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DEPARTMENT OF REAL ESTATE

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9 BEFORE THE DEPARTMENT OF REAL ESTATE

10 STATE OF CALIFORNIA

11 * * *

12 In the Matter of the Accusation of)
13)
14)
15)
16)
17)
18)

No. H-37777-LA

A C C U S A T I O N

19 CONQUEST GROUP, INC.;)
20 and CARLOS SANDOVAL)
21 individually and as)
22 designated officer of)
23 Conquest Group, Inc.,)
24)
25 Respondents,)
26)
27)

28 The Complainant, Robin Trujillo, a Deputy Real Estate
29 Commissioner of the State of California, for cause of accusation
30 against CONQUEST GROUP, INC., and CARLOS SANDOVAL individually
31 and as designated officer of Conquest Group, Inc., alleges as
32 follows:
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1 1. The Complainant, Robin Trujillo, acting in her
2 official capacity as a Deputy Real Estate Commissioner of the
3 State of California, makes this Accusation against CONQUEST
4 GROUP, INC., and CARLOS SANDOVAL.

5 2. CONQUEST GROUP, INC., and CARLOS SANDOVAL
6 individually and as designated officer of Conquest Group, Inc.
7 (hereinafter referred to as "Respondents") are presently licensed
8 and/or have license rights under the Real Estate Law (Part 1 of
9 Division 4 of the Business and Professions Code, hereinafter
10 Code).

11 3. At all times herein mentioned, Respondents were
12 licensed as a real estate broker.

13 4. On or about January 10, 2009, for or in expectation
14 of compensation, Respondents solicited and negotiated a re-
15 finance loan and loan modification on real property located at
16 13122 Rangoon St., Arleta, California, for borrowers Marilou and
17 Jose Gomez.

18 5. Respondents violated Code Section 10145(a) and
19 Regulation 2832 by collecting advance fees from the borrowers and
20 not depositing the fees into a real estate broker trust account.

21 6. Respondents misappropriated the funds they received
22 from the borrowers without the knowledge or permission of the
23 borrowers.

24 7. Respondents violated Code Section 10085 and
25 Regulation 2970 by failing to provide advance fee
26 material/agreements to be used to the Commissioner for review and
27 approval ten days prior to there use.

1 8... The conduct of Respondents, as alleged above,
2 subjects their real estate license and license rights to
3 suspension or revocation pursuant to Section 10176(i) of the
4 Business and Professions Code, and Sections 10177(d) and/or
5 10177(g) for violation of Code Sections 10085 and 10145, and
6 Regulations 2832 and 2970.

7 WHEREFORE, Complainant prays that a hearing be
8 conducted on the allegations of this Accusation and that upon
9 proof thereof, a decision be rendered imposing disciplinary
10 action against all licenses and license rights of Respondents
11 CONQUEST GROUP, INC., and CARLOS SANDOVAL individually and as
12 designated officer of Conquest Group, Inc. under the Real Estate
13 Law (Part 1 of Division 4 of the Business and Professions Code)
14 and for such other and further relief as may be proper under
15 other applicable provisions of law.

16 Dated at Los Angeles, California

17 this 6 day of January, 2012.

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19 
20 ROBIN TRUJILLO
21 Deputy Real Estate Commissioner
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23

24 cc: Conquest Group, Inc.
25 Carlos Sandoval
26 Robin Trujillo
27 Sacto.