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JUN 24 2016
BUREAU OF REAL ESTATE
By B. Nicholas

8 BEFORE THE BUREAU OF REAL ESTATE
9 STATE OF CALIFORNIA

10 * * *

11 In the Matter of the Accusation of:)
12 CHRISTOPHER CHARLES CAYCE,) No. H- 3022 FR
13 Respondent.) ACCUSATION
14 _____)

15 The Complainant, BRENDA SMITH, in her official capacity as a Supervising
16 Special Investigator for the State of California, for cause of Accusation against CHRISTOPHER
17 CHARLES CAYCE ("Respondent"), is informed and alleges as follows:

18 1

19 Respondent is presently licensed and/or has license rights under the Real Estate
20 Law, Part 1 of Division 4 of the Business and Professions Code (hereinafter "the Code") as a real
21 estate broker.

22 2

23 Following a hearing before the State Bar Court of California, Hearing Department
24 - San Francisco, Case No. 11-O-15647-LMA, and an appeal to the State Bar Court of California
25 Review Department, Case No. 11-O-15647, the California Supreme Court issued an Order on
26 August 26, 2015, in Case No. S224895 suspending Respondent from the practice of law for two
27 years, stayed, with nine (9) months actual suspension, and placed Respondent on probation for

1 two years. The California Supreme Court also ordered Respondent to pay restitution to a former
2 client in the amount of \$17,215.19 plus 10 percent interest per annum, take and pass the
3 Multistate Professional Responsibility Examination within one year, and comply with other
4 conditions. The California Supreme Court's Order was based upon the finding that Respondent
5 violated one count of the Rules of Professional Conduct, Rule 4-110(A) for failure to deposit
6 client funds in trust account, and one count of the Rules of Professional Conduct, Rule 4-110(A)
7 for commingling personal funds in a client trust account.

8 3

9 The facts alleged in paragraph 2, above, constitute grounds for the suspension or
10 revocation of all real estate licenses and license rights of Respondent pursuant to Section
11 10177(f) of the Code (license issued by another agency of this state suspended or revoked for acts
12 that, if done by a real estate licensee, would be grounds for the suspension or revocation of a
13 California real estate license).

14 COST RECOVERY

15 4

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

21 WHEREFORE, Complainant prays that a hearing be conducted on the
22 allegations of this Accusation and that upon proof thereof, a decision be rendered revoking all
23 licenses and license rights of Respondent under the Real Estate Law (Part 1 of Division 4 of the

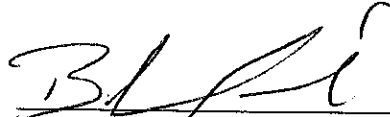
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1 Business and Professions Code), for the costs of investigation and enforcement as permitted by
2 law, and for such other and further relief as may be proper under the provisions of law.

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5 BREND A SMITH
6 Supervising Special Investigator

7 Dated at Fresno, California,
8 this 15 day of June, 2016.

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10 DISCOVERY DEMAND

11 Pursuant to Sections 11507.6, *et seq.* of the *Administrative Procedure Act*, the
12 Bureau hereby makes demand for discovery pursuant to the guidelines set forth in the
13 *Administrative Procedure Act*. Failure to provide Discovery to the Bureau may result in the
14 exclusion of witnesses and documents at the hearing or other sanctions that the Office of
15 Administrative Hearings deems appropriate.