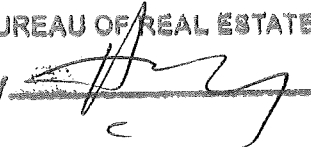


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**FILED**

AUG 18 2015

BUREAU OF REAL ESTATE

By 

8 BEFORE THE BUREAU OF REAL ESTATE

9 STATE OF CALIFORNIA

10 \* \* \*

11 In the Matter of the Accusation of )  
12 )  
13 )  
14 GRAY WOLF TRANSFERS, INC.; )  
and CHARLES ANTHONY )  
15 BENNETT individually )  
and as designated officer of )  
Gray Wolf Transfers, Inc., )  
16 Respondents, )  
17 )  
18 )

No. H-39943 LA

A C C U S A T I O N

19  
20 The Complainant, Maria Suarez, a Supervising Special  
21 Investigator of the State of California, for cause of accusation  
22 against GRAY WOLF TRANSFERS, INC., and CHARLES ANTHONY BENNETT  
23 individually and as designated officer of Gray Wolf Transfers,  
24 Inc., alleges as follows:

25 ///

26 ///

27 Accusation of Gray Wolf Transfers, Inc.

1           1. The Complainant, Maria Suarez, acting in her  
2 official capacity as a Supervising Special Investigator of the  
3 State of California, makes this Accusation against GRAY WOLF  
4 TRANSFERS, INC., and CHARLES ANTHONY BENNETT.

5           2. GRAY WOLF TRANSFERS, INC., and CHARLES ANTHONY  
6 BENNETT individually and as designated officer of Gray Wolf  
7 Transfers, Inc. (hereinafter referred to as "Respondents") are  
8 presently licensed and/or have license rights under the Real  
9 Estate Law (Part 1 of Division 4 of the Business and Professions  
10 Code, hereinafter Code).

11           3. At all times herein mentioned, Respondents GRAY  
12 WOLF TRANSFERS, INC., and CHARLES ANTHONY BENNETT were licensed  
13 as real estate brokers. Respondent BENNETT was the designated  
14 officer and pursuant to Code Section 10159.2 was responsible for  
15 the supervision and control of the activities conducted on behalf  
16 of the corporation by its officers and employees as necessary to  
17 secure full compliance with the provisions of the real estate law  
18 including supervision of salespersons licensed to the corporation  
19 in the performance of acts for which a real estate license is  
20 required.

21           4. At all times material herein, Respondents engaged  
22 in the business of, acted in the capacity of, advertised or  
23 assumed to act as real estate brokers in the State of California  
24 within the meaning of Section 10131(a) of the Code including  
25 selling or offering to sell and soliciting or negotiating sales  
26 of timeshares and Section 10131.2 (advance fee handling).

27           Accusation of Gray Wolf Transfers, Inc.

1           5. On or about April 30, 2015, the Bureau completed an  
2 examination of Respondent GRAY WOLF TRANSFERS, INC.'s books and  
3 records, pertaining to the activities described in Paragraph 4  
4 above, covering a period from June 19, 2012, through September  
5 30, 2014, which examination revealed violations of the Code and  
6 of Title 10, Chapter 6, California Code of Regulations  
7 (hereinafter Regulations) as set forth below.

8           6. The examination described in Paragraph 5, above,  
9 determined that, in connection with the activities described in  
10 Paragraph 4 above, Respondents accepted or received funds,  
11 including funds in trust (hereinafter "trust funds") from or on  
12 behalf of principals, and thereafter made deposit or disbursement  
13 of such funds.

14           7. In the course of activities described in Paragraphs  
15 4 through 6 and during the examination period described in  
16 Paragraph 5, Respondents GRAY WOLF TRANSFERS, INC., and CHARLES  
17 ANTHONY BENNETT acted in violation of the Code and the  
18 Regulations as follows, and as more specifically set forth in  
19 Audit Report No. LA 130189 and related exhibits:

20           a. Violated Code Section 10145 by not depositing trust  
21 funds into a real estate broker trust account during 2012, 2013,  
22 and 2014.

23           b. Violated Code Section 10145 and Regulation 2832.1  
24 by maintaining as of September 30, 2014 a trust account shortage  
25 of \$54,202.94.

26           Accusation of Gray Wolf Transfers, Inc.  
27

1           c. Violated Code Section 10085 and Regulation 2970 by  
2 not obtaining from the Bureau a "no objection" letter for use of  
3 the advance fee agreements and all materials in soliciting  
4 prospective timeshare owners and sellers and collecting the fees  
5 in advance.

6           d. Violated Code Sections 10145 and 10146 and  
7 Regulations 2832 and 2972 by collecting fees in advance from the  
8 timeshare owners in connection with the resale/transfer of  
9 timeshare transactions without maintaining and providing a  
10 verified accounting to the timeshare owners showing the services  
11 rendered or to be rendered, identification of the trust account  
12 into which the advance fees were deposited and the details of how  
13 the funds were disbursed.

14           e. Violated Code Section 10145 and Regulation 2831 by  
15 failing to maintain a control record that was accurate and  
16 complete for each trust account and PayPal Account. The records  
17 did not include date trust funds were received, from whom trust  
18 funds were received, and check number for each disbursement.

19           f. Violated Code Section 10145 and Regulation 2831.1  
20 by not maintaining a complete separate record for each  
21 transaction set forth in chronological sequence in columnar form  
22 showing date of each deposit, date of each disbursement, check  
23 number and amount of each disbursement and the running balance  
24 after posting transactions on any date for the trust account and  
25 PayPal Account.

26           The Accusation of Gray Wolf Transfers, Inc.  
27

1 g. Violated Code Section 10145 and Regulation 2831.2  
2 by not maintaining complete and accurate monthly reconciliations  
3 of all the separate records to the control record.

4 h. Violated Code Section 10148 by failing to provide  
5 all the books and records related to its timeshare transfer  
6 transactions to the Bureau for examination after the Bureau's  
7 notice and subpoena.

8 i. Violated Code Section 10130 by engaging in  
9 timeshare transfer activity from February 13, 2014 through  
10 September 30, 2014, when there was no designated officer for the  
11 corporation.

12 8. The conduct, acts and/or omissions of Respondents  
13 GRAY WOLF TRANSFERS, INC., and CHARLES ANTHONY BENNETT, as  
14 alleged above, subjects their real estate licenses and license  
15 rights to suspension or revocation pursuant to Sections 10177(d)  
16 and 10177(g) of the Code.

17  
18 FAILURE TO SUPERVISE

19 9. The conduct, acts and/or omissions of Respondent  
20 BENNETT, in failing to ensure full compliance with the Real  
21 Estate Law is in violation of Code Section 10159.2 and subjects  
22 his real estate licenses and license rights to suspension or  
23 revocation pursuant to Sections 10177(d), 10177(g), and 10177(h)  
24 of the Code.

25 The Accusation of Gray Wolf Transfers, Inc.  
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27

1 COST RECOVERY

2 Code Section 10106 provides, in pertinent part, that in  
3 any order issued in resolution of a disciplinary proceeding  
4 before the bureau, the commissioner may request the  
5 administrative law judge to direct a licensee found to have  
6 committed a violation of this part to pay a sum not to exceed the  
7 reasonable costs of the investigation and enforcement of the  
8 case.

9 WHEREFORE, Complainant prays that a hearing be  
10 conducted on the allegations of this Accusation and that upon  
11 proof thereof, a decision be rendered imposing disciplinary  
12 action against all licenses and license rights of Respondents  
13 GRAY WOLF TRANSFERS, INC., and CHARLES ANTHONY BENNETT  
14 individually and as designated officer of Gray Wolf Transfers,  
15 Inc. under the Real Estate Law (Part 1 of Division 4 of the  
16 Business and Professions Code), for the cost of investigation and  
17 enforcement as permitted by law, and for such other and further  
18 relief as may be proper under other applicable provisions of law.

19 Dated at Los Angeles, California

20 this 11<sup>th</sup> day of August, 2015.

21   
22 \_\_\_\_\_  
23 MARIA SUAREZ  
Supervising Special Investigator

24 cc: Gray Wolf Transfers, Inc.  
25 Charles Anthony Bennett  
26 Maria Suarez  
27 Sacto.

Accusation of Gray Wolf Transfers, Inc.