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FILED
MAY 14 2012

DEPARTMENT OF REAL ESTATE
By *[Signature]*

8 BEFORE THE DEPARTMENT OF REAL ESTATE
9 STATE OF CALIFORNIA

10 ***

12 In the Matter of the Accusation of) NO. H-11373 SF
13)
13 ROBERT ANTHONY CRUMRINE,) ACCUSATION
14)
14 Respondent.)
15)

16 The Complainant, E. J. HABERER, II, in his official capacity as a Deputy Real
17 Estate Commissioner of the State of California, for cause of Accusation against ROBERT
18 ANTHONY CRUMRINE, (hereinafter "Respondent"), is informed and alleges as follows:

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20 Respondent is presently licensed and/or has license rights under the Real Estate
21 Law, Part 1 of Division 4 of the Business and Professions Code (hereinafter "the Code") as a
22 real estate salesperson, and has a license endorsement and/or has license endorsement rights
23 under the Code as a mortgage loan originator.

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25 On or about November 1, 2010, Respondent made application to the State of
26 California Department of Real Estate (hereinafter "the Department") for a mortgage loan
27 originator license endorsement (hereinafter "License Endorsement").

1 FIRST CAUSE OF ACTION

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3 Each and every allegation in Paragraphs 1 and 2, inclusive, above, is
4 incorporated by this reference as if fully set forth herein.

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6 In response to Question 8(C) of the License Endorsement application identified
7 in Paragraph 2, above, to wit: "Do you have any unsatisfied judgments or liens against you?,"
8 Respondent concealed and failed to disclose the unsatisfied judgment against him identified in
9 Paragraph 5, below.

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11 On or about September 17, 2010, in the Superior Court of the State of California,
12 County of Alameda, Case No. RG10501201, a judgment was rendered against Respondent in
13 the amount of \$61,435.77, which was unsatisfied as of the date Respondent submitted the
14 License Endorsement application identified in Paragraph 2, above.

15 6

16 The facts alleged in Paragraphs 4 and 5, above, constitute Respondent's failure
17 to demonstrate the financial responsibility, character, and general fitness as to command the
18 confidence of the community within the meaning of Section 10166.05(c) of the Code, and
19 constitute grounds for the suspension or revocation of Respondent's license and license rights,
20 including license endorsements and license endorsement rights, pursuant to Sections 10177(a)
21 (Making Material Misstatement of Fact Required to be Revealed in License Application) and
22 10166.051(b) (Withholding Information or Making Material Misstatement in an Application for
23 a License Endorsement/Failure to Meet Requirements of Section 10166.05) of the Code.

24 SECOND CAUSE OF ACTION

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26 Each and every allegation in Paragraphs 1 through 6, inclusive, above, is
27 incorporated by this reference as if fully set forth herein.

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2 At all times herein mentioned up to and including May 9, 2011, in so acting as a
3 real estate salesperson and mortgage loan originator as described in Paragraph 1, above,
4 Respondent failed to maintain on file with the Department his mailing address, in that he
5 caused, suffered or permitted the Department's license records to reflect his mailing address as
6 6658 Thornton Avenue, Newark, California, when his actual mailing address was 1203 Laguna
7 Creek Lane, Pleasanton, California, such failure being a violation of Section 2715, Title 10 of
8 the California Code of Regulations.

10 The facts alleged in Paragraph 8, above, constitute grounds for the suspension or
11 revocation of Respondent's license and license rights, including license endorsements and
12 license endorsement rights, pursuant to Section 10177(d) (Willful Disregard of Real Estate
13 Law) of the Code.

14 COST RECOVERY

15 Section 10106 of the Code provides, in pertinent part, that in any order issued in
16 resolution of a disciplinary proceeding before the Department, the Commissioner may request
17 the Administrative Law Judge to direct a licensee found to have committed a violation of this
18 part to pay a sum not to exceed the reasonable costs of the investigation and enforcement of the
19 case.

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WHEREFORE, Complainant prays that a hearing be conducted on the allegations of this Accusation, and that upon proof thereof, a decision be rendered imposing disciplinary action against all licenses and license rights of Respondent under the Code, including all mortgage loan originator license endorsements and license endorsement rights of Respondent under the Code, and for such other and further relief as may be proper under the provisions of law.



E. J. HABERER, II
Deputy Real Estate Commissioner

Dated at Oakland, California,
this 10 day of May, 2012.