, the date the complaint was filed, the date of the resignation, case
8 name, court location, and case number associated with each resignation, and a statement of the
9 issues and facts pertaining to each allegation. The applicant shall submit a record of the court
10 findings and orders related to each specific case.

11 (11) Whether the applicant has ever settled as a fiduciary in a matter in which a complaint
12 has been filed with the court, the date the complaint was filed, the date of the settlement, case
13 name, court location, and case number associated with each settlement, and a statement of the
14 issues and facts pertaining to each allegation. The applicant shall submit a record of the court
15 findings and orders related to each specific case.

16 (c) As used in this section “complaint” means a civil complaint, a petition, motion,
17 objection, or other pleading filed with the court against the licensee alleging the licensee has not
18 properly performed the duties of a fiduciary.

19 12. California Code of Regulations, Title 16, section **4520**, states:

20 For purposes of denial of a license pursuant to Division 1.5 (commencing with Section 475)
21 of the Business and Professions Code, a crime or act shall be considered to be substantially
22 related to the qualifications, functions or duties of a professional fiduciary if to a substantial
23 degree it demonstrates present or potential unfitness of a person holding a license to perform the
24 functions authorized by the license in a manner consistent with the public health, safety or
25 welfare. Such crimes or acts shall include but not be limited to fiscal dishonesty or breach of
26 fiduciary responsibilities of any kind.

27 13. California Code of Regulations, Title 16, section **4542**, states, in pertinent part:
28

1 (a) As provided for in the Act, each annual statement shall include the following
2 information:

3
4 (10) Whether the licensee has filed for bankruptcy or held a controlling financial interest in
5 a business when that business filed for bankruptcy in the last ten (10) years and the date of the
6 bankruptcy filing. The licensee may attach a statement of explanation.

7
8 **CAUSE FOR DENIAL OF APPLICATION**

9 (Failure to Meet Qualifications)

10 14. Respondent's application is subject to denial under Code sections 6533(c), 6536(a),
11 6537 and 6584(d), and under California Code of Regulations Title 16, section 4520, in that she is
12 not qualified to be a professional fiduciary and has engaged in unprofessional conduct which is
13 substantially related to the qualifications, functions or duties of a professional fiduciary and
14 which demonstrates a present or potential unfitness of a person holding a license to perform the
15 functions authorized by the license in a manner consistent with the public health, safety or
16 welfare. The circumstances are as follows:

17 15. Respondent has been unable to manage her own financial affairs. In 2009,
18 Respondent was unable to make payments on a loan and declared bankruptcy. Respondent's past
19 inability to manage her financial affairs indicates a present and future inability and unfitness to
20 act as a professional fiduciary.

21 **PRAYER**

22 WHEREFORE, Complainant requests that a hearing be held on the matters herein alleged,
23 and that following the hearing, the Professional Fiduciaries Bureau, Department of Consumer
24 Affairs, issue a decision:

25 1. Denying the application of Marion Rose Montgomery for a professional fiduciary's
26 license;

27 2. Taking such other and further action as the Director deems necessary and proper.
28

DATED:

9/26/2010



GIL DE LUNA
Acting Bureau Chief
Professional Fiduciaries Bureau
Department of Consumer Affairs
State of California
Complainant

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