JAMES R. PEEL, Counsel (SBN 47055) 1 Bureau of Real Estate 2 320 West Fourth Street, Suite 350 Los Angeles, CA 90013-1105 FILED 3 Telephone: (213) 576-6982 4 MAY 1 3 2015 (213) 576-6913 (Direct) -or-BUREAU OF REALESTATE 5 7 8 BEFORE THE BUREAU OF REAL ESTATE 9 STATE OF CALIFORNIA 10 11 In the Matter of the Accusation of ) No. H-39832 LA 12  $\underline{A} \ \underline{C} \ \underline{C} \ \underline{U} \ \underline{S} \ \underline{A} \ \underline{T} \ \underline{I} \ \underline{O} \ \underline{N}$ 13 SANDRA MORRISON, 14 Respondent, 15 16 17 The Complainant, Maria Suarez, a Deputy Real Estate 18 19 Commissioner of the State of California, for cause of accusation 20 against SANDRA MORRISON, alleges as follows: 21 The Complainant, Maria Suarez, acting in her 1. 22 official capacity as a Deputy Real Estate Commissioner of the 23 State of California, makes this Accusation against SANDRA 24 MORRISON. 25 /// 26

The Accusation of Sandra Morrison

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- 2. SANDRA MORRISON (hereinafter referred to as "Respondent") is presently licensed and/or has license rights under the Real Estate Law (Part 1 of Division 4 of the Business and Professions Code, hereinafter Code).
- 3. At all times herein mentioned, Respondent was licensed as a real estate salesperson.
- 4. During 2012 and 2013, Respondent engaged in the business of, acted in the capacity of, advertised or assumed to act as a real estate broker in the State of California within the meaning of Section 10131(b) of the Code including soliciting owners and renters, negotiating the lease and rental of real property, and collecting rents from real property.
- 5. On or about August 1, 2012, Respondent entered into a property management agreement with homeowner Michelle N. for the property located at 14439 Colombia Court, Adelanto, California.
- 6. On or about October 16, 2012, Respondent entered into a residential lease agreement with tenant Tommy B. for the aforementioned property.
- 7. Respondent collected rent payments from the tenant and failed to forward the payments to her employing broker.
- 8. Respondent misappropriated the rent payments to her own use and benefit without the knowledge or permission of the owner.

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The Accusation of Sandra Morrison

9. There is a \$1,859 water bill due against the property as a result of Respondent turning the water on illegally.

10. The conduct, acts and/or omissions of Respondent, as alleged above, subjects her real estate license and license rights to suspension or revocation pursuant to Sections 10130, 10145(c), 10177(d) and 10177(j) of the Code.

## COST RECOVERY

Code Section 10106 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.

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Accusation of Sandra Morrison

WHEREFORE, Complainant prays that a hearing be conducted on the allegations of this Accusation and that upon proof thereof, a decision be rendered imposing disciplinary action against all licenses and license rights of Respondent SANDRA MORRISON under the Real Estate Law (Part 1 of Division 4 of the Business and Professions Code), for the cost of investigation and enforcement as permitted by law, and for such other and further relief as may be proper under other applicable provisions of law.

Dated at Los Angeles, California this 29th day of the Augustus Augustus (2015.

Deputy Real Estate Commissioner

cc: Sandra Morrison
Impact Realty, Inc.

Maria Suarez

Sacto.

Accusation of Sandra Morrison