

STATE OF FLORIDA  
DEPARTMENT OF BUSINESS AND PROFESSIONAL REGULATION  
FLORIDA REAL ESTATE COMMISSION

DEPARTMENT OF BUSINESS AND  
PROFESSIONAL REGULATION,  
DIVISION OF REAL ESTATE,

Petitioner,

vs.

Case No. 08-58027PL  
FDBPR Case No. 2007020897

MICHAEL W. BUGG,

Respondent.

\_\_\_\_\_ /

FINAL ORDER

THIS CAUSE came on to be heard before the Florida Real Estate Commission ("Commission") pursuant to Sections 120.569 and 120.57(1), Florida Statutes, on September 15, 2009, in Orlando, Orange County, Florida, for the purpose of considering Administrative Law Judge Lisa Shearer Nelson's Recommended Order in the above styled case. A copy of said Recommended Order is attached hereto and incorporated as Exhibit "A."

Respondent was present, and was represented by counsel. The Petitioner was represented by Patrick Cunningham, Esquire,

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DIVISION OF  
ADMINISTRATIVE  
HEARINGS  
FILED

Senior Attorney for the Department of Business and Professional Regulation, Division of Real Estate, Orlando, Orange County, Florida. The Commission was represented by Tom Barnhart, Senior Assistant Attorney General, Tallahassee, Leon County, Florida.

After a review of the complete record in this matter, including consideration of the Administrative Law Judge's Recommended Order and the arguments of each party, the Commission makes the following findings of fact and conclusions of law:

**Findings of Fact**

1. The Administrative Law Judge's findings of fact as set forth in the Exhibit "A" are approved, adopted, and incorporated herein by reference.
2. There is competent, substantial evidence to support the Administrative Law Judge's findings of fact as adopted by the Commission.

**Conclusions of Law**

3. The Commission has jurisdiction of this matter pursuant to Sections 120.569 and 120.57(1), Florida Statutes, Chapter 475, Part I, Florida Statutes, and Chapter 61J2 of the Florida Administrative Code.

4. The Administrative Law Judge's conclusions of law as

set forth in Exhibit "A" are approved, adopted, and incorporated herein by reference.

5. There is competent, substantial evidence to support the Administrative Law Judge's conclusions of law in Exhibit "A" as amended and adopted by the Commission.

**DISPOSITION**

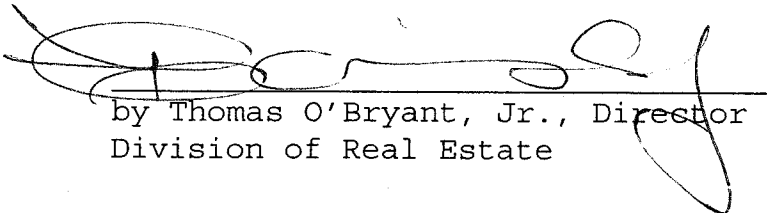
6. The Administrative Law Judge's Recommendation is approved and adopted by the Commission in its entirety.

WHEREFORE, IT IS HEREBY ORDERED and ADJUDGED that:

The Administrative Complaint against Respondent, Michael W. Bugg, is DISMISSED.

This Final Order shall take effect upon being filed with the Clerk of the Department of Business and Professional Regulation.

DONE and ORDERED this 15 day of October 2009, by the Florida Real Estate Commission.

  
by Thomas O'Bryant, Jr., Director  
Division of Real Estate

**NOTICE OF RIGHT TO JUDICIAL REVIEW**

A party who is adversely affected by this final order is

entitled to judicial review pursuant to section 120.68, Florida Statutes. Review proceedings are governed by the Florida Rules of Appellate Procedure. Such proceedings are commenced by filing one copy of a Notice of Appeal with the agency clerk of the Department of Business and Professional Regulation and a second copy, accompanied by filing fees prescribed by law, with the district court of appeal in the appellate district where the party resides. The Notice of Appeal must be filed within thirty (30) days of rendition of the order to be reviewed.

#### CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a true and correct copy of the foregoing Final Order has been provided by U.S. Mail to William Haley, Esquire, Brannon, Brown, Haley & Bullock, P.O. Box 1029, Lake City, Florida 32056 ; Lisa Shearer Nelson, Administrative Law Judge, Division of Administrative Hearings, The Desoto Building, 1230 Apalachee Parkway, Tallahassee, Florida 32399-3060; and Tom Barnhart, Senior Assistant Attorney General, Office of the Attorney General, PL-01, The Capitol, Tallahassee, Florida

32399-1050, and by inter-office mail to Patrick Cunningham,  
 Esquire, 400 West Robinson Street, Suite N801, Orlando, Florida  
 32801 on this 28<sup>th</sup> day of October, 2009.

Brandon M. Nichols

7008 1830 0001 1441 1000 0881 9007

U.S. Postal Service™	
<b>CERTIFIED MAIL™ RECEIPT</b>	
<i>(Domestic Mail Only; No Insurance Coverage Provided)</i>	
For delivery information visit our website at <a href="http://www.usps.com">www.usps.com</a>	
<b>OFFICIAL USE</b>	
Postage	\$
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Return Receipt Fee (Endorsement Required)	
Restricted Delivery Fee (Endorsement Required)	
Total Postage & Fees	\$
Postmark Here	
Sent To William Helweg, Esq. Street, Apt. No. or P.O. Box No. <u>Box 1029</u> City, State, ZIP+4 <u>Lake City, FL</u>	
PS Form 3800, August 2006 See Reverse for Instructions	

STATE OF FLORIDA  
DEPARTMENT OF BUSINESS AND PROFESSIONAL REGULATION  
FLORIDA REAL ESTATE COMMISSION

FLORIDA DEPARTMENT OF BUSINESS  
AND PROFESSIONAL REGULATION,  
DIVISION OF REAL ESTATE,

08-5802PL

FILED  
2008 NOV 19 A 11:50  
DIVISION OF  
ADMINISTRATIVE  
HEARINGS

Petitioner,

vs.

FDBPR Case N° 2007020897

MICHAEL W. BUGG,

Respondent.

**ADMINISTRATIVE COMPLAINT**

State of Florida, Department of Business and Professional Regulation, Division of Real Estate ("Petitioner") files this Administrative Complaint against Michael W. Bugg ("Respondent") and alleges:

**ESSENTIAL ALLEGATIONS OF MATERIAL FACT**

1. Petitioner is a state government licensing and regulatory agency charged with the responsibility and duty to prosecute Administrative Complaints pursuant to the laws of the State of Florida, in particular Section 20.165 and Chapters 120, 455 and 475, of the Florida Statutes and the rules promulgated pursuant thereto.
2. Respondent is and was at all times material hereto a licensed Florida real estate broker, issued license number 3013375 in accordance with Chapter 475 of the Florida Statutes.
3. The last license issued was as a broker at 1400 Marsh Landing Pkwy., #112, Jacksonville Beach, Florida 32250.

4. Respondent was the qualifying broker for Lifestyles Realtors, LLC, a licensed brokerage in the state of Florida.

5. On or about December 2005 Respondent employed Clifton Amos Coates with Lifestyles Realtors, LLC a licensed brokerage in the state of Florida.

6. At all times material Respondent knew or should have known that on or about December 2005 Clifton Amos Coates was not a licensed real estate sales associate or broker in the state of Florida.

7. On or about December 3, 2005 Respondent knew or should have known that Clifton Amos Coates, as an agent for broker Michael Bugg and Lifestyles Realtors, LLC, negotiated a contract with Gina Gatlin for the purchase of condominium apartment at Esplanade, At Town Center, unit 102. A copy of the Sales Report is attached hereto and incorporated herein as Administrative Complaint Exhibit 1.

8. At all times material, Respondent instructed Julie Seago, a licensed sales associate to sign the Gina Gatlin sales contract. A copy of the correspondence is attached hereto and incorporated herein as Administrative Complaint Exhibit 2.

9. Respondent and Lifestyles Realtors, LLC paid Clifton Amos Coates a commission for the purchase by Gina Gatlin of a real property.

#### COUNT I

Based upon the foregoing, Respondent is guilty of aiding, assisting, procuring, employing, or advising any unlicensed person or entity to practice a profession contrary to Chapter 455, 475 or the rules of the Petitioner in violation of Section 455.227(1)(j), Florida Statutes.

COUNT II

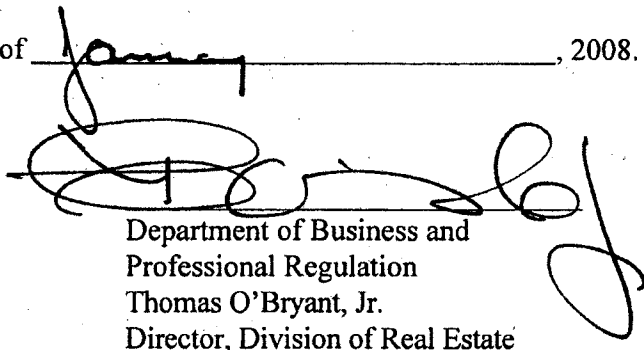
Based upon the foregoing, Respondent is guilty of having employed any person as a sales associate who is not the holder of a valid and current license as sales associate in violation of Section 475.42(1)(c), Florida Statutes and, therefore, in violation of Section 475.25(1)(e), Florida Statutes.

WHEREFORE, Petitioner respectfully requests the Florida Real Estate Commission, or the Department of Business and Professional Regulation, as may be appropriate, to issue a Final Order as final agency action finding the Respondent(s) guilty as charged. The penalties which may be imposed for violation(s) of Chapter 475 of the Florida Statutes, depending upon the severity of the offense(s), include: revocation of the license or registration or permit; suspension of the license, registration or permit for a period not to exceed ten (10) years, imposition of an administrative fine of up to \$5,000 for each count or offense; imposition of investigative costs; issuance of a reprimand; imposition of probation subject to terms including, but not limited to, requiring the licensee, registrant or permittee to complete and pass additional real estate education courses; publication; or any combination of the foregoing which may apply. *See* Section 475.25(1), Florida Statutes and Florida Administrative Code Rule 61J2-24.001. The penalties which may be imposed for violation(s) of Chapter 455 of the Florida Statutes, depending upon the severity of the offense(s), include: revocation of the license, registration, or permit; suspension of the license, registration, or permit for a period not to exceed ten (10) years; imposition of an administrative fine of up to \$5,000 for each count or offense; imposition of investigative costs; issuance of a reprimand; imposition of probation subject to terms including, but not limited to, requiring the licensee, registrant, or permittee

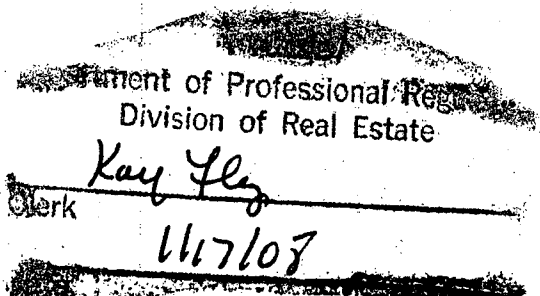


to complete and pass additional real estate education courses; publication; restriction of practice; injunctive or mandamus relief; imposition of a cease and desist order; or any combination of the foregoing which may apply. See Section 455.227, Florida Statutes and Florida Administrative Code Rule 61J2-24.001.

SIGNED this 17 day of January, 2008.



Department of Business and  
Professional Regulation  
Thomas O'Bryant, Jr.  
Director, Division of Real Estate



Department of Professional Regulation  
Division of Real Estate  
Clerk  
Kay Fly  
1/17/08

ATTORNEY FOR PETITIONER

Patrick J. Cunningham  
Senior Attorney  
Florida Bar N° 469221  
Division of Real Estate  
Department of Business and  
Professional Regulation,  
Legal Section - Suite N 801  
Hurston Bldg. North Tower  
400 West Robinson Street  
Orlando, Florida 32801-1757  
(407) 481-5632  
(407) 317-7260 FAX

/k  
PCP: RD/HF 1/08

FDBPR v. Michael W. Bugg  
Administrative Complaint

**FILED**  
2008 NOV 18  
Case No. 2007020897  
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DIVISION OF  
ADMINISTRATIVE  
HEARINGS

**NOTICE TO RESPONDENTS**

**PLEASE BE ADVISED** that mediation under Section 120.573 of the Florida Statutes, is not available for administrative disputes involving this type of agency action.

**PLEASE BE FURTHER ADVISED** that pursuant to this Administrative Complaint you may request, within the time allowed by law, a hearing to be conducted in this matter in accordance with Sections 120.569 and 120.57 of the Florida Statutes; that you have the right, at your option and expense, to be represented by counsel or other qualified representative in this matter; and that you have the right, at your option and expense, to take testimony, to call and cross-examine witnesses, and to have subpoena and subpoena duces tecum issued on your behalf if a formal hearing is requested.

**PLEASE BE FURTHER ADVISED** that if you do not file an Election of Rights form or some other responsive pleading with the Petitioner within twenty-one (21) days of receipt of this Administrative Complaint, the Petitioner will file with the Florida Real Estate Commission a motion requesting an informal hearing and entry of an appropriate Final Order which may result in the suspension or revocation of your real estate license or registration. Please see the enclosed Explanation of Rights and Election of Rights form.

MESSAGING (1/1/2006)

Esplanade  
Weekly Sales and Traffic Report

NUMBER OF WALK-INS		8/29/2006		Gary		Brenda & Joe Albano		257		1		A1A		Number don't work for investment	
Appointments	4														
TOTAL TRAFFIC FOR WEEK	4														
TOTAL TRAFFIC TO DATE	4														
Be-Backs	1000														
Be-Backs Appointments	0														
EXISTING CONTRACTS	244														
NEW CONTRACTS	0														
(LESS) CANCELS	1														
* UNDER CONTRACT		243													
* CLOSED		0													
* AVAILABLE		15													
* DEVELOPER/HOLD		0													
Time	63														
Investor	64														
at Home	126														
Total	243														

*[Handwritten signature]*

Explained At Town Center

B1	June	Scott Reid	Agent	\$122,400.00	5700.00	\$122,400.00	1/17/2008	11/23/2008	\$2,000.00	\$2,000.00	Chase	1/16/2008	2nd	8/22/2008	B W/D
A1	CHW	Dina Galkin	Agent	\$171,400.00	80.00	\$171,400.00	1/22/2008	1/22/2008	\$2,000.00	\$2,000.00	Washington	1/22/2008	2nd	8/22/2008	B W/D
B1	March	Benny Bell & Leah Lusan	Agent	\$22,400.00	80.00	\$22,400.00	1/22/2008	1/22/2008	\$2,000.00	\$2,000.00	Washington	1/22/2008	2nd	8/22/2008	B W/D
C1	Comm	Charles Eble	Agent	\$22,400.00	80.00	\$22,400.00	1/22/2008	1/22/2008	\$2,000.00	\$2,000.00	Washington	1/22/2008	2nd	8/22/2008	B W/D
B1	March	Thad Van Nguyen & Phuong Thi Nguyen	Agent	\$22,400.00	80.00	\$22,400.00	1/22/2008	1/22/2008	\$2,000.00	\$2,000.00	Washington	1/22/2008	2nd	8/22/2008	B W/D
B1	June	Steven Winfield	Agent	\$22,400.00	80.00	\$22,400.00	1/22/2008	1/22/2008	\$2,000.00	\$2,000.00	Washington	1/22/2008	2nd	8/22/2008	B W/D
A1	June	Steven Medina	Agent	\$22,400.00	80.00	\$22,400.00	1/22/2008	1/22/2008	\$2,000.00	\$2,000.00	Washington	1/22/2008	2nd	8/22/2008	B W/D
B2	June	Keith Davis	Agent	\$172,400.00	800.00	\$172,400.00	1/17/2008	1/17/2008	\$2,000.00	\$2,000.00	Chase	1/17/2008	2nd	8/22/2008	B W/D
B2	June		Agent	\$221,000.00	3700.00	\$221,000.00	1/17/2008	1/17/2008	\$2,000.00	\$2,000.00	Chase	1/17/2008	2nd	8/22/2008	B W/D
A2	June	Melissa and John DeChas	Agent	\$122,400.00	80.00	\$122,400.00	1/17/2008	1/17/2008	\$2,000.00	\$2,000.00	Chase	1/17/2008	2nd	8/22/2008	B W/D
A2	CHW	Robert Rosalenti	Agent	\$122,400.00	80.00	\$122,400.00	1/17/2008	1/17/2008	\$2,000.00	\$2,000.00	Chase	1/17/2008	2nd	8/22/2008	B W/D
B1	House	Jan Kessler	House	\$122,400.00	80.00	\$122,400.00	1/17/2008	1/17/2008	\$2,000.00	\$2,000.00	Chase	1/17/2008	2nd	8/22/2008	B W/D
A2	June	Dan Dimont/Linda Trus	Agent	\$122,400.00	80.00	\$122,400.00	1/17/2008	1/17/2008	\$2,000.00	\$2,000.00	Chase	1/17/2008	2nd	8/22/2008	B W/D
A2	March	Melinda Lewis	Agent	\$22,400.00	80.00	\$22,400.00	1/17/2008	1/17/2008	\$2,000.00	\$2,000.00	Chase	1/17/2008	2nd	8/22/2008	B W/D
A1	CHW	Brandi Green	Agent	\$177,400.00	80.00	\$177,400.00	1/17/2008	1/17/2008	\$2,000.00	\$2,000.00	Chase	1/17/2008	2nd	8/22/2008	B W/D
B2	March	Amy Quinn	Agent	\$122,400.00	80.00	\$122,400.00	1/17/2008	1/17/2008	\$2,000.00	\$2,000.00	Chase	1/17/2008	2nd	8/22/2008	B W/D
A1	June	Ruben Delgado	Agent	\$22,400.00	80.00	\$22,400.00	1/17/2008	1/17/2008	\$2,000.00	\$2,000.00	Chase	1/17/2008	2nd	8/22/2008	B W/D
A3	June	Martha Or	Agent	\$122,400.00	80.00	\$122,400.00	1/17/2008	1/17/2008	\$2,000.00	\$2,000.00	Chase	1/17/2008	2nd	8/22/2008	B W/D
A3	June	Jeffrey Hess	Agent	\$122,400.00	80.00	\$122,400.00	1/17/2008	1/17/2008	\$2,000.00	\$2,000.00	Chase	1/17/2008	2nd	8/22/2008	B W/D
A1	March	Alfonsa Armandowal	Agent	\$122,400.00	80.00	\$122,400.00	1/17/2008	1/17/2008	\$2,000.00	\$2,000.00	Chase	1/17/2008	2nd	8/22/2008	B W/D
B2	June	Marlene R. Opoka & Luz Bonnyer	Agent	\$122,400.00	80.00	\$122,400.00	1/17/2008	1/17/2008	\$2,000.00	\$2,000.00	Chase	1/17/2008	2nd	8/22/2008	B W/D
B1	March	Mandy Quinn	Agent	\$22,400.00	80.00	\$22,400.00	1/17/2008	1/17/2008	\$2,000.00	\$2,000.00	Chase	1/17/2008	2nd	8/22/2008	B W/D
B1	March	Stewart & Aileen Smith	Agent	\$22,400.00	80.00	\$22,400.00	1/17/2008	1/17/2008	\$2,000.00	\$2,000.00	Chase	1/17/2008	2nd	8/22/2008	B W/D
B1	June	Judy Jacob	Agent	\$22,400.00	80.00	\$22,400.00	1/17/2008	1/17/2008	\$2,000.00	\$2,000.00	Chase	1/17/2008	2nd	8/22/2008	B W/D
B1	June	Joyce Barry	Agent	\$22,400.00	80.00	\$22,400.00	1/17/2008	1/17/2008	\$2,000.00	\$2,000.00	Chase	1/17/2008	2nd	8/22/2008	B W/D
B1	CHW	Phillip Cooper	Agent	\$22,400.00	80.00	\$22,400.00	1/17/2008	1/17/2008	\$2,000.00	\$2,000.00	Chase	1/17/2008	2nd	8/22/2008	B W/D
A3	June	Rebel & Joseph Huhler	Agent	\$22,400.00	80.00	\$22,400.00	1/17/2008	1/17/2008	\$2,000.00	\$2,000.00	Chase	1/17/2008	2nd	8/22/2008	B W/D
C1	March	Ernesto & Emily Mulino	Agent	\$22,400.00	80.00	\$22,400.00	1/17/2008	1/17/2008	\$2,000.00	\$2,000.00	Chase	1/17/2008	2nd	8/22/2008	B W/D
B1	June	Joel & Terrence Millias	Agent	\$22,400.00	80.00	\$22,400.00	1/17/2008	1/17/2008	\$2,000.00	\$2,000.00	Chase	1/17/2008	2nd	8/22/2008	B W/D
A1	March	John Chubb	Agent	\$122,400.00	80.00	\$122,400.00	1/17/2008	1/17/2008	\$2,000.00	\$2,000.00	Chase	1/17/2008	2nd	8/22/2008	B W/D
A3	CHW	Alex Kabanov	Agent	\$122,400.00	80.00	\$122,400.00	1/17/2008	1/17/2008	\$2,000.00	\$2,000.00	Chase	1/17/2008	2nd	8/22/2008	B W/D
A3	CHW	Perlan & Paves Lazareanu	Agent	\$122,400.00	80.00	\$122,400.00	1/17/2008	1/17/2008	\$2,000.00	\$2,000.00	Chase	1/17/2008	2nd	8/22/2008	B W/D
B1	CHW	Lorenza & Carol Crawley	Agent	\$122,400.00	80.00	\$122,400.00	1/17/2008	1/17/2008	\$2,000.00	\$2,000.00	Chase	1/17/2008	2nd	8/22/2008	B W/D
B1	CHW	Michael Wright & Laronda Olson	Agent	\$122,400.00	80.00	\$122,400.00	1/17/2008	1/17/2008	\$2,000.00	\$2,000.00	Chase	1/17/2008	2nd	8/22/2008	B W/D
A2	June	Robert C. Taylor	Agent	\$22,400.00	80.00	\$22,400.00	1/17/2008	1/17/2008	\$2,000.00	\$2,000.00	Chase	1/17/2008	2nd	8/22/2008	B W/D
A2	March	Chief Joe Chang & Amy Rindberg	Agent	\$122,400.00	80.00	\$122,400.00	1/17/2008	1/17/2008	\$2,000.00	\$2,000.00	Chase	1/17/2008	2nd	8/22/2008	B W/D
B1	March	Mark and Rhonda Price	Agent	\$22,400.00	80.00	\$22,400.00	1/17/2008	1/17/2008	\$2,000.00	\$2,000.00	Chase	1/17/2008	2nd	8/22/2008	B W/D
B1	June	Tuan Nguyen	Agent	\$22,400.00	80.00	\$22,400.00	1/17/2008	1/17/2008	\$2,000.00	\$2,000.00	Chase	1/17/2008	2nd	8/22/2008	B W/D

*the copy*

ADMINISTRATIVE COMPLAINT

EXHIBIT # 2

PAGE 2 OF 11

Case No.	Case Name	Address	City	State	Zip	Phone	Case Type	Case Status	Case Date	Case Description	Case Notes		
A1	CHM	Wanda Red	Agent	\$18,484.00	8700.00	8157,109.00	11/23/2008	12/7/2008	\$9,250.00	n/a	11/19/2008	2nd	BWD 150
A1	CHM	Carol Archer	Agent	\$19,400.00	3400.00	\$20,300.00	3/18/2008	3/21/2008	\$2,000.00	\$7,370.00	Cash	n/a	BWD 150
B1	CHM	Bamboo Kim	Agent	\$278,900.00	3700.00	\$279,600.00	1/24/2008	1/24/2008	\$2,000.00	\$11,445.00	Cash	1/22/2008	BWD 150
B1	CHM	Brenda Tichia	Agent	\$273,900.00	81.00	\$273,981.00	1/21/2008	1/21/2008	\$2,000.00	\$11,445.00	Cash	1/22/2008	BWD 150
B1	CHM	Elmer Stuck	Agent	\$215,400.00	80.00	\$215,480.00	1/22/2008	1/22/2008	\$2,000.00	\$11,445.00	Cash	1/22/2008	BWD 150
B1	CHM	Brent Woodruff	Agent	\$221,400.00	80.00	\$221,480.00	1/11/2008	1/11/2008	\$2,000.00	\$11,445.00	Cash	1/22/2008	BWD 150
A1	CHM	Lamrona Red	Agent	\$241,900.00	80.00	\$241,980.00	1/13/2008	1/13/2008	\$2,000.00	\$10,910.00	Cash	1/22/2008	BWD 150
A1	CHM	Cedelia Para	Agent	\$187,400.00	80.00	\$187,480.00	1/17/2008	1/17/2008	\$2,000.00	\$7,370.00	Cash	1/19/2008	BWD 150
B2	CHM	Norman Alton	Agent	\$187,400.00	80.00	\$187,480.00	1/17/2008	1/17/2008	\$2,000.00	\$7,370.00	Cash	1/19/2008	BWD 150
A1	CHM	Halsom Henden	Agent	\$187,400.00	80.00	\$187,480.00	1/17/2008	1/17/2008	\$2,000.00	\$7,370.00	Cash	1/19/2008	BWD 150
A1	CHM	Amy Busman	Agent	\$187,400.00	80.00	\$187,480.00	1/17/2008	1/17/2008	\$2,000.00	\$7,370.00	Cash	1/19/2008	BWD 150
B3	CHM	Marlene Ruffano	Agent	\$187,400.00	80.00	\$187,480.00	1/17/2008	1/17/2008	\$2,000.00	\$7,370.00	Cash	1/19/2008	BWD 150
B3	CHM	Edward Johnson	Agent	\$187,400.00	80.00	\$187,480.00	1/17/2008	1/17/2008	\$2,000.00	\$7,370.00	Cash	1/19/2008	BWD 150
B3	CHM	Flem Crishton	Agent	\$187,400.00	80.00	\$187,480.00	1/17/2008	1/17/2008	\$2,000.00	\$7,370.00	Cash	1/19/2008	BWD 150
A1	CHM	Wendie Bickley & Annela York	Agent	\$314,900.00	80.00	\$314,980.00	1/17/2008	1/17/2008	\$2,000.00	\$7,370.00	Cash	1/19/2008	BWD 150
B2	CHM	Allison A. Osner	Agent	\$221,900.00	80.00	\$221,980.00	1/17/2008	1/17/2008	\$2,000.00	\$7,370.00	Cash	1/19/2008	BWD 150
B2	CHM	Bianca Jara	Agent	\$187,400.00	80.00	\$187,480.00	1/17/2008	1/17/2008	\$2,000.00	\$7,370.00	Cash	1/19/2008	BWD 150
A1	CHM	Ed Harrigan	Agent	\$187,400.00	80.00	\$187,480.00	1/17/2008	1/17/2008	\$2,000.00	\$7,370.00	Cash	1/19/2008	BWD 150
B2	CHM	Migrona & Conrize Minoa	Agent	\$249,400.00	80.00	\$249,480.00	1/17/2008	1/17/2008	\$2,000.00	\$7,370.00	Cash	1/19/2008	BWD 150
A2	CHM	Andrew Emmitson	Agent	\$171,400.00	80.00	\$171,480.00	1/17/2008	1/17/2008	\$2,000.00	\$7,370.00	Cash	1/19/2008	BWD 150
B1	CHM	Julius Rosenthal	Agent	\$241,900.00	80.00	\$241,980.00	1/17/2008	1/17/2008	\$2,000.00	\$7,370.00	Cash	1/19/2008	BWD 150
A1	CHM	Linda K. Bourdov	Agent	\$219,900.00	80.00	\$219,980.00	1/17/2008	1/17/2008	\$2,000.00	\$7,370.00	Cash	1/19/2008	BWD 150
B1	CHM	Astoria Luna	Agent	\$187,400.00	80.00	\$187,480.00	1/17/2008	1/17/2008	\$2,000.00	\$7,370.00	Cash	1/19/2008	BWD 150
C1	CHM	Ryan Lester	Agent	\$233,400.00	80.00	\$233,480.00	1/17/2008	1/17/2008	\$2,000.00	\$7,370.00	Cash	1/19/2008	BWD 150
B1	CHM	Ryan Wetshnick	Agent	\$249,400.00	80.00	\$249,480.00	1/17/2008	1/17/2008	\$2,000.00	\$7,370.00	Cash	1/19/2008	BWD 150
B1	CHM	Jerry M. Hanley	Agent	\$249,400.00	80.00	\$249,480.00	1/17/2008	1/17/2008	\$2,000.00	\$7,370.00	Cash	1/19/2008	BWD 150
B1	CHM	Nicolita Bullock	Agent	\$249,400.00	80.00	\$249,480.00	1/17/2008	1/17/2008	\$2,000.00	\$7,370.00	Cash	1/19/2008	BWD 150
A1	CHM	Judith A. Imberg	Agent	\$233,400.00	80.00	\$233,480.00	1/17/2008	1/17/2008	\$2,000.00	\$7,370.00	Cash	1/19/2008	BWD 150
B1	CHM	Beverly Thomas	Agent	\$174,400.00	80.00	\$174,480.00	1/17/2008	1/17/2008	\$2,000.00	\$7,370.00	Cash	1/19/2008	BWD 150
B1	CHM	Pythia Daulton	Agent	\$241,900.00	80.00	\$241,980.00	1/17/2008	1/17/2008	\$2,000.00	\$7,370.00	Cash	1/19/2008	BWD 150
A2	CHM	KR & Sonics Brennan	Agent	\$187,400.00	80.00	\$187,480.00	1/17/2008	1/17/2008	\$2,000.00	\$7,370.00	Cash	1/19/2008	BWD 150
A2	CHM	Jerry J. Bous & Heather L.	Agent	\$187,400.00	80.00	\$187,480.00	1/17/2008	1/17/2008	\$2,000.00	\$7,370.00	Cash	1/19/2008	BWD 150
B1	CHM	Stephen J. Gindra and Linda W. Gindra	Agent	\$174,400.00	80.00	\$174,480.00	1/17/2008	1/17/2008	\$2,000.00	\$7,370.00	Cash	1/19/2008	BWD 150
B1	CHM	John Stasov	Agent	\$174,400.00	80.00	\$174,480.00	1/17/2008	1/17/2008	\$2,000.00	\$7,370.00	Cash	1/19/2008	BWD 150
A2	CHM	Joseph Bracco	Agent	\$241,900.00	80.00	\$241,980.00	1/17/2008	1/17/2008	\$2,000.00	\$7,370.00	Cash	1/19/2008	BWD 150
A2	CHM	Fredric A. Mertes	Agent	\$187,400.00	80.00	\$187,480.00	1/17/2008	1/17/2008	\$2,000.00	\$7,370.00	Cash	1/19/2008	BWD 150

Explains At Town Center

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Replanned At Town Center

ID	Name	Address	City	State	Zip	Phone	Alt Phone	Occupation	Education	Marital Status	Age	Income	Net Worth	Assets	Liabilities	Debt	Other Info
A1	John	Anthony Leonard Jr.															
B1	John	Gregory Monk															
A1	John	Douglas Arnold															
A2	Marcia	Rita Brown & Rhonda Robbins															
A3	John	Adam Howard & John Fitzgerald															
A1	Chris	Cynthia & Abdelmalik Elmal															
B1	Marcia	Brandy/Andy															
B1	John	Edward Zah															
B1	John	Fred Fiedrichs															
B1	John	Camryn Barry															
B1	John	Mary Park															
A3	John	Ryan Boyd															
C1	Camryn	Christopher Perkins															
B1	John	Byron Amant, Stephen & Cheryl															
A1	Marcia	Regina Moshinova															
A3	Chris	Maria & Danielle Berry															
A1	Marcia	Walter Lazarus															
B1	John	Marcia Christian															
B1	John	Seth Kimball															
A3	Chris	Norval Smikle															
B1	John	Albert Barbi Jr.															
A3	Marcia	Sally Mesnick															
A3	Chris	Mario Lujan															
B1	John	Robert Zanke															
B1	John	Geoffrey K. Blum															
C1	John	James Rhodes & Raybin Inc															
B3	Chris	Remora Samuel & Shalin Mevri															
A3	Chris	Lang Zhao															
A1	Camryn	Michael Benedetti															
B2	John	Chidreya Linder															
A1	House	Berrow Rahny															
A1	House	Joelmyan															
B3	John	Christopher Smith															
A1	Marcia	Thomas McVey															
A1	Marcia	Therdy & Mary Smith															
B3	John	Carlos Redmond															
B3	John	James Williams															

ADMINISTRATIVE COMPLAINT

EXHIBIT # 1

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Expendable At Town Center

A1	John	Dev Matheson	Agent	\$16,400.00	\$0.00	\$216,400.00	11/10/2006	11/26/2006	\$2,000.00	\$0.00	Chase	1/11/2006	2nd	11/27/2006				
A1	John	Dev Matheson	Agent	\$16,400.00	\$0.00	\$216,400.00	11/10/2006	11/26/2006	\$2,000.00	\$0.00	Chase	1/11/2006	2nd	11/27/2006				
B1	John	Andrew Laveola	Agent	\$179,400.00	\$0.00	\$399,400.00	11/10/2006	11/26/2006	\$2,000.00	\$0.00	Chase	11/26/2006	Primary	11/27/2006			F	
A1	John	Christine Isardorf	Internal	\$179,400.00	\$0.00	\$179,400.00	11/26/2006	12/27/2006	\$2,000.00	\$0.00	Chase	12/26/2006	2nd	11/27/2006				
B1	John	Richard & Beverly Bases	Agent	\$187,400.00	\$0.00	\$187,400.00	11/10/2006	11/26/2006	\$2,000.00	\$0.00	Apple Mortgage	3/17/2006	Investor	11/27/2006				
A1	John	Suzanna Stanley	Agent	\$178,400.00	\$0.00	\$178,400.00	11/10/2006	11/26/2006	\$2,000.00	\$0.00	Chase	1/10/2006	Investor	11/27/2006				
A2	German	H.L. & Patricia Woodruff	Driver	\$399,800.00	\$700.00	\$399,800.00	4/7/2006	4/7/2006	\$2,000.00	\$18,188.50	Webcor	4/10/2006	2nd	11/23/2006				
B2	Marla	Phillip Cooper	Agent	\$399,800.00	\$0.00	\$399,800.00	2/3/2006	2/3/2006	\$2,000.00	\$18,648.00	Chase	3/20/2006	Primary	3/22/2006				
A1	John	Champion LLC	Agent	\$178,400.00	\$0.00	\$178,400.00	11/10/2006	11/26/2006	\$2,000.00	\$0.00	Webcor	1/27/2006	2nd	11/27/2006				
B1	John	Ryan Foster	Agent	\$394,900.00	\$700.00	\$394,900.00	11/20/2006	12/18/2006	\$2,000.00	\$18,742.00	Webcor	4/10/2006	2nd	11/23/2006				
C1	John	Ford Hakim	Internal	\$18,400.00	\$700.00	\$18,400.00	11/14/2006	11/24/2006	\$2,000.00	\$11,210.00	Countrywide	2/1/2006	2nd	11/27/2006				
B3	John	Liane Hakim	Agent	\$23,900.00	\$700.00	\$23,900.00	11/14/2006	11/24/2006	\$2,000.00	\$10,684.00	Countrywide	2/1/2006	Investor	11/27/2006				
B1	John	Dan Masthart	Internal	\$254,900.00	\$0.00	\$254,900.00	11/10/2006	11/26/2006	\$2,000.00	\$10,742.00	Amesa Mortgage	1/27/2006	2nd	11/27/2006				
A1	John	Russell Castards	Agent	\$178,400.00	\$0.00	\$178,400.00	11/10/2006	11/26/2006	\$2,000.00	\$0.00	Residential 1st	1/10/2006	2nd	11/27/2006				
B3	John	Timothy Devers	Internal	\$168,400.00	\$7,000.00	\$168,400.00	11/23/2006	12/27/2006	\$2,000.00	\$10,770.00	Countrywide	12/27/2006	Primary	12/28/2006				
E1	John	Greg Smith	Internal	\$148,400.00	\$300.00	\$148,400.00	12/17/2006	1/12/2007	\$2,000.00	\$0.00	Bank United	12/27/2006	Investor	12/28/2006				
E1	John	Dan Alan Dumas/Rebecca Loring Trice	Driver	\$128,400.00	\$7,141.00	\$128,400.00	11/26/2006	2/7/2007	\$2,000.00	\$2,870.00	Bank United	1/26/2006	2nd	11/27/2006				
A1	John	Scott Simmons	Agent	\$173,400.00	\$300.00	\$173,400.00	11/10/2006	11/26/2006	\$2,000.00	\$0.00	Chase	11/22/2006	2nd	11/27/2006				
A1	German	Ron Reesler	Internal	\$177,400.00	\$300.00	\$177,400.00	11/10/2006	11/26/2006	\$2,000.00	\$0.00	Chase	1/10/2006	2nd	11/27/2006				
B2	John	David Thompson	Internal	\$208,500.00	\$0.00	\$208,500.00	11/10/2006	11/26/2006	\$2,000.00	\$0.00	Cash	11/10/2006	Investor	11/27/2006				
A1	John	AI Investments LLC	Internal	\$198,400.00	\$0.00	\$198,400.00	11/23/2006	11/27/2006	\$2,000.00	\$7,680.00	Cash	11/27/2006	2nd	11/27/2006				
A1	John	Bobby Bellvue	Internal	\$228,400.00	\$0.00	\$228,400.00	11/10/2006	11/26/2006	\$2,000.00	\$0.00	Cash	11/10/2006	Primary	11/27/2006				
A1	German	Marc Slensky	Agent	\$190,400.00	\$0.00	\$190,400.00	11/23/2006	11/27/2006	\$2,000.00	\$7,680.00	Chase	1/10/2006	2nd	11/27/2006				
B2	John	Patry Bedd & Joseph Keney	Agent	\$290,400.00	\$700.00	\$290,400.00	11/20/2006	12/11/2006	\$2,000.00	\$15,050.00	Builtrust	1/10/2006	2nd	11/27/2006				
A1	John	Nutriz Jones & Johnnie Smith	Internal	\$184,400.00	\$0.00	\$184,400.00	11/10/2006	11/26/2006	\$2,000.00	\$7,720.00	Cash	10/24/2006	2nd	11/27/2006				
A3	Marla	Jeanne Berbe	Internal	\$312,400.00	\$700.00	\$312,400.00	11/10/2006	11/26/2006	\$2,000.00	\$0.00	Cash	11/10/2006	2nd	11/27/2006				
A3	John	Kath Paris	Agent	\$187,400.00	\$2,200.00	\$187,400.00	11/10/2006	11/26/2006	\$2,000.00	\$2,370.00	Wells Fargo	11/23/2006	Investor	10/23/2006				
A1	German	Rossiter, Inc	Internal	\$192,400.00	\$100.00	\$192,400.00	11/14/2006	11/24/2006	\$2,000.00	\$7,180.00	Cash	11/10/2006	Investor	10/23/2006				
B2	John	Norm Jaber	Agent	\$309,800.00	\$0.00	\$309,800.00	3/7/2006	4/12/2006	\$2,000.00	\$12,170.00	Chase	12/1/2006	Primary	10/23/2006				
B1	John	Madam Jean	Agent	\$204,900.00	\$0.00	\$204,900.00	11/10/2006	11/26/2006	\$2,000.00	\$13,948.00	American Mortgage	3/29/2006	Primary	10/23/2006				
B1	John	Den Ann Demore/Rebecca Loring Trice	Agent	\$303,900.00	\$4,700.00	\$303,900.00	11/10/2006	11/26/2006	\$2,000.00	\$13,380.00	Western	4/9/2006	Investor	10/23/2006				
B3	John	Andres and Linda Martinez	Internal	\$382,500.00	\$0.00	\$382,500.00	11/14/2006	11/24/2006	\$2,000.00	\$11,148.00	Chase	11/20/2006	Investor	10/23/2006				
B1	John	Joshua Tonge	Internal	\$372,400.00	\$0.00	\$372,400.00	11/20/2006	12/18/2006	\$2,000.00	\$0.00	Chase	11/20/2006	Primary	10/23/2006				
B1	John	Amy Wunderlick	Agent	\$339,900.00	\$700.00	\$339,900.00	11/10/2006	11/26/2006	\$2,000.00	\$0.00	Bank of America	12/7/2006	Primary	10/23/2006				
B1	John	He Kl Ludwig	Agent	\$189,400.00	\$0.00	\$189,400.00	11/23/2006	12/6/2006	\$2,000.00	\$0.00	Bank of America	12/7/2006	Primary	10/23/2006				
C1	John	Robert Somers	Agent	\$329,800.00	\$0.00	\$329,800.00	11/10/2006	11/26/2006	\$2,000.00	\$10,688.00	Fidelity	11/20/2006	Primary	10/23/2006				
B1	John	Lori Starling	Agent	\$312,900.00	\$700.00	\$312,900.00	11/17/2006	12/2/2006	\$2,000.00	\$11,148.00	Chase/Equity	12/1/2006	2nd	10/18/2006				
A1	Marla	Jean Monestime	Agent	\$189,400.00	\$0.00	\$189,400.00	12/13/2006	12/21/2006	\$2,000.00	\$7,620.00	Chase	1/10/2006	Investor	10/17/2006				

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Explained At Town Center

Case #	Case Name	Case Type	Amount	Start Date	End Date	Due Date	Notes
A33	CHP Daniel Bueche & Loan Lessor	Intermt	\$192,400.00	1/7/2004	1/27/2004	1/27/2004	89,870.00
A1	Morris Joshua Shapiro	Agent	\$192,400.00	3/20/04	1/27/2004	1/27/2004	89,870.00
B18	Morris David Robinson	Intermt	\$222,400.00	3/20/04	1/27/2004	1/27/2004	89,870.00
A2	Morris Vivienne Ip	Agent	\$197,400.00	1/14/2004	1/27/2004	1/27/2004	89,870.00
A2	CHW Adria Nader	Agent	\$197,400.00	8/20/04	1/27/2004	1/27/2004	89,870.00
B18	CHW Arca Dominguez	Agent	\$270,400.00	8/20/04	1/27/2004	1/27/2004	89,870.00
B18	CHW Clarence O. Wilkerson Jr. & Joyce Wilkerson	Intermt	\$270,400.00	8/20/04	1/27/2004	1/27/2004	89,870.00
A36	Common Andrew Korman & Tammy Korman	Intermt	\$307,400.00	8/20/04	1/27/2004	1/27/2004	89,870.00
A2	Morris Jorge D. Ruffinano	Agent	\$307,400.00	8/20/04	1/27/2004	1/27/2004	89,870.00
B18	Morris Derek Wynn	Agent	\$329,400.00	8/20/04	1/27/2004	1/27/2004	89,870.00
B18	CHW Justin Frishugh	Intermt	\$327,400.00	8/20/04	1/27/2004	1/27/2004	89,870.00
C18	Morris Ramsey & Sally Galun	Work-sh	\$329,400.00	8/20/04	1/27/2004	1/27/2004	89,870.00
B3	House Charles Barun	Agent	\$282,400.00	8/20/04	1/27/2004	1/27/2004	89,870.00
A2	Morris Grand Chikovy	Agent	\$282,400.00	8/20/04	1/27/2004	1/27/2004	89,870.00
A1	Morris Jennifer Casareto	Agent	\$237,900.00	8/20/04	1/27/2004	1/27/2004	89,870.00
A18	CHW Daubidovna In Man	Intermt	\$192,400.00	8/20/04	1/27/2004	1/27/2004	89,870.00
B3	Morris Martin Calabrese	Intermt	\$192,400.00	8/20/04	1/27/2004	1/27/2004	89,870.00
B3	Morris Amydwell Ledin	Intermt	\$207,900.00	8/20/04	1/27/2004	1/27/2004	89,870.00
A1	Morris Mary Vilam & Josie Cadet	Agent	\$182,400.00	8/20/04	1/27/2004	1/27/2004	89,870.00
A1	Morris Wm Gang Ban & Peter H. Wong	Agent	\$182,400.00	8/20/04	1/27/2004	1/27/2004	89,870.00
B3	CHW Grand Silvia	Agent	\$282,400.00	8/20/04	1/27/2004	1/27/2004	89,870.00
B3	Morris Madeline Bernante	Agent	\$232,400.00	8/20/04	1/27/2004	1/27/2004	89,870.00
A1	Morris Frank Tonello	Agent	\$182,400.00	8/20/04	1/27/2004	1/27/2004	89,870.00
A1	Morris Vito Francis Calabrese	Intermt	\$182,400.00	8/20/04	1/27/2004	1/27/2004	89,870.00
B3	CHW Stephen F. Crane	Intermt	\$227,900.00	8/20/04	1/27/2004	1/27/2004	89,870.00
A1	Morris Charles G. & Mary Y. Chai	Agent	\$182,400.00	8/20/04	1/27/2004	1/27/2004	89,870.00
B18	Morris Chris Freedman	Intermt	\$232,400.00	8/20/04	1/27/2004	1/27/2004	89,870.00
B18	Morris Demitrius Hernandez	Agent	\$182,400.00	8/20/04	1/27/2004	1/27/2004	89,870.00
B3	Morris Stephen Hris	Agent	\$227,900.00	8/20/04	1/27/2004	1/27/2004	89,870.00
A1	Morris Armando A. Lopez Rivera	Agent	\$182,400.00	8/20/04	1/27/2004	1/27/2004	89,870.00
B3	CHW Cynthia J. Roberts	Agent	\$172,400.00	8/20/04	1/27/2004	1/27/2004	89,870.00
B3	CHW Olga Gutierrez	Agent	\$232,400.00	8/20/04	1/27/2004	1/27/2004	89,870.00
A1	Common Christopher R. Bantiv	Agent	\$227,900.00	8/20/04	1/27/2004	1/27/2004	89,870.00
A1	Common Lori Frittkoson	Agent	\$177,400.00	8/20/04	1/27/2004	1/27/2004	89,870.00
B18	House Nicholas Owens	Intermt	\$222,400.00	8/20/04	1/27/2004	1/27/2004	89,870.00
C1	House Cecilia Heuser and George Heuser	Agent	\$172,400.00	8/20/04	1/27/2004	1/27/2004	89,870.00
B3	CHW Geraldine Cury	Intermt	\$241,900.00	8/20/04	1/27/2004	1/27/2004	89,870.00
B18	CHW Suzanne Egan	Intermt	\$227,900.00	8/20/04	1/27/2004	1/27/2004	89,870.00
A1	CHW Jessica Fulzer	Agent	\$187,400.00	8/20/04	1/27/2004	1/27/2004	89,870.00
B3	Morris Adelval & Conchita Strati	Agent	\$292,900.00	8/20/04	1/27/2004	1/27/2004	89,870.00

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Explained At Town Center

E1	Maria	Patricia S. Ryan	Agent	\$185,400.00	\$200.00	\$185,200.00	12/23/2006	1/17/2008	\$2,000.00	\$1,770.00	Chase	1/18/2008	2nd	10/21/2008	B WID
E1	CHR	Michael Weisser	Agent	\$185,400.00	\$0.00	\$185,400.00	12/23/2006	1/17/2008	\$2,000.00	\$1,770.00	Countrywide	1/18/2008	Primary	07/23/2008	B
A2	Jude	Douglas Crowell	Agent	\$178,400.00	\$800.00	\$177,600.00	11/16/2006	1/18/2008	\$2,000.00	\$2,000.00	Chase	2/17/2008	Investor	04/23/2008	P WID 14.00
A2	Jude	Elina Wondrich	Agent	\$180,400.00	\$200.00	\$180,200.00	11/23/2006	1/18/2008	\$2,000.00	\$2,000.00	CTI	1/28/2008	2nd	07/23/2008	P WID
A2	Jude	Empire Real Estate Development	Agent	\$239,400.00	\$4,700.00	\$234,700.00	12/14/2006	1/17/2008	\$2,000.00	\$2,000.00	Chase	2/12/2008	Primary	07/23/2008	T10 WID P
A2	Jude	CR Properties LLC	Agent	\$207,400.00	\$5,000.00	\$202,400.00	12/23/2006	1/17/2008	\$2,000.00	\$2,000.00	Chase	2/12/2008	2nd	07/23/2008	B WID
A2	Maria	Reynold Basue	Agent	\$207,400.00	\$800.00	\$206,600.00	12/23/2006	1/17/2008	\$2,000.00	\$2,000.00	Wonder Agents	4/24/2008	Primary	10/24/2008	B WID
A1	CHR	Barry Cain	Agent	\$192,400.00	\$800.00	\$191,600.00	07/23/2006	4/18/2008	n/a	n/a	Countrywide	4/18/2008	2nd	04/23/08	B WID
B2	Maria	Nihar A Sax Vv	FTU	\$313,900.00	\$0.00	\$313,900.00	07/17/2006	07/23/2008	\$2,000.00	\$13,800.00	Countrywide	2/27/2008	Primary	10/24/2008	P
A1	Jude	Gregory Nydek	Agent	\$193,400.00	\$0.00	\$193,400.00	11/18/2006	12/4/2008	\$2,000.00	\$7,470.00	Arbanan Mort	11/21/2008	2nd	10/24/2008	P
A3	Maria	Jean C. La Casala	Agent	\$198,400.00	\$700.00	\$197,700.00	11/12/2006	11/27/2008	\$2,000.00	\$7,350.00	HomeBanc	1/07/2008	2nd	04/23/2008	B WID
A3	CHR	Barbara Chesney & David A. Chesney	Investor	\$200,400.00	\$700.00	\$199,700.00	11/14/2006	11/23/2008	\$2,000.00	\$7,350.00	Chase	11/22/2008	Investor	10/24/2008	B WID 3.50
A1	Maria	Ed Burdell	Investor	\$177,400.00	\$274.00	\$177,126.00	04/28/2006	11/28/2008	\$2,000.00	\$4,050.00	Chase	11/22/2008	Investor	10/24/2008	B WID 3.50
B2	Maria	Maria & Tra Yeaske	Investor	\$240,200.00	\$700.00	\$239,500.00	11/12/2006	11/28/2008	\$2,000.00	\$10,440.00	Countrywide	1/12/2008	2nd	04/23/08	F WID
B1	CHR	Karen and Philip Bonness, Kimberly Susan & Pamela Deben	Agent	\$203,900.00	\$700.00	\$203,200.00	1/07/2006	1/27/2008	\$2,000.00	\$13,900.00	Countrywide	04/23/08	2nd	04/23/08	\$700 B WID
B1	CHR	Toy Burdington	Agent	\$207,900.00	\$0.00	\$207,900.00	11/12/2006	11/28/2008	\$2,000.00	\$11,200.00	Wells Fargo	1/07/2008	Primary	07/23/2008	\$300 F WID
B1	Jude	L. William & Dorothy Schroeder	Investor	\$204,900.00	\$7,000.00	\$197,900.00	11/12/2006	12/23/2008	\$2,000.00	\$10,200.00	Chase	11/22/2008	2nd	04/23/08	\$ 31,700 WID
B1	CHR	Laila & Abdi Nasseh	Agent	\$278,900.00	\$700.00	\$278,200.00	02/23/2006	2/23/2008	\$2,000.00	\$11,900.00	Countrywide	4/18/2008	Investor	10/23/2008	F 3.50 WID
B1	Maria	Fernando & Lita Rojas	Agent	\$273,900.00	\$0.00	\$273,900.00	2/17/2006	2/17/2008	\$2,000.00	\$11,900.00	Dutchman	07/23/2008	Investor	10/23/2008	B
CI	Jude	Phillip & Janis Beck	Agent	\$384,400.00	\$0.00	\$384,400.00	11/14/2006	11/28/2008	\$2,000.00	\$13,200.00	Team Lending Group	11/22/08	2nd	07/23/2008	B
B1	Jude	Michael J. Johnson	Agent	\$325,900.00	\$0.00	\$325,900.00	11/12/2006	11/27/2008	\$2,000.00	\$9,750.00	AmBank	2/2/08	2nd	10/23/2008	F
A1	Maria	Key M. Gross	Agent	\$195,400.00	\$0.00	\$195,400.00	12/18/2006	12/23/2008	\$2,000.00	\$7,770.00	Countrywide	1/23/08	Investor	10/23/2008	F
A3	Jude	Rio Gross	Agent	\$199,400.00	\$0.00	\$199,400.00	1/11/2006	11/23/2008	\$2,000.00	\$7,250.00	Team Lending Group	11/23/08	2nd	04/23/08	F
A3	Maria	Garron Bouwell	Agent	\$204,400.00	\$700.00	\$203,700.00	07/12/2006	07/23/2008	\$2,000.00	n/a	AmBank	07/23/08	Primary	10/27/2008	WID F
A1	Maria	Antero & Frisella Colaneri	Agent	\$193,400.00	\$900.00	\$192,500.00	11/12/2006	12/4/2008	\$2,000.00	\$11,250.00	AmBank	n/a	Investor	10/24/2008	WID F
B1	CHR	Kurt Messardt	Agent	\$205,900.00	\$0.00	\$205,900.00	11/12/2006	12/4/2008	\$2,000.00	\$11,250.00	AmBank	1/2/08	2nd	10/24/2008	B
A2	CHR	Kurt & Sandy Parsons	Agent	\$200,400.00	\$0.00	\$200,400.00	12/17/2006	12/18/2008	\$2,000.00	\$2,820.00	USAA	12/18/08	2nd	10/24/2008	F
B1	CHR	David Weathers III and James Tate	Agent	\$270,400.00	\$0.00	\$270,400.00	11/27/2006	12/12/2008	\$2,000.00	\$11,820.00	Bank of America	12/18/08	2nd	10/24/2008	B
B1	CHR	Azra Blake	Agent	\$270,400.00	\$0.00	\$270,400.00	11/27/2006	12/12/2008	\$2,000.00	\$11,820.00	Bank of America	12/18/08	Primary	10/24/2008	B
A1	Jude	Loel Toranzo	Agent	\$204,400.00	\$900.00	\$203,500.00	07/23/2006	07/23/2008	\$2,000.00	n/a	Home Mortgage	07/23/08	Investor	10/24/2008	B WID
B1	Maria	Mariam Alshadawi	Agent	\$203,400.00	\$0.00	\$203,400.00	07/23/2006	07/23/2008	\$2,000.00	\$12,170.00	First Loan Group	04/10/08	2nd	10/24/2008	B
B1	Jude	David Timmsbaum	Agent	\$203,400.00	\$0.00	\$203,400.00	12/22/2006	02/17/2008	\$2,000.00	\$11,170.00	Chase	2/14/08	2nd	10/24/2008	B
CI	Jude	Leah Frecht and Marc Zinder	Investor	\$207,400.00	\$0.00	\$207,400.00	11/11/2006	11/23/2008	\$2,000.00	\$10,870.00	Chase	2/14/08	2nd	10/24/2008	B
B1	CHR	Leslie & Patrick Keller	Agent	\$271,900.00	\$7,000.00	\$264,900.00	11/12/2006	11/23/2008	\$2,000.00	\$11,800.00	Bank of America	11/23/08	2nd	10/24/2008	Hardwood WID
A1	Jude	E. Oryan & Jeremy Sandler	Agent	\$193,400.00	\$3,100.00	\$190,300.00	11/22/2006	12/7/2008	\$2,000.00	\$7,420.00	Chase	11/23/08	2nd	10/24/2008	WID T10 B
A1	CHR	Robert Casper	Agent	\$192,400.00	\$900.00	\$191,500.00	1/14/2006	1/14/2008	n/a	n/a	Chase	04/08	Investor	10/24/2008	WID F
B2	CHR	Kidream Builders LLC	Agent	\$205,900.00	\$700.00	\$205,200.00	11/14/2006	12/18/2008	\$2,000.00	\$11,200.00	Chase	04/08	Investor	10/24/2008	WID F
A1	CHR	Maria & Caryn Daviss	Agent	\$205,900.00	\$700.00	\$205,200.00	11/14/2006	12/18/2008	\$2,000.00	\$11,200.00	Chase	04/08	Investor	10/24/2008	WID F

Explained At Town Center

A1	June	Daniel & Linda Lawson	Interest	\$112,400.00	\$100.00	\$112,300.00	1/29/2006	1/29/2006	\$9,630.00	N/A	Chase	1/10/06	Investor	1/23/2006	\$488 W/D
A1	March	Green Shiner	Absent	\$240,900.00	\$2.00	\$240,900.00	1/11/2006	1/11/2006	\$2,000.00	\$10,645.00	Chase	1/10/06	2nd	1/23/2006	\$488 W/D
A1	March	Melinda J. Frisora	Absent	\$192,400.00	\$20.00	\$192,380.00	2/19/2006	2/19/2006	\$2,000.00	\$5,071.00	Investor	1/23/2006	Investor	1/23/2006	B W/D
A1	March	Douglas Sandstead, Dina Sgt Paul Sandstead	Interest	\$172,400.00	\$2.00	\$172,400.00	1/11/2006	1/11/2006	\$2,000.00	N/A	Chase	1/10/06	Investor	1/23/2006	B W/D
B3	June	B. Lynn Ford, Ernest Edward Ford Jr, Brenda Van Buren	Interest	\$238,400.00	\$2.00	\$238,400.00	1/11/2006	1/11/2006	\$2,000.00	\$10,444.00	Bank of America	6/2/06	Investor	1/23/2006	\$380 W/D
B3	June	Steven Elliott	Absent	\$224,900.00	\$700.00	\$224,200.00	1/11/2006	1/11/2006	\$2,000.00	\$10,444.00	Chase	1/10/06	Investor	1/23/2006	\$380 W/D
A1	June	Christopher Henry	Absent	\$192,400.00	\$2.00	\$192,400.00	1/27/2006	1/27/2006	\$2,000.00	\$7,450.00	Chase	1/10/06	2nd	1/23/2006	
A1	March	Robert Phoenix	Absent	\$192,400.00	\$900.00	\$191,500.00	2/18/2006	2/18/2006	\$2,000.00	\$1,071.00	Investor	1/23/2006	Investor	1/23/2006	B W/D
B3	CHT	Olivia Fishburn	Absent	\$288,900.00	\$2.00	\$288,900.00	2/18/2006	2/18/2006	\$2,000.00	\$1,071.00	Investor	1/23/2006	Investor	1/23/2006	B W/D
A1	March	Michael J. Frisora	Absent	\$192,400.00	\$800.00	\$191,600.00	2/18/2006	2/18/2006	\$2,000.00	\$1,071.00	Investor	1/23/2006	Investor	1/23/2006	B W/D
B1B	June	James Rivers	Absent	\$242,400.00	\$2.00	\$242,400.00	2/16/2006	2/16/2006	\$2,000.00	\$9,071.00	Investor	1/23/2006	Investor	1/23/2006	
A1	June	Francine Calhoun	Absent	\$180,400.00	\$2.00	\$180,400.00	1/23/2006	1/23/2006	\$2,000.00	\$12,870.00	Chase	1/10/06	Investor	1/23/2006	
B3B	March	Artha Norman	Absent	\$278,900.00	\$2.00	\$278,900.00	1/23/2006	1/23/2006	\$2,000.00	\$7,821.00	The Landings	1/19/2006	Primary	1/23/2006	
A1	June	Cher G. & May Y. Chan	Absent	\$192,400.00	\$2.00	\$192,400.00	2/20/2006	2/20/2006	\$2,000.00	\$11,548.00	Country	1/23/2006	2nd	1/23/2006	P 340 W/D
A2	March	Michael Bai	Absent	\$192,400.00	\$200.00	\$192,200.00	1/18/2006	1/18/2006	\$2,000.00	\$7,450.00	Global Mortgage	1/23/2006	Investor	1/23/2006	\$488 W/D
B3	House	Mark Kolo	Absent	\$238,400.00	\$2.00	\$238,400.00	1/18/2006	1/18/2006	\$2,000.00	\$7,870.00	Prudential Home Lending	1/23/2006	2nd	1/23/2006	B \$488 W/D

40,879,788

Handwritten initials/signature.

Cancellations  
Esplanade At Town Center

Unit #	Owner Name	Property Type	Notes
414	A2 Patrick Sessions	House	
415	A2 Jason Sessions	House	
208	B1 Michael C. Marabell	Cliff	X
233	A3 Susanne Stephens	Marcia	X
310	E1 Joel Smeenge	Cliff	X
408	B2 Ryuchi Tran	Cliff	X
331	A1 Stephen Bravo	Cliff	X
313	B1S William P. Stepaniak	Cliff	X
412	A2 Sandra W. Smith	Julie	X
140	A3 Kether & Stephens		X
318	A1 Leslie Pinciaro	Barb	X
433	A3S Lang Shimm	Cliff	X
301	B1S Perkins	Marcia	X
140	A3 Stephens	Marcia	X
127	B1 Elaine Wunderlich	Julie	X
139	B1 Maciel Kosowski	Cliff	X
458	B2S Astral Arian	Marcia	X
125	B3 Michael Beaujeu	Julie	X
427	B1S Neil Frauenheim	Julie	X
244	C1 Jason Ergan	Marcia	X
131	A1 Donald Smith	Julie	X
149	A1 Mary Cellino	Julie	X
418	A1 Michael Guismo	Julie	X
115	A2 Mark Aurajo	Cliff	X
118	A1 Allison Lavigne	Julie	X
338	A2 Wunderlich, Amy	Julie	X
338	A2 King, Carl	Cliff	X
428	B1S Tom Miklas	Cliff	X
225	B3 William Bernhardt	Julie	X
323	B1S Jennifer Genus	Marcia	X
252	A1 House of Cards LLC	Cliff	X
408	B2S Ray Natour	Julie	X
225	B3 Dennis & Judith Church	Cliff	X
253	B1 William & Susan Genshew	Marcia	X
336	A2 Nathaniel Benson	Cliff	X
351	B2 Andrew Blahay	Julie	X
349	B1S Perap & Krivski	Marcia	X
310	E1 Teresa Clark	Marcia	X

ADMINISTRATIVE COMPLAINT

EXHIBIT # 1  
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Cancellations  
Esplanade At Town Center

152	A1	Donald Seauville	Marcia																X	Wouldn't use enough
347	A1	Alan Magluta	Marcia																X	numbers don't work for investment
417	B2S	Ann & Noorah Azeez	Marcia																X	did not give reason
344	C1	Sivash & Pouranikoti	Marcia																	Need cancellation papers
351	B2S	Siela Walton	Marcia																	Bought other Unit #225
161	A1	Nanka Kerdic	Julie																X	change in personal finances
153	A1	John Cheliff	Marcia																X	got in over their head
253	A1	Denise Cheliff	Marcia																X	got in over their head
209	E1	Amede Cappadona	Julie																X	change in personal finance
252	A1	Phillip Brutus	Marcia																X	Change in personal finance
125	B3T	Edward Durand	Julie																X	got in over their head
155	B3	Debbie Austin	Cliff																X	got in over their head
121	A1	Aaron Weasner	Julie																X	change in personal finance
301	B1	Karen & Phillip Bonasso	Cliff																X	Change in personal finance
118	A1	Stephanie Flack	Cliff																X	Change in personal finance
449	B2S	Wm & Marcia Freeman	Julie																X	Not enough time to run numbers
452	A1	Barry Cohn	Cliff																X	over all deal economics
457	A1	Barry Cohn	Cliff																X	deceased flooplan not available
123	B1	Clinton & Kimberly Quin	Marcia																X	too expensive for budget
117	B2	Clinton & Kimberly Quin	Marcia																X	numbers don't work for investment
457	A1	Marcel Raffiengo	Cliff																X	over extended
127	B1	Alpo Cooco	Julie																X	over extended
301	B1S	Johnny & Cynthia Jada	Cliff																X	changed name to Daughter Mandy Quin
147	A1	James & Melissa Cecil	Marcia																X	changed name to Daughter Amy Quin
324	B1S	Richard Plourde	Cliff																X	transferred to Unit 153
344	C1	Kristine Fleming	Julie																X	transferred to Unit 153
118	A1	Amy Sussman	Cliff																X	transferred to Unit 153
433	A3S	Daniel Johnston	Marcia																X	transferred to Unit 152
141	A2.1	Garet Boudevell	Marcia																X	transferred to Unit 152
252	A1	Raynor & James Raffiengo	Cliff																X	wants closer to beach
257	A1	Gren Neely	Marcia																X	transferred to 433
225	B3	Siela Walton	Marcia																X	change in personal finances
442	B1S	Noor Jabber	Marcia																X	numbers don't work for investment
319	A3	Keram Abulber Hannah	Marcia																X	Unable to pay 2nd deposit
257	A1	Fernando Stancampsk	Marcia																X	switched to #322 unit
258	A1	Henry Accia	Cliff																X	switched to #322 unit
351	B2	Faycoza Weitz	Julie																X	Changed mind
434	B2	William Fuller	Cliff																X	Restrictions too strict

Wouldn't use enough  
 numbers don't work for investment  
 did not give reason  
 Need cancellation papers  
 Bought other Unit #225  
 change in personal finances  
 got in over their head  
 change in personal finance  
 Not enough time to run numbers  
 over all deal economics  
 deceased flooplan not available  
 too expensive for budget  
 numbers don't work for investment  
 over extended  
 changed name to Daughter Mandy Quin  
 changed name to Daughter Amy Quin  
 transferred to Unit 153  
 transferred to Unit 153  
 transferred to Unit 152  
 wants closer to beach  
 transferred to 433  
 change in personal finances  
 numbers don't work for investment  
 Unable to pay 2nd deposit  
 switched to #322 unit  
 Changed mind  
 Restrictions too strict  
 Numbers don't work for investment  
 Could not qualify  
 defaulted contract - no 2nd deposit



Division of Real Estate

Attn: David Gorson

Re: Coates/Bugg

I am responding to your letter dated October 24, 2007.

(Ref 1.) I worked in the sales office for Esplanade at Town Center with Mr. Cliff Coates from November of 2005 to approx May of 2006. I was informed at my start on the project that Mr. Coates was a salaried employee of Lifestyles and his duties in the sales office would be limited to those of a paid employee.

(Ref 2.) While I worked in the sales office during November of 2005 to May of 2006 with both Cliff Coates and Marcia Creviston we serviced a large number of customers. We had a priority buyers list that included approximately 2,500 individuals interested in our project. Appointments were made on a daily basis and it was not uncommon for any one agent/employee to see 10-15 people in one business day. The following customers that you are inquiring about: Gatlin, Riccardelli, Geren, and Cooper to the best of my knowledge I do not remember specifically assisting them during the above mentioned time frame. We did conduct business in a team environment in our sales office so it would not be uncommon to assist someone else's buyer if they were helping another individual or on the day off. During our presale event I assisted approx 800-1,000 customers. I am the only original sales agent to remain on the property through the closings of the initial bulk sales. It is highly likely that at some point in their transaction I did speak with or assist the above mentioned customers. I helped every customer somewhere throughout the process.

(Ref 3.) Please see attached "Contract between Real Estate Sales Representative and Broker"

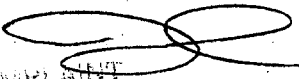
(Ref. 4) I was directed to sign the contracts for the following sales agreements: Gatlin, Riccardelli, Geren, and Cooper, as well as many other contracts.

(Ref. 5) It was verbally agreed upon between myself and my associates and approved by our director that each agent would receive a commission split of 1/3 of each sale, on all sales at "The Esplanade". Numerous agents helped out during our presale event but we were all in agreement that any sales would be divided among the agents. (Unless otherwise agreed upon and approved through our director of sales in advance.)



**Sherri Beno**  
Commission # DD604955  
Expires November 18, 2010  
Bonded Troy Pan Insurance, Inc 800-486-7019

Respectfully,

  
Julie Seago

Subscribed and sworn to before me  
this 5th day of November, 2007.



Affiant is personally known to me.

ADMINISTRATIVE COMPLAINT

EXHIBIT # 3

PAGE 1 OF

# CLIFF COATES

CONTRACT // ADVANCED SEARCH (CONTRACT)

SITE Manageware: Esplanade

<<< Search Again

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all A B C D E F G H I J K L M N O P Q R S T U V W X Y Z

Last Name	First Name	Unit	Contract Date
Gatlin	Gina	102	12/03/2005
Zahn	Charles	104	11/14/2005
Ricciardelli	Robert	112	11/19/2005
Geren	Brenda	116	01/06/2006
Copper	Phillip R	127	02/21/2006
Lazureanu	Florian	133	11/17/2005
Crowley	Lawrence E	134	12/27/2005
Gipson	Lafonda	135	12/05/2005
Radu	Monica	140	11/22/2005
Snyder	Carol	141	03/15/2006
Slavic	Elmir	144	11/23/2005
Parra	Cecilia A.	149	01/02/2006
Sussman	Amy	152	02/24/2006
affinengo	Marcelo R	153	02/07/2006
Blokker	Martina	156	12/30/2005
Emfridsson	Andreas	163	11/12/2005
Luna	Antonio	202	12/06/2005
Buiciuc	Nicoleta	206	11/29/2005
Accius	Kathleen	209	03/20/2006
Brecko	Joseph	214	11/28/2005
Marks	Fred	215	11/10/2005
Elfasi	Cynthia M.	221	04/06/2006
Perkins	Christopher	229	11/14/2005
Secu	Marius	232	11/17/2005
Lazureanu	Marius	233	11/17/2005
Kimball	Seth	235	11/11/2005
Smajic	Nedzad	236	11/14/2005
Zemke	Robert	241	11/20/2005
Zaho	Liang	245	11/20/2005
Benedetti	Michael	247	11/14/2005
Cooper	Philip	301	02/21/2006
Champion LLC		302	11/16/2005
Foster	Ryan	303	11/30/2005
Hakim	Farid	304	11/14/2005
Hakim	Liliane	305	11/14/2005
Magstadt	Dan	306	11/19/2005
Donovan	Timothy	308	11/22/2005
Salonsky	Marc	316	11/28/2005
Jones	Murray C	318	12/30/2005
Paris	Keith	320	11/15/2005
Roessler	Dawn	321	11/14/2005
Jaber	Nora	322	03/28/2006

ADMINISTRATIVE COMPLAINT

EXHIBIT # 3

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Marquez	Andres and Linda	325	11/14/2005
Tonge	Joshua	326	11/30/2005
Leung	Ho Ki	328	11/23/2005
Sommers	Robert	329	11/12/2005
Almeida	Lisa	332	11/17/2005
Buiciuc	Nicoleta	333	11/17/2005
Domeanu	Anca	338	11/22/2005
Wilkerson Jr	Clarence O.	339	12/19/2005
Kerwin	Andrew	340	11/27/2005
Raffinengo	Jorge D.	341	02/15/2006
Fitzhugh	Justin	343	11/19/2005
In Men	Davithdonyra	349	01/24/2006
Slavic	Senad	354	11/27/2005
Burnette	Glenn	365	11/15/2005
Emfridsson	Lori	402	11/12/2005
Owens	Nicholas	403	11/12/2005
Egan	Suzanne	406	11/14/2005
Fuller	Jessica	407	12/07/2005
Wessner	Michael	410	12/30/2005
Wunderlich	Elaine	412	11/29/2005
Cohn	Barry	416	03/22/2006
Chestney	Barbara	420	11/14/2005
Bonasso	Karen	423	01/06/2006
Burlingame	Troy	424	11/13/2005
Nasehi	Leslie	426	02/09/2006
Magstadt	Kurt	435	11/19/2005
Parsons	Kurt R.	436	12/01/2005
Westberry III	David	438	11/27/2005
Slavic	Azra	439	11/27/2005
Keller	Leslee	445	11/18/2005
Catapano	Robert	447	01/16/2006
Kingdom Builders Inc		448	11/16/2005
D'Vincenti	Martin S.	449	02/20/2006
Fitzhugh	Olivia	458	12/06/2005

#### Summary Statistics

**Units:** 76

**Total Sale:** \$17,036,900.00

**Avg Sale:** \$224,169.00

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ADMINISTRATIVE COMPLAINT

EXHIBIT # 3

[http://sm6.sitemanageware.com/site/contract/advsearch\\_contract2.cfm](http://sm6.sitemanageware.com/site/contract/advsearch_contract2.cfm)

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9/15/2006

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20B