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**FILED**

OCT 24 2018

DEPARTMENT OF REAL ESTATE  
By X. Krapp

8 BEFORE THE DEPARTMENT OF REAL ESTATE  
9 STATE OF CALIFORNIA

10 \* \* \*

11 In the Matter of the Accusation of

12 STEVEN FULGHAM SCOTT,

13 Respondent.

No. H-12315 SF

ACCUSATION

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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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19 The Complainant, ROBIN S. TANNER, a Supervising Special Investigator of the  
20 State of California, makes this Accusation in her 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 Department of Real Estate (Department) as a real estate broker.

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Respondent informed the Department that his main office address is 4637 Chabot Drive, Suite 118, Pleasanton, California 94588.

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At no time to the date of the filing of this Accusation has the Department received notice from Respondent that his main office address has changed from 4637 Chabot Drive, Suite 118, Pleasanton, California 94588.

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On or about September 14, 2018, a Special Investigator from the Department's Oakland Office drove to 4637 Chabot Drive, Suite 118, Pleasanton, California 94588, and found that the suite was occupied by "USA China Network Corp".

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The acts and/or omissions of Respondent as described above violate Section 10162 of the Code (Maintenance of Definite Place of Business Within State) and Section 2715 (Notification to Department of Principal Place of Business) Title 10, California Code of Regulations (Regulations), and are grounds for the revocation or suspension of all Respondent's licenses and/or license rights under Section 10177(d) (Willful Violation of Real Estate Law) of the Code.

COST RECOVERY

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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 the investigation and enforcement of the case.

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