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BUREAU OF REAL ESTATE
By H. Diaz

8 BEFORE THE BUREAU OF REAL ESTATE
9 STATE OF CALIFORNIA

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11 In the Matter of the Accusation of)

No. H-6671 SAC

12 STANLEY MICHAEL COMBS,)

ACCUSATION

13 Respondent.)
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15 The Complainant, CHIKA SUNQUIST, a Supervising Special Investigator of the
16 State of California, for cause of Accusation against STANLEY MICHAEL COMBS
17 (Respondent), is informed and alleges as follows:

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19 The Complainant, CHIKA SUNQUIST, a Supervising Special Investigator of the
20 State of California, makes this Accusation in his official capacity.

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22 Respondent is presently licensed and/or has license rights under the Real Estate
23 Law, Part 1 of Division 4 of the Business and Professions Code (Code).

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25 At all times mentioned, Respondent was and is licensed by the State of California
26 Bureau of Real Estate (Bureau) as a real estate broker.

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1 At all times mentioned, Respondent engaged in the business of, acted in the
2 capacity of, advertised or assumed to act as a real estate broker in the State of California within
3 the meaning of Sections 10131(d) and 10131(e) of the Code, including the operation and
4 conduct of a mortgage loan brokerage business with the public wherein Respondent solicited
5 lenders and borrowers for loans secured directly or collaterally by liens on real property or a
6 business opportunity, and wherein such loans were arranged, negotiated, processed, and
7 consummated by Respondent on behalf of others and wherein promissory notes or interests
8 therein were sold or purchased on behalf of another or others for compensation or in expectation
9 of a compensation.

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11 From on or about May 31, 2017, to July 12, 2017, the Bureau conducted an audit
12 of the records of Respondent. The auditor examined the records for the period of January 1,
13 2015, through March 31, 2017.

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15 In the course of activities described in Paragraph 4, Respondent:

16 (a) Failed to submit to the Bureau in a timely manner the Trust Account
17 Review Report (TAR) for the years 2015 and 2016 as required under Section 10232.2(a) of the
18 Code;

19 (b) Failed to submit to the Bureau in a timely manner the Quarterly Trust
20 Fund Status Reports (Threshold Reports) (RE 855) including, but not limited to the 1st quarter of
21 2017, in violation of Section 10232.25(a) of the Code;

22 (c) Failed to submit to the Bureau in a timely manner the Mortgage Loan
23 Business Activity Report (RE 881) for the years 2015 and 2016 as required under Section
24 10232.2(c) of the Code; and

25 (d) Failed to provide, for loan numbers 15010701 and 12062801, written
26 notification to the lender within 15 days of the delinquency of an installment payment in
27 violation of Section 10233(c)(d) of the Code.

The facts alleged in the First Cause of Action are grounds for the suspension or revocation of Respondents' licenses and license rights under the following sections of the Code and Regulations:

As to Paragraph 6(a), under Sections 10177(d) and/or 10177(g) of the Code in conjunction with Section 10232.2(a) of the Code;

As to Paragraph 6(b), under Sections 10177(d) and/or 10177(g) of the Code in conjunction with Section 10232.25(a) of the Code;

As to Paragraph 6(c), under Sections 10177(d) and/or 10177(g) of the Code in conjunction with Sections 10232.2(c) of the Code; and

As to Paragraph 6(d), under Sections 10177(d) and/or 10177(g) of the Code in conjunction with Section 10233(c) of the Code.

COST RECOVERY

Section 10106 of the Code provides, in pertinent part, that in any order issued in resolution of a disciplinary proceeding before the Bureau, 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 the investigation and enforcement of the case.

PREVIOUS ADMINISTRATIVE PROCEEDING

Effective October 11, 2012, in Case No. H-2683 F2638 FR, the Real Estate Commissioner issued an Order which suspended the real estate broker license of Respondent for ninety (90) days, stayed upon terms and conditions, for violation of Sections 10176(a), 10177(g), and 10177(d) of the Code.

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

1 Business and Professions Code), for the cost of the investigation and enforcement of this case as
2 permitted by law, for the cost of the Bureau's audit as permitted by law, and for such other and
3 further relief as may be proper under the provisions of law.
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6 CHIKA SUNQUIST
7 Supervising Special Investigator

8 Dated at Sacramento, California,
9 this 18th day of April, 2018
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