

REAL ESTATE AGENCY
BEFORE THE REAL ESTATE COMMISSIONER

In the Matter of the Real Estate License of)
GLENN JOSEPH BRADLEY) STIPULATED FINAL ORDER

The Oregon Real Estate Agency (Agency) and Glenn Bradley (Bradley) do hereby agree and stipulate to the following:

FINDINGS OF FACT
AND
CONCLUSIONS OF LAW

1.

1.1 At all times mentioned herein, Bradley was licensed as a principal broker with Safe Haven, Inc. (Safe Haven). Bradley was previously supervised by Signature Real Estate, Inc.

1.2 On February 3, 2023, the Agency received a complaint from Dannie Ellingsworth (D. Ellingsworth) against Bradley. The Agency opened an investigation.

1.3 D. Ellingsworth was the representative of Leroy Ellingsworth (L. Ellingsworth) for Campus Court Apartments (CCA), and in the complaint it was stated that the four partners of CCA had not received financial records for the property from Bradley.

1.4 In response to the complaint, Bradley stated that his management of CCA began in 1996 through 2022, when an additional broker, David Hendricks (Hendricks), began to help with the day-to-day operations.

1.5 Bradley wrote that he had informal meetings with L. Ellingsworth and another partner over the course of the past decade, and they would informally discuss CCA while getting signatures for documents, such as HUD contracts, rent increases, tax returns, inspection reports, etc.

1 1.6 Bradley admitted it was his responsibility to supply the partners of CCA with
2 financial statements and other necessary documents that would be relevant for an owner to
3 have, stating he "...allowed myself to become complacent with my reporting obligations to the
4 Partners, in direct violation of the requirements."

5 **(1) Conclusion of Law:** By failing to report monthly to the owners of CCA, Bradley violated
6 ORS 696.301(3) and its implementing rule OAR 863-025-0055(4) (11/15/2016, 1/1/2018,
7 1/1/2019, 1/1/2021, and 1/1/2022 Editions).

8 **(2) Conclusion of Law:** By failing to create and maintain property management records for
9 CCA, Bradley violated ORS 696.301(3) and its implementing rule OAR 863-025-0035(1)(c)(4)
10 (11/15/2016, 1/1/2018, 1/1/2019, 1/1/2020, 1/1/2021, and 1/1/2022 Editions).

11 1.7 On March 7, 2023, Agency Investigator Aaron Grimes (Grimes) requested from
12 Hendricks the January 2022 monthly owner statement and bank statement.

13 1.8 On April 11, 2023, Grimes requested Bradley submit the property management
14 agreement (PMA) for CCA.

15 1.9 A review of the January 2022 bank statements for the client trust account ending
16 in -7414 (CTA #7414) shows an ending bank balance of \$14,375.43.

17 1.10 The check register for CTA #7414 for January 2022 shows the month ending
18 balance of \$13,978.94.

19 1.11 A review of the check register shows for deposit of funds, the purpose and
20 identity of the person who deposited the funds is missing.

21 1.12 On September 7, 2023, Bradley sent an email to Grimes with an explanation for
22 expenses shown on the check register, including a \$3,000.00 payment for management fees
23 to Safe Haven made on January 3, 2022. Bradley wrote that the \$3,000.00 payment for
24 management fees was a partial payment of the 7.5% amount of funds collected.

25 1.13 In the Compensation of Agent section of the PMA, it states the Agent shall be
26 entitled to receive for all services performed under this Agreement shall be a fee of Seven and
27 One-Half Percent (7.5%) of gross monthly collections per month. Such fees shall be computed
28 and paid on or after the 20th day of each month.

29 1.14 The \$3,000.00 payment made in January for management fees was less than
30 7.5%.

1 **(3) Conclusion of Law:** By failing to identify the date funds were received, and the purpose
2 and identity of the person who deposited the funds in the check register for CTA #7414,
3 Bradley violated ORS 696.301(3) and its implementing rule OAR 863-025-0040(2)(a)(A)(C)
4 (1/1/2022 Edition).

5 **(4) Conclusion of Law:** By failing to collect 7.5% management fees on the 20th of the
6 month in which funds are collected, as required by the PMA, for the month of January 2022,
7 Bradley violated ORS 696.301(3) as it incorporates ORS 696.890(3)(4)(a)(c)(e) (2021 Edition).

8 1.15 The January 2022 check register for CTA #7414 shows a disbursement dated
9 January 19, 2022, to DBH & Associates (DBH) in the amount of \$1,250.00.

10 1.16 DBH is a registered business with the Oregon Secretary of State. The business
11 was registered by Hendricks in June 2019.

12 1.17 During an interview with Grimes, Bradley stated that Hendricks provided training,
13 seminars, and audit to Safe Haven staff to ensure HUD compliance. Bradley also stated that
14 he did not remember if the owners of CCA were aware of DBH.

15 1.18 A review of the PMA shows there is no section addressing DBH as a vendor.

16 **(5) Conclusion of Law:** By failing to disclose in the PMA with CCA an employee or
17 business in which he had an interest, Bradley violated ORS 696.301(3) and its implementing
18 rule OAR 863-025-0020(2)(i)(j) (11/15/2016, 1/1/2018, 1/1/2020, 1/1/2021, and 1/1/2022
19 Editions).

20 1.19 Grimes requested that Bradley provide reconciliation documents, bank
21 statements, check registers, and owner ledgers for client trust accounts ending in -7831 (CTA
22 #7831), -7799 (CTA #7799), -7807 (CTA #7807), and CTA #7414 for the months of May, June,
23 and July 2022. Grimes also requested that Bradley submit the delegation of authority given to
24 Hendricks while working for Safe Haven.

25 1.20 A review of CTA #7414 for the month of May 2022, shows an unreconciled
26 amount of \$31.00 with no explanation. The reconciliation form does not include the date when
27 it was prepared, by whom it was prepared, and it is missing the signature of the person who
28 prepared it.

29 1.21 A review of CTA #7414 for the month of June 2022, shows an unreconciled
30 amount of \$31.00 with no explanation. The reconciliation form does not include the date when

1 it was prepared, by whom it was prepared, and it is missing the signature of the person who
2 prepared it.

3 1.22 A review of CTA #7414 for the month of July 2022, shows an unreconciled
4 amount of \$31.00 with no explanation. The reconciliation form does not include the date when
5 it was prepared, by whom it was prepared, and it is missing the signature of the person who
6 prepared it.

7 **(6) Conclusion of Law:** By failing to sign and date CTA #7414 for the months of May,
8 June, and July 2022, and identify the difference, Bradley violated ORS 696.301(3) and its
9 implementing rule OAR 863-025-0028(2)(a)(b)(d)(B) (1/1/2022 Edition).

10 **(7) Conclusion of Law:** By failing to resolve the account balance difference prior to the
11 next reconciliation period of May and June 2022, for CTA #7414, Bradley violated ORS
12 696.301(3) and its implementing rule OAR 863-025-0028(4) (1/1/2022 Edition).

13 1.23 A review of CTA #7799 reconciliation form for the months of May, June, and July
14 2022, shows that for each month, the reconciliation form does not include the date when it was
15 prepared, by whom it was prepared, and it is missing the signature of who prepared it.

16 **(8) Conclusion of Law:** By failing to sign and date the reconciliation form for CTA #7799
17 for the months of May, June, and July 2022, Bradley violated ORS 696.301(3) and its
18 implementing rule OAR 863-025-0028(2)(d)(B) (1/1/2022 Edition).

19 1.24 In an interview with Grimes, Bradley stated that CTA #7807 and CTA #7831 were
20 both closed. A review of Agency records shows that both CTAs were closed on May 8, 2023.

21 **(9) Conclusion of Law:** By failing to notify the Agency within 10-days of closing CTA
22 #7807 and CTA #7831, Bradley violated ORS 696.301(3) as it incorporates ORS 696.245(2)
23 (2021 Edition).

24 1.25 On August 24, 2023, Bradley told Grimes in an interview that Hendricks did
25 maintenance, accounts payable and accounts receivable, site management, communication
26 with HUD, as well as assisting with owners, turnovers, and inspections.

27 1.26 Bradley stated that he did not have a delegation of authority for Hendricks, as
28 well as he did not have a list of his duties in writing.

29 **(10) Conclusion of Law:** By failing to have written delegation of authority for Hendricks,
30 Bradley violated ORS 696.301(3) and its implementing rule OAR 863-025-

1 0015(1)(3)(b)(c)(A)(B)(C)(D)(E) (11/15/2016, 1/1/2018, 1/1/2019, 1/1/2020, 1/1/2021, 1/1/2022,
2 1/1/2023 Editions).

3 1.27 All of the above demonstrates incompetence or untrustworthiness in performing
4 acts for which the real estate licensee is required to hold a license.

5 1.28 All of the above demonstrates failure in performing duties to the property owner,
6 by not providing reasonable care and diligence, and not acting in the required fiduciary
7 capacity in all matters relating to trust funds.

8 **(11) Conclusion of Law:** Based on the foregoing, Licensee is subject to discipline under
9 ORS 696.301(12) (2019 and 2021 Editions)

10 **(12) Conclusion of Law:** Based on the foregoing, Licensee is subject to discipline under
11 ORS 696.301(3) as it incorporates ORS 696.890(4)(c)(e) (2015, 2017, 2019, and 2021
12 Editions).

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15 2.1 The foregoing violations are grounds for discipline pursuant to ORS 696.301.

16 2.2 The Agency reserves the right to investigate and pursue additional complaints
17 that may be received in the future regarding this licensee.

18 2.3 In establishing the violations alleged above, the Agency may rely on one or more
19 of the definitions contained in ORS 696.010.

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STIPULATION AND WAIVER

23 I, Glenn Bradley, have read and reviewed this Stipulated Final Order and its Findings of
24 Fact, Statements of Law and Conclusions of Law. I understand that the Findings of Fact,
25 Conclusions of Law and this Stipulation and Waiver of Hearing rights embody the full and
26 complete agreement and stipulation between the Agency and me. I further understand that if I
27 do not agree with this stipulation, I have the right to request a Hearing on this matter and to be
28 represented by legal counsel at such a Hearing. I also understand that any Hearing would be
29 conducted in accordance with the procedures set forth in ORS Chapter 183 and in accordance
30 with the Rules of Practice and Procedure adopted by the Attorney General of the State of

1 Oregon. By signing this Stipulated Final Order, I freely and voluntarily waive my rights to a
2 Hearing, to representation by legal counsel at such a Hearing, and to judicial review of this
3 matter.

4 I hereby agree and stipulate to the above Findings of Fact and Conclusions of Law and
5 understand that the Order which follows hereafter, which I have also read and understand,
6 may be completed and signed by the Real Estate Commissioner or may be rejected by the
7 Real Estate Commissioner. I further understand that, in accordance with the provisions of
8 ORS 696.445(3), notice of this Order shall be published in the Oregon Real Estate News
9 Journal.

10 In addition to all of the above, I agree that once the Commissioner executes this
11 Stipulated Final Order, I will accept service of the Stipulated Final Order by email, and hereby
12 waive the right to challenge the validity of service.

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ORDER

IT IS HEREBY ORDERED that Glenn Bradley's principal broker license be, and hereby is reprimanded.

IT IS SO STIPULATED:

IT IS SO ORDERED:



DocuSigned by:
GLENN JOSEPH BRADLEY
038927B81534406...
GLENN BRADLEY

DocuSigned by:
Steve Strode
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STEVEN STRODE

Date 12/11/2023 | 2:03 PM PST

Real Estate Commissioner

Date 12/12/2023 | 8:41 AM PST

Date of Service: 12/12/2023