

STATE OF NEW YORK
DEPARTMENT OF STATE

2/98 2/18/99
LS

In the Matter of the New York State
Department of State, Division of
Licensing Services,

Complainant,

-against-

COMPLAINT
96-4737
97-2766
98-0735

LAN LAN WANG, Representative Broker
PRINCIPAL CONNECTIONS LIMITED
444 PARK AVENUE SOUTH
NEW YORK, NY 10016

Respondents

Complainant, the New York State Department of State, Division
of Licensing Services, for a complaint alleges:

PRELIMINARY STATEMENT

1. This proceeding is brought pursuant to Article 12-A of the Real Property Law to revoke or suspend the real estate license of the respondents. The basis for the enforcement proceeding arises out of respondents' actions in, among other things: **engaging in the business of apartment information vendor without a license; demonstrating untrustworthiness and incompetence.**

JURISDICTION

2. The New York State Department of State is the governmental agency charged with the regulation of real estate brokers and real estate salespersons, and with the enforcement of Article 12-A of the Real Property Law, together with the implementing regulations set forth in 19 NYCRR Part 175. Specific authority to bring this enforcement proceeding is provided by Real Property Law §§441-c and 441-e. This proceeding is subject to Article 3 and 4 of the State Administrative Procedure Act, Article 12-A of the Real Property Law, and the rules and regulations promulgated thereunder.

PARTIES

3. The complainant, New York State Department of State, Division of Licensing Services ("DLS"), is the division of the Department of State charged with the administration and enforcement of Article 12-A of the Real Property Law, together with the implementing regulations set forth in 19 NYCRR Part 175.

4. Respondent, was at all times herein mentioned, and is, a licensed representative real estate broker for PRINCIPAL CONNECTIONS LIMITED, 444 PARK AVENUE SOUTH, NEW YORK, NY 10016, expiration date 12-6-98. Annexed hereto as Exhibit A is a current license record.

5. Respondent has, and continues to, engage in the business of Apartment Information Vendor, although not licensed to do so. Annexed as Exhibit B is a negative license history.

FIRST CAUSE OF ACTION

6. Respondent has advertised on the Internet that she will provide apartment information services, as "Manhattan Listing Xpress," "Metro List Xpress" and "Homeline" for a fee although not licensed to do so and in violation of the provisions of Real Property Law Article 12-C. See Exhibit C.

SECOND CAUSE OF ACTION

8. Upon information and belief, respondent has demanded and received fees and/or commissions for apartment information services although not licensed to do so.

WHEREFORE, complainant requests the following:

1. Revocation and/or suspension of respondent's real estate licenses.
2. Restitution to injured parties, with interest.
3. Maximum fines allowable by law

Date: February 8, 1999

By: _____

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