

1 LISSETE GARCIA, Counsel (SBN 211552)
Department of Real Estate
2 320 West 4th Street, Suite 350
Los Angeles, California 90013-1105
3 Telephone: (213) 576-6982
Direct: (213) 576-6914
4 Fax: (213) 576-6917
Attorney for Department of Real Estate

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DEPT. OF REAL ESTATE
By 

8 BEFORE THE DEPARTMENT OF REAL ESTATE
9 STATE OF CALIFORNIA

10 * * *

11 In the Matter of the Accusation against

DRE No. H-42103 LA

12 BE COMMERCIAL REAL ESTATE, INC. and
13 STACY LA VANCE MEADOWS, individually and as
former designated officer for BE Commercial Real
14 Estate, Inc.,

ACCUSATION

15 Respondents.

16 The Complainant, Maria Suarez, a Supervising Special Investigator for the Department
17 of Real Estate¹ (“Department”) of the State of California, makes this Accusation in her official
18 capacity for cause of Accusation against BE COMMERCIAL REAL ESTATE, INC. and
19 STACY LA VANCE MEADOWS, individually and as former designated officer for BE
20 Commercial Real Estate, Inc. (collectively “Respondents”), is informed and alleges as follows:

21 1. All references to the “Code” are to the California Business and Professions Code
22 and all references to “Regulations” are to the Regulations of the Real Estate Commissioner,
23

24 ¹ Between July 1, 2013 and July 1, 2018, the Department of Real Estate operated as the Bureau of Real Estate under the Department of Consumer Affairs.

1 Title 10, Chapter 6, California Code of Regulations.

2 2. Respondents are licensed and/or have license rights under the Real Estate Law
3 (Part 1 of Division 4 of the California Business and Professions Code).

4 Statement of Facts

5 Licenses

6 3. On April 14, 2016, the Department issued a real estate corporation license to
7 Respondent BE COMMERCIAL REAL ESTATE, INC. ("BECREI"), License ID 01998339.

8 4. Respondent BECREI's license expired on April 13, 2020. Respondent BECREI
9 has renewal rights pursuant to Code section 10201. The Department retains jurisdiction
10 pursuant to Code section 10103.

11 5. On or about November 13, 1981, the Department issued a real estate broker
12 license to L T BUTLER ("Butler"), License ID 00561437.

13 6. Butler is deceased. Butler passed away on April 4, 2019.

14 7. On April 7, 2008, the Department issued a real estate broker license to
15 Respondent STACY LA VANCE MEADOWS ("MEADOWS"), License ID 01185059.

16 8. From April 14, 2016, through April 13, 2020, Respondent BECREI was licensed
17 by the Department as a corporate real estate broker, by and through Respondent MEADOWS,
18 as designated officer-broker of Respondent BECREI to qualify said corporation and to act for
19 said corporation as a real estate broker.

20 9. From April 14, 2016, through April 13, 2020, MEADOWS was the designated
21 officer-broker for Respondent BECREI, pursuant to section 10211 of the Code. As said
22 designated officer-broker, MEADOWS was, at all times mentioned herein, responsible pursuant
23 to Section 10159.2 of the Code for the supervision of the activities of the officers, agents, real
24 estate licensees, and employees of Respondent BECREI for which a license is required.

1 10. Whenever reference is made in an allegation in this Accusation to an act or
2 omission of Respondent BECREI, such allegation shall be deemed to mean that the officers,
3 directors, employees, agents and/or real estate licensees employed by or associated with
4 Respondent BECREI committed such act or omission while engaged in the furtherance of the
5 business or operations of such corporate respondent and while acting within the course and
6 scope of their authority and employment.

7 Prior Discipline

8 11. On or about August 5, 1998, the Department filed an Accusation against Butler
9 in Department Case No. H-27777 LA. On January 25, 1999, the Department revoked Butler's
10 real estate broker license in Case No. H-27777 LA.

11 Corporation Status

12 12. BECREI is a corporation formed in California, on or about August 13, 2015,
13 California Corporate Number C3816525. According to the California Secretary of State, Butler
14 was the sole officer and director of BECREI.

15 13. On January 2, 2018, the California Franchise Tax Board suspended the entity's
16 powers, rights, and privileges pursuant to the provisions of the California Revenue and Taxation
17 Code. BECREI's powers, rights, and privileges remain suspended with the California Secretary
18 of State.

19 In Aggravation

20 14. On December 15, 2015, the Department received a Corporation License
21 Application submitted by MEADOWS on behalf of BECREI. MEADOWS claimed to be the
22 Vice-President for BECREI. In "Section III-Regulation 2746" of BECREI's Corporation
23 License Application, MEADOWS certified that a Corporation Background Statement was not
24 needed for any officers or persons owning or controlling more than ten percent of the

1 corporation shares. MEADOWS failed to provide a Corporation Background Statement for
2 Butler, BECREI's owner and officer, and thereby, MEADOWS failed to disclose the prior
3 revocation of Butler's real estate broker license.

4 15. On or about July 30, 2018, MEADOWS submitted a Corporation Change
5 Application on behalf of BECREI to the Department for change of the corporation's main and
6 mailing address. MEADOWS failed to notify the Department of the suspension of BECREI's
7 corporation status with the California Secretary of State.

8 16. The Department received a complaint from W.C. and M.C.² concerning the
9 purchase of real property located at 27400 Tinkers Valley Dr., in Solon, Ohio. The complaint
10 alleged fraud or dishonest dealings by Butler and BECREI in 2017 through 2019. In response
11 to an inquiry from a Special Investigator for the Department regarding the complaint,
12 MEADOWS stated, "L T Butler was the owner of the company. I never knew what [he] was
13 doing with [his] company..." MEADOWS claimed to have no knowledge of the out-of-state
14 transaction.

15 Causes of Accusation

16 17. The suspension of Respondent BECREI is in violation of Regulation 2742,
17 subdivision (c) and constitutes grounds to suspend or revoke Respondent BECREI's corporate
18 real estate broker license pursuant to Code section 10177, subdivisions (d) and/or (g).

19 18. Said corporate suspension would have constituted grounds for the denial of
20 Respondent's corporate real estate broker license under Regulation section 2742 of Chapter 6,
21 Title 10, California Code of Regulations and is now cause to suspend or revoke the license and
22 license rights of Respondent BECREI pursuant to Code section 10177, subdivision (f).

23
24 ² Initials are used in place of individuals' full names to protect their privacy. Documents containing individuals' full names will be provided during the discovery phase of this case to Respondent(s) and/or their attorneys, after service of a timely and proper request for discovery on Complainant's counsel.

1 19. The conduct, acts and/or omissions of Respondent MEADOWS in failing to
2 adequately supervise the activities of Respondent BECREI is in violation of Section 10159.2 of
3 the Code and constitutes grounds to suspend or revoke the license and/or license rights of
4 Respondent MEADOWS pursuant to Code section 10177, subdivisions (h), (d) and/or (g).

5 Investigation and Enforcement Costs

6 20. Code section 10106 provides, in pertinent part, that in any order issued in resolution
7 of a disciplinary proceeding before the Department of Real Estate, the Commissioner may
8 request the administrative law judge to direct a licensee found to have committed a violation of
9 this part to pay a sum not to exceed the reasonable costs of the investigation and enforcement of
10 the case.

11 Statutory Provisions

12 21. Regulation 2742 provides:

13 “Regulation 2742. Certificate of Status, Qualification or Good Standing.

14 (a) An applicant for an original broker license for a domestic corporation shall submit
15 with the application, a Certificate of Status (Domestic Corporation) executed by the California
16 Secretary of State not earlier than 30 days before the date of mailing or delivering the
17 application to the headquarters office of the Bureau. However, if the applicant is a domestic
18 corporation which filed its original Articles of Incorporation not earlier than six (6) months
19 before the date of mailing or delivering the application to the headquarters office of the Bureau,
20 Articles of Incorporation executed by the California Secretary of State may be submitted instead
21 of a Certificate of Status.

22 (b) An applicant for an original broker license for a foreign corporation shall submit
23 with the application, a Certificate of Qualification or a Certificate of Good Standing (Foreign
24

1 Corporation) executed by the California Secretary of State not earlier than 30 days before the
2 date of mailing or delivering the application to the headquarters office of the Bureau.

3 (c) A corporation licensed under Section 10211 of the Code shall not engage in the
4 business of a real estate broker while not in good legal standing with the Office of the Secretary
5 of State.”

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

12 Dated at San Diego, California this 15TH day of MARCH, 2022.

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15 MARIA SUAREZ
16 Supervising Special Investigator
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18 cc: BE Commercial Real Estate, Inc.
19 Stacy La Vance Meadows
20 Maria Suarez
21 Sacto.
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