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FILED

AUG 20 2026

DEPT. OF REAL ESTATE

By

BEFORE THE DEPARTMENT OF REAL ESTATE
STATE OF CALIFORNIA

* * *

In the Matter of the Accusation of	)	No. H-05955 SD
	)	
MAXIMUM MORTGAGE & REAL ESTATE,	)	<u>ACCUSATION</u>
INC. and CHRISTOPHER RYAN	)	
RODRIGUEZ,	)	
	)	
Respondent(s).	)	

The Complainant, Veronica Kilpatrick, a Supervising Special Investigator of the State of California, for cause of Accusation against MAXIMUM MORTGAGE & REAL ESTATE, INC. and CHRISTOPHER RYAN RODRIGUEZ (collectively "Respondents") alleges as follows:

1.

The Complainant, Veronica Kilpatrick, a Supervising Special Investigator of the State of California, makes this Accusation in her official capacity.

2.

All references to the "Code" are to the California Business and Professions Code and all references to "Regulations" are to Title 10, Chapter 6, California Code of Regulations.

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ACCUSATION

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1 (b) The Department originally issued RODRIGUEZ's RES license on or about
2 June 7, 2006. RODRIGUEZ's license expired on July 2, 2026, unless renewed.

3 (c) MMRE was, and is currently, the responsible broker for RODRIGUEZ from
4 July 21, 2011 to June 6, 2018 and from July 3, 2018 through the filing of this accusation.

5 (d) According to the documents provided to the Department, RODRIGUEZ is
6 49% owner of MMRE.

7 LICENSED ACTIVITIES

8 5.

9 At all times relevant herein Respondents were engaged in the business of, acted
10 in the capacity of, advertised or assumed to act as a real estate corporation, within the meaning
11 of Section 10131 (b) of the Code. Respondents' activities included the leasing or renting of real
12 property and the collection of rents and security deposits for real property on behalf of others
13 for compensation or in expectation of compensation.

14 6.

15 (AUDIT SD250011)

16 On or about April 16, 2026, the Department completed an audit examination of
17 the books and records of Respondents pertaining to the property management activities
18 described in Paragraph 5 above. The audit examination covered the period of time from
19 January 1, 2024 to October 31, 2025 ("audit period"). The primary purposes of the examination
20 was to determine whether Respondents conducted real estate activities that complied with the
21 Real Estate Law. The audit examination revealed violations of the Code and the Regulations as
22 set forth in the following paragraphs, and more fully discussed in Audit No. SD250011, and the
23 exhibits and work papers attached to said audit report.

24 7.

25 At all times mentioned herein, and in connection with the property management
26 activities described in Paragraph 5, above, Respondents accepted or received funds, including
27 funds in trust ("trust funds") from or on behalf of actual or prospective parties to transactions

1 handled by Respondents and thereafter made deposits and/or disbursements of such funds.
2 According to the documents provided, Respondents maintained one (1) bank account for
3 handling of the receipts and disbursements of funds during the audit period in connection with
4 the property management activities as well as a general account for business purposes. The
5 bank account is as follows:

6 Bank Account 1 ("BA 1")

7 Bank: Bank of America

8 Account Name: Maximum Mortgage & Real Estate, Inc.

9 Account Number: xxxxxxxx8778

10 Signatories: Christopher R Rodriguez

11 Signatures Required: One

12 Purpose: BA 1 was maintained to handle trust funds in the property management
13 activities for multiple beneficiaries, including, but not limited to, rents.

14 Violations of the Real Estate Law

15 8.

16 The audit examination revealed violations of the Code and the Regulations, as
17 set forth in the following paragraphs, and more fully discussed in Audit Report No. SD250011,
18 and the exhibits and work papers attached to the audit report:

19 (a) **Handling of Trust Funds/Trust Fund Handling (Code section 10145 and**
20 **Regulations sections 2832)**. Based on an examination of BA 1's records, during the audit
21 period, MMRE received trust funds in connection with the property management activities of
22 104 Taft Circle in Oceanside, California (the "Property"). Designated Officer of MMRE,
23 Michael Sisco, stated that he does not "authorize any property management activities for any
24 agent under (his) license. This prohibition includes the use of trust accounts or personal broker
25 escrows. . ." RODRIGUEZ provided to information to the Department of BA 1, where trust
26 funds were deposited allegedly without the knowledge of Michael Sisco.

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(b) Handling of Trust Funds/Trust Account Withdrawal (Code Section 10145 and Regulations Sections 2834). Based on an examination of BA 1's records, designated officer Michael Sisco was not a signer for BA 1, and only RODRIGUEZ was a signer for BA 1, where rents from the Property were deposited and disburse during the audit period in violation of Code Section 10145 and Regulations Sections 2834.

(c) Handling of Trust Funds/Commingling (Code sections 10145 and 10176(e) and Regulations sections 2832). MMRE received trust funds in connection with the Property during the audit period and comingled them with MMRE's funds in violation of Code section 10145 and 10176(e) and Regulations section 2832.

Additional Violations of the Real Estate Law

9.

RODRIGUEZ performed property management activities, requiring a broker license, without the knowledge and/or approval of his responsible broker and/or designated officer in violation of Code Section 10130.

10.

Respondents failed to retain records for 3 years of copies of all real estate records, including, but not limited to, listings and deposit receipts, and failed to provide them for inspection by the Commissioner after notice in violation of Code Section 10148.

11.

The overall conduct of Respondents violates the Real Estate Law and constitutes cause for the suspension or revocation of its real estate license and license rights under the provisions of **Code Section 10177(g)** for negligence and **Code Section 10177(d)** for willful disregard of the Real Estate Law.

12.

Each of the foregoing violations in Paragraphs 8 (a)-(c) above constitute cause for the suspension or revocation of the real estate license and/or license rights of Respondents under the provisions of Code sections 10177(d) and 10177(g).

(AUDIT COSTS)

13.

Section 10148(b) of the Code, provides, in pertinent part, that the Real Estate Commissioner shall charge a real estate broker for the costs of any audit if the Commissioner has found in a final decision, following a disciplinary hearing, that the broker has violated Section 10145 of the Code or a regulation or rule of the Commissioner interpreting said Code section.

(INVESTIGATION AND ENFORCEMENT COSTS)

14.

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

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2 PRAYER

3 WHEREFORE, Complainant prays that a hearing be conducted on the
4 allegations of this Accusation and that upon proof thereof, a decision be rendered imposing
5 disciplinary action against all licenses and/or license rights under the Real Estate Law (Part 1 of
6 Division 4 of the California Business and Professions Code) of Respondents MAXIMUM
7 MORTGAGE & REAL ESTATE, INC. and CHRISTOPHER RYAN RODRIGUEZ, for the
8 cost of investigation and enforcement as permitted by law, and for such other and further relief
9 as may be proper under applicable provisions of law.

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11 Dated at San Diego, California this 19 day of August, 2026.

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13 
14 Veronica Kilpatrick
15 Supervising Special Investigator

16 cc: MAXIMUM MORTGAGE & REAL ESTATE, INC.
17 CHRISTOPHER RYAN RODRIGUEZ
18 Sacto.
19 Audits –Chona Picayo
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