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**FILED**

MAY 18 2022

DEPT. OF REAL ESTATE

By *Emma King*

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8  
9 BEFORE THE DEPARTMENT OF REAL ESTATE

10 STATE OF CALIFORNIA

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12 In the Matter of the Accusation of ) No. H-42317 LA  
13 )  
14 ALIN MANUEL YBARRA, ) ACCUSATION  
15 )  
16 Respondent. )  
17 )

18 The Complainant, Ruth Corral, a Supervising Special Investigator of the State of  
19 California, for cause of Accusation against ALIN MANUEL YBARRA (“Respondent”), is  
20 informed and alleges as follows:

21 1.

22 The Complainant, Ruth Corral, acting in her official capacity as a Supervising  
23 Special Investigator of the State of California, makes this Accusation against ALIN MANUEL  
24 YBARRA.

25 2.

26 All references to the “Code” are to the California Business and Professions Code  
27 and all references to “Regulations” are to Title 10, Chapter 6, California Code of Regulations.

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Accusation of Alin Manuel Ybarra

1 3.

2 Respondent presently has license rights under the Real Estate Law, Part 1 of  
3 Division 4 of the Code, as a real estate broker.

4 4.

5 Coast 2 Coast Home Services Inc presently has license rights as a corporate real  
6 estate broker.

7 5.

8 Coast 2 Coast Home Services Inc is licensed by the Department of Real Estate  
9 (“Department”) as a corporate real estate broker by and through Respondent, as the designated  
10 officer and broker responsible, pursuant to Code section 10159.2, for supervising the activities  
11 requiring a real estate license conducted on behalf of Coast 2 Coast Home Services Inc, or by  
12 Coast 2 Coast Home Services Inc’s officers, agents, and employees.

13 6.

14 On or about April 9, 2019, the Director of the Department of Financial  
15 Institutions of the State of Washington, in Case No. C-18-2388-19-CO01, through a Consent  
16 Order fined Respondent and Coast 2 Coast Home Services Inc in the amount of \$144,000 with  
17 \$134,000 stayed upon certain conditions and Respondent and Coast 2 Coast Home Services Inc  
18 agreed to pay restitution in the amount of \$74,650.85 and an investigation fee in the amount of  
19 \$2,150.40.

20 7.

21 On or about February 14, 2020, Respondent made application to the California  
22 Department of Financial Protection and Innovation for licensure as a Mortgage Loan Originator  
23 (“February 2020 MLO application”).

24 8.

25 On or about July 2, 2020, the Department of Financial Protection and  
26 Innovation, in Case No. 60DBO-4713, filed a Statement of Issues against Respondent.

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1 9.

2 On or about June 16, 2021, the Commissioner of the Department of Financial  
3 Protection and Innovation, in Case No. 60DBO-4713 and OAH No. 202010063, filed an Order  
4 Denying Mortgage Loan Originator License Application and adopted the Proposed Decision  
5 against Respondent. As more fully described in the Proposed Decision, the Administrative Law  
6 Judge held that cause existed pursuant to California Financial Code section 22109.1 to deny  
7 Respondent's February 2020 MLO application, and that the information contained in  
8 Respondent's February 2020 MLO application was false, misleading, and dishonest.

9 10.

10 The prior license discipline against Respondent, as described in Paragraphs 6  
11 through 9 above, and the underlying conduct constitute cause under sections 10177(f)  
12 and 10177(j) of the Code for the suspension or revocation of all the licenses, license  
13 endorsements, and license rights of Respondent under the Real Estate Law.

14 11.

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

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1                   WHEREFORE, Complainant prays that a hearing be conducted on the  
2 allegations of this Accusation and that upon proof thereof, a decision be rendered imposing  
3 disciplinary action against all the licenses, license endorsements, and license rights of  
4 Respondent ALIN MANUEL YBARRA under the Real Estate Law, for the cost of  
5 investigation and enforcement as permitted by law, and for such other and further relief as may  
6 be proper under other applicable provisions of law.

7  
8 Dated at Sacramento, California

9 this 13th day of May, 2022

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11 

12 Ruth Corral  
13 Supervising Special Investigator

14 cc: ALIN MANUEL YBARRA  
15 Ruth Corral  
16 Sacto.