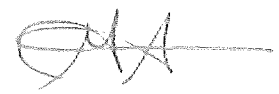


FILED

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December 26, 2014

BUREAU OF REAL ESTATE

By 

BEFORE THE BUREAU OF REAL ESTATE

STATE OF CALIFORNIA

\*\*\*

In the Matter of the Accusation of	)	
	)	NO. H-11782 SF
HOME LOAN SERVICE	)	
CORPORATION, and	)	
KEITH CHARLES KNAPP,	)	<u>ACCUSATION</u>
	)	
Respondents.	)	
	)	

The Complainant, ROBIN S. TANNER, in her capacity as a Deputy Real Estate Commissioner of the State of California, for cause of Accusation against HOME LOAN SERVICE CORPORATION ("HLSC") and KEITH CHARLES KNAPP ("KNAPP"), (collectively "Respondents"), is informed and alleges as follows:

1

At all times relevant, HLSC was and is presently licensed and/or has license rights under the Real Estate Law, Part 1 of Division 4 of the Business and Professions Code ("the Code") as a corporate real estate broker.

2

At all times relevant, KNAPP was and is presently licensed and/or has license rights under the Code as a real estate broker.

1  
2 On or about May 10, 2011, in the Superior Court of the State of California,  
3 County of Contra Costa, Case No. C08-00657, a final judgment was entered against  
4 Respondents based on grounds of fraud, misrepresentation, or deceit with reference to a  
5 transaction for which a real estate license is required. Respondents appealed that judgment.  
6 On or about January 8, 2014, the California Court of Appeal, First Appellate District, Case  
7 No. A133065, issued a decision reducing the award of compensatory damages against  
8 Respondents and affirming the remainder of the lower court judgment, including an award  
9 of punitive damages against each of the Respondents.

10  
11 The facts set forth in Paragraph 3, above, constitute cause under Section  
12 10177.5 (fraud in civil action) of the Code for the suspension or revocation of all licenses  
13 and license rights of Respondents under the Real Estate Law.

#### 14 PRIOR ADMINISTRATIVE PROCEEDINGS

15  
16 Effective September 3, 2013, in Case No. H-11529 SF, HLSC's corporate real  
17 estate broker license was publicly reprovved by the Commissioner pursuant to Sections  
18 10177(d) (willful disregard of Real Estate Law) and 10166.051 (grounds for disciplining  
19 Mortgage Loan Originator endorsement) of the Code in conjunction with Section 10145  
20 (trust fund handling) of the Code and Section 2832.1 (trust fund handling) of Title 10 of the  
21 California Code of Regulations; and KNAPP's real estate broker license was publicly  
22 reprovved by the Commissioner pursuant to Sections 10177(d), 10166.051 and 10159.2  
23 (broker supervision) of the Code.

#### 24 COST RECOVERY

25  
26 Section 10106 of the Code provides, in pertinent part, that in any order issued  
27 in resolution of a disciplinary proceeding before the Bureau, the Commissioner may request

1 the Administrative Law Judge to direct a licensee found to have committed a violation of this  
2 part to pay a sum not to exceed the reasonable costs of the investigation and enforcement of  
3 the case.

4 WHEREFORE, Complainant prays that a hearing be conducted on the  
5 allegations of this Accusation and that upon proof thereof, a decision be rendered imposing  
6 disciplinary action against all licenses and license rights of Respondents under the Code, and  
7 for such other and further relief as may be proper under the provisions of law.

8  
9  
10   
11 ROBIN S. TANNER  
12 Deputy Real Estate Commissioner

13  
14 Dated at Oakland, California,  
15 This 20<sup>th</sup> day of December, 2014.