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FILED
AUG 30 2018
DEPARTMENT OF REAL ESTATE
By *[Signature]*

8
9 **BEFORE THE DEPARTMENT OF REAL ESTATE**
10 **STATE OF CALIFORNIA**

11 * * *

12 In the Matter of the Accusation against) No. H-41150 LA
13)
14 EQUITYMINE,)
15) ACCUSATION
16 Respondents.)
17)

18 Complainant, Chika Sunquist, a Supervising Special Investigator of the State of
19 California (“Complainant”), for cause of Accusation against EQUITYMINE, formerly known
20 as First Capital Consulting, (“Respondent”), alleges as follows:

21 1.

22 Complainant makes this Accusation in her official capacity.

23 2.

24 All references to the “Code” are to the Real Estate Law, part 1 of division 4 of
25 the California Business and Professions Code and all references to “Regulations” are to title 10,
26 chapter 6, of the California Code of Regulations.

27 3.

a. Respondent is a California corporation (File No. C3445615).

1 530.5, subdivision (a) (identity theft), a misdemeanor, and Penal Code section 487, subdivision
2 (a) (grand theft), a misdemeanor.

3 7.

4 On or about January 12, 2010, in the Superior Court of California, County of
5 Los Angeles, Case No. 9GN04614, Abramyan was convicted of violating Vehicle Code section
6 12500, subdivision (a) (driving without a valid license), a misdemeanor.

7 8.

8 Pursuant to Regulation 2910, the convictions described in Paragraphs 6 and 7
9 bear a substantial relationship to the qualifications, functions, or duties of a real estate licensee.

10 9.

11 The matters alleged in Paragraphs 4 through 8 constitute cause for suspension or
12 revocation of Respondent's license and license rights of Respondent under Code section 10177,
13 subdivision (a).

14 MLO LICENSE ENDORSEMENT

15 10.

16 On or about August 21, 2017, Respondent made application to the Department
17 in a MU1 form seeking a mortgage loan originator ("MLO") license endorsement under NMLS
18 identification number 1661194. Within the section entitled "Direct Owners and Executive
19 Officers," Respondent failed to disclose Abramyan's role as Secretary and Chief Financial
20 Officer of Equitymine.

21 11.

22 On or about November 7, 2017, Respondent made application for a MLO license
23 endorsement renewal on the NMLS system under identification number 1661194. Within the
24 section entitled "Direct Owners and Executive Officers," Respondent failed to disclose
25 Abramyan's role as Secretary and Chief Financial Officer of Equitymine.

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12.

The matters alleged in Paragraphs 10 and 11 above constitute cause for suspension of, revocation of, or conditions upon Respondent's MLO license endorsement under Code section 10166.051, subdivision (b), in that Respondent withheld information and/or made material misstatements in applications for license endorsements and license endorsement renewals.

COSTS


(INVESTIGATION AND ENFORCEMENT COSTS)

13.

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 investigation and enforcement of the case.

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 the licenses, license rights, and license endorsements of Respondent under the Real Estate Law, for the costs 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 Sacramento, California this 22nd day of August, 2018.


Chika Sunquist
Supervising Special Investigator

cc: Chika Sunquist
Sacto.