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1	TRULY SUGHRUE, Counsel FILED
2	Department of Real Estate
3	P.O. Box 137007 Sacramento, CA 95813-7007 DEPARTMENT OF REAL ESTATE
4	Telephone: (916) 263-8672 By X. Knopp
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8	BEFORE THE DEPARTMENT OF REAL ESTATE
9	STATE OF CALIFORNIA
10	* * *
11	In the Matter of the Accusation of (
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13	STEVEN FULGHAM SCOTT,
14	Kespondent.
15	The Complainant, ROBIN S. TANNER, a Supervising Special Investigator of the
16	State of California, for cause of Accusation against STEVEN FULGHAM SCOTT (Respondent),
17	is informed and alleges as follows:
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18	The Complainant, ROBIN S. TANNER, a Supervising Special Investigator of the
19	State of California, makes this Accusation in her official capacity.
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21	Respondent is presently licensed and/or has license rights under the Real Estate
22	Law, Part 1 of Division 4 of the Business and Professions Code (Code).
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24	At all times mentioned, Respondent was and is licensed by the State of California
25	Department of Real Estate (Department) as a real estate broker.
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2	Respondent informed the Department that his main office address is 4637 Chabot
3	Drive, Suite 118, Pleasanton, California 94588.
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5	At no time to the date of the filing of this Accusation has the Department received
6	notice from Respondent that his main office address has changed from 4637 Chabot Drive, Suite
7	118, Pleasanton, California 94588.
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9	On or about September 14, 2018, a Special Investigator from the Department's
10	Oakland Office drove to 4637 Chabot Drive, Suite 118, Pleasanton, California 94588, and found
11	that the suite was occupied by "USA China Network Corp".
12	7
13	The acts and/or omissions of Respondent as described above violate Section
14	10162 of the Code (Maintenance of Definite Place of Business Within State) and Section 2715
15	(Notification to Department of Principal Place of Business) Title 10, California Code of
16	Regulations (Regulations), and are grounds for the revocation or suspension of all Respondent's
17	licenses and/or license rights under Section 10177(d) (Willful Violation of Real Estate Law) of
18	the Code.
19	COST RECOVERY
20	8
21	Section 10106 of the Code provides, in pertinent part, that in any order issued in
22	resolution of a disciplinary proceeding before the Department, the Commissioner may request the
23	Administrative Law Judge to direct a licensee found to have committed a violation of this part to
24	pay a sum not to exceed the reasonable costs of the investigation and enforcement of the case.
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WHEREFORE, Complainant prays that a hearing be conducted on the 1 allegations of this Accusation and that upon proof thereof, a decision be rendered imposing 2 discipline on all licenses and license rights of Respondent under the Real Estate Law (Part 1 of 3 Division 4 of the Business and Professions Code), for the cost of the investigation and 4 enforcement of this case as permitted by law, and for such other and further relief as may be 5 proper under the provisions of law. 6 7 8 ROBIN S. TANNER Supervising Special Investigator 9 10 Dated at Oakland, California, this 16th day of October 11 . 2018 12 DISCOVERY DEMAND 13 Pursuant to Sections 11507.6, et seq. of the Government Code, the Department of Real Estate hereby makes demand for discovery pursuant to the guidelines set forth in the Administrative 14 Procedure Act. Failure to provide Discovery to the Department of Real Estate may result in the 15 exclusion of witnesses and documents at the hearing or other sanctions that the Office of Administrative Hearings deems appropriate. 16 17 18 19 20 21 22 23 24 25 26 27 - 3 -