

1 Department of Real Estate
2 320 W. 4th Street, Suite 350
3 Los Angeles, CA 90013-1105
4 Telephone: (213) 559-5990

FILED

JAN 14 2026

By- 

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8 **DEPARTMENT OF REAL ESTATE**
9 **STATE OF CALIFORNIA**

10 ***

11 In the Matter of the Accusation of)

DRE No. H-43005 LA

12 HOMEPIE, INC. and SEAN MICHAEL)
13 CROSIER, individually and as designated officer)
of Homepie, Inc.,)

STIPULATION AND AGREEMENT
IN SETTLEMENT AND ORDER

14 Respondent(s).)
15

16 It is hereby stipulated by and between Respondents HOMEPIE, INC. and SEAN
17 MICHAEL CROSIER (collectively "Respondents"), represented by P. Kurt Peterson of Peterson,
18 Martin, & Reynolds, LLP, and the Complainant, acting by and through Kevin H. Sun, Counsel for
19 the Department of Real Estate, as follows for the purpose of settling and disposing of the
20 Accusation filed on January 28, 2025, in Case No. H-43005 LA:

21 1. All issues which were to be contested and all evidence which was to be presented
22 by Complainant and Respondents at a formal hearing on the Accusation, which hearing was to be
23 held in accordance with the provisions of the Administrative Procedure Act ("APA"), shall instead
24 and in place thereof be submitted on the basis of the provisions of this Stipulation and Agreement
25 in Settlement and Order ("Stipulation").

26 2. Respondents have received, read and understand the Statement to Respondents,
27 the Discovery Provisions of the APA and the Accusation filed by the Department of Real Estate in

1 this proceeding.

2 3. On or about February 12, 2025, Respondents filed Notices of Defense pursuant to
3 Section 11506 of the Government Code for the purpose of requesting a hearing on the allegations in
4 the Accusation in Case No. H-43005 LA. Respondents hereby freely and voluntarily withdraw said
5 Notices of Defense. Respondents acknowledge that they understand that by withdrawing said
6 Notices of Defense they will thereby waive their rights to require the Commissioner to prove the
7 allegations in the Accusation at a contested hearing held in accordance with the provisions of the
8 APA and that they will waive other rights afforded to them in connection with the hearing such as
9 the right to present evidence in defense of the allegations in the Accusation and the right to cross-
10 examine witnesses.

11 4. This Stipulation is based on the factual allegations contained in the Accusation.
12 In the interest of expedience and economy, Respondents choose not to contest these allegations, but
13 to remain silent, and understand that, as a result thereof, these factual allegations, without being
14 admitted or denied, will serve as a prima facie basis for the disciplinary action stipulated to herein.
15 The Real Estate Commissioner shall not be required to provide further evidence to prove said
16 factual allegations.

17 5. This Stipulation is made for the purpose of reaching an agreed disposition of this
18 proceeding and is expressly limited to this proceeding and any other proceeding or case in which
19 the Department or another licensing agency of this state, another state, or if the federal government
20 is involved, and otherwise shall not be admissible in any other criminal or civil proceeding.

21 6. It is understood by the parties that the Real Estate Commissioner may adopt the
22 Stipulation as her Decision in this matter, thereby imposing the penalty and sanctions on
23 Respondent's real estate licenses and license rights as set forth in the below "Order". In the event
24 that the Commissioner in her discretion does not adopt the Stipulation and Agreement, it shall be
25 void and of no effect, and Respondent shall retain the right to a hearing and proceeding on the
26 Accusation under all the provisions of the APA and shall not be bound by any admission or waiver
27 made herein.

1 of this Decision and Order. Should such a determination be made, the Commissioner may, in her
2 discretion, vacate and set aside the stay order and reimpose all or a portion of the stayed
3 suspension. Should no such determination be made, the stay imposed herein shall become
4 permanent.

5 II.

6 (SEAN MICHAEL CROSIER)

7 All licenses and licensing rights of Respondent SEAN MICHAEL CROSIER
8 (“CROSIER”) under the Real Estate Law are suspended for a period of **30 days** from the effective
9 date of this Decision and Order; provided, however, that:

10 1. **30 days** of said suspension shall be stayed for two (2) years upon the following
11 terms and conditions:

12 a. Respondent shall obey all laws, rules and regulations governing the rights,
13 duties and responsibilities of a real estate licensee in the State of California; and,

14 b. That no final subsequent determination be made, after hearing or upon
15 stipulation, that cause for disciplinary action occurred within two (2) years from the effective date
16 of this Decision and Order. Should such a determination be made, the Commissioner may, in her
17 discretion, vacate and set aside the stay order and reimpose all or a portion of the stayed
18 suspension. Should no such determination be made, the stay imposed herein shall become
19 permanent.

20 III.

21 (HOMPIE and CROSIER)

22 1. All licenses and licensing rights of Respondent are indefinitely suspended unless
23 or until Respondents pay the sum of **\$4,701.56** (\$2,787.56 for Investigation Costs and \$1,914.00 for
24 Enforcement Costs) for the Commissioner’s reasonable costs of the investigation and enforcement
25 which led to this disciplinary action. Said payment shall be in the form of a cashier’s check made
26 payable to the Department of Real Estate. **The payment for the investigative and enforcement**
27 **costs must be delivered to the Department of Real Estate, Flag Section at 651 Bannon Street,**


1 Suite 504, Sacramento, CA 95811, within six (6) months after the effective date of this
2 **Decision and Order.** If Respondent fail to satisfy this condition, the Commissioner shall order
3 suspension of Respondent's licenses and license rights until the sum is paid.

4 2. Pursuant to Code Sections 10148, Respondents shall pay the Commissioner's
5 reasonable costs for the audit which led to this disciplinary action in the amount of \$6,411.00, or
6 show proof of payment. **The payment for the audit costs must be delivered to the Department**
7 **of Real Estate, Flag Section at 651 Bannan Street, Suite 504, Sacramento, CA 95811, within**
8 **six (6) months after the effective date of this Decision and Order.** If Respondents fail to satisfy
9 this condition in a timely manner as provided for herein, Respondents' real estate licenses shall
10 automatically be suspended until payment is made in full, or until a decision providing otherwise is
11 adopted following a hearing held pursuant to this condition.

12 3. Pursuant to Code section 10148 of the Code, Respondents shall pay the
13 Commissioner's reasonable costs, not to exceed \$8,013.75, for a subsequent audit to determine if
14 Respondents have corrected the violations found in the Determination of Issues. In calculating the
15 amount of the Commissioner's reasonable costs, the Commissioner may use the estimated average
16 hourly salary for all persons performing audits of real estate brokers, and shall include an allocation
17 for travel time to and from the auditor's place of work. Respondents shall pay such costs within
18 sixty (60) days of receiving an invoice therefore from the Commissioner. Payment of the audit
19 costs should not be made until Respondents receive the invoice. If Respondents fail to satisfy this
20 condition in a timely manner as provided for herein, Respondents' real estate licenses shall
21 automatically be suspended until payment is made in full, or until a decision, providing otherwise,
22 is adopted following a hearing held pursuant to this condition.

23
24 DATED:

a/r 6/25

25 
26 Kevin H. Sun, Counsel for
27 Department of Real Estate

1 Respondents' signature below constitutes acceptance and approval of the terms and
2 conditions of this Stipulation. Respondents agree, acknowledge and understand that by signing this
3 Stipulation, Respondents are bound by its terms as of the date of such signatures and that this
4 agreement is not subject to rescission or amendment at a later date except by a separate Decision
5 and Order of the Real Estate Commissioner.

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7 DATED: 9/25/2025

Signed by:
[Redacted]
HOMEPIE, INC.
By: Brad Rice
Respondent

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9
10 DATED: 9/26/2025

DocuSigned by:
[Redacted]
SEAN MICHAEL CROSIER
Respondent

11
12 *I have reviewed this stipulation and agree to its form and content and have
13 advised my clients accordingly.*

14 DATED: 9/26/25

[Redacted]
P. KURT PETERSON, Esq.
Attorney for Respondent
Approved as to Form

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16 * * *

17 The foregoing Stipulation and Agreement is hereby adopted as my Decision as to
18 Respondents HOMEPIE, INC. and SEAN MICHAEL CROSIER in this matter and shall become
19 effective at 12 o'clock noon on FEB 13 2026, 2025.

20
21 IT IS SO ORDERED

1/8/2021

. 2025.

22
23 CHIKA SUNQUIST
24 REAL ESTATE COMMISSIONER
25 [Redacted]
26 By: Marcus L. McCarther
27 Chief Deputy Real Estate Commissioner