

1 Julie L. To (SBN 219482)
2 Department of Real Estate
3 320 West 4th Street, Suite 350
4 Los Angeles, California 90013-1105
5 (213) 559-5990 (office)
6 (213) 443-9264 (direct)
7 julie.to@dre.ca.gov
8 Department of Real Estate Counsel

FILED

MAY 06 2026

DEPT. OF REAL ESTATE

By Zni Ja

10 DEPARTMENT OF REAL ESTATE
11 STATE OF CALIFORNIA

12 * * * * *

13 In the Matter of the Accusation against	)	No. H-43242 LA
	)	
14 CAROLYN STATEN PATTON,	)	<u>ACCUSATION</u>
	)	
15	)	
16 Respondent.	)	
17	)	

18 The Complainant, Ray Dagnino, acting in his official capacity as a Supervising
19 Special Investigator of the State of California, for cause of Accusation against CAROLYN
20 STATEN PATTON (Respondent or PATTON) is informed and alleges as follows:

21 ///

22 ///

24 H-43242 LA: DRE Accusation against Carolyn Staten Patton

1.

All references to the "Code" are to the California Business and Professions Code and all references to "Regulation" or "Regulations" are to Title 10, Chapter 6, California Code of Regulations.

DRE LICENSE HISTORY

2.

According to DRE records to date and publicly accessible online at the DRE's website (https://www2.dre.ca.gov/PublicASP/ppinfo.asp?License_id=01144776), Respondent is presently licensed and/or has license rights under the Real Estate Law (Part 1 of Division 4 of the Code) as a real estate broker) (REB), Department of Real Estate (DRE) license ID 01144776.

3.

According to DRE records to date and publicly accessible online at the aforementioned DRE website described in Paragraph 2, Respondent was originally licensed as a real estate salesperson (RES) on or about August 27, 1992 and as a REB on or about February 13, 2008. Respondent's mailing address of record is 19628 Campaign, Carson, CA 90746.

4.

According to DRE records to date and publicly accessible online at the aforementioned DRE website described in Paragraph 2, Respondent's license is affiliated with eight (8) RES and one (1) DBA for "Dreamworks Realty" (active as of February 13, 2008) and has no history of license discipline.

///

///

H-43242 LA: DRE Accusation against Carolyn Staten Patton

1 5.

2 According to DRE records to date and publicly accessible online at the
3 aforementioned DRE website described in Paragraph 2, Respondent's license will expire on
4 February 12, 2028. Upon license expiration and pursuant to Code Section 10201, Respondent
5 retains renewal rights, and pursuant to Code Section 10103, the DRE retains jurisdiction.

6 6.

7 Earthell Buckner

8 According to DRE records to date and publicly accessible online at the DRE's
9 website (https://www2.dre.ca.gov/PublicASP/pplinfo.asp?License_id=02103159), Earthell
10 Buckner (Buckner) is presently licensed and/or has license rights under the Real Estate Law (Part
11 1 of Division 4 of the Code) as a RES, DRE license ID 02103159.

12 7.

13 According to DRE records to date and publicly accessible online at the
14 aforementioned DRE website described in Paragraph 6, Buckner was originally licensed on or
15 about August 20, 2021.

16 8.

17 According to DRE records to date and publicly accessible online at the
18 aforementioned DRE website described in Paragraph 6, Buckner's license is affiliated with REB
19 Broker Brothers Real Estate Group Inc (DRE license ID 02099862).

20 ///

21 ///

22 ///

23
24 H-43242 LA: DRE Accusation against Carolyn Staten Patton

1 9.

2 According to DRE records to date and publicly accessible online at the
3 aforementioned DRE website described in Paragraph 6, Buckner's responsible broker history is
4 as follows:

- 5 a. Respondent PATTON , from April 27, 2023 to June 4, 2025, and
- 6 b. Broker Brothers Real Estate Group Inc, from August 31, 2021 to April
7 26, 2023.

8 10.

9 According to DRE records to date and publicly accessible online at the
10 aforementioned DRE website described in Paragraph 6, Buckner's license has no history of
11 license discipline and will expire on August 19, 2029. Upon license expiration and pursuant to
12 Code Section 10201, Buckner retains renewal rights, and pursuant to Code Section 10103, the
13 DRE retains jurisdiction.

14 **FACTS DISCOVERED BY THE DEPARTMENT**

15 11.

16 **Complaint Lodged by Property Owner**

17 On or about May 23, 2024, Pamela S. (Property Owner) lodged a complaint
18 (052324 Complaint) with the Department against Respondent and alleged that:
19 Respondent/Dreamworks Realty listed Property Owner's property located at ##### San Vicente
20 Boulevard, Los Angeles, CA 90048 (subject property) for sale (subject listing); that she had
21 never met Respondent; and that she had not signed any listing agreement with Respondent.
22 Property Owner stated in her complaint that she currently lives at the subject property and has no
23

24 H-43242 LA: DRE Accusation against Carolyn Staten Patton
25
26
27

1 intention to sell said property. Specifically, Property Owner's complaint stated: "I have no
2 intention to sell my property. I currently live at this property. Subsequently, the property is
3 listed, via the MLS on all real estate websites as an active listing. I contacted the CLAW MLS
4 on 5/23[corresponding & speaking to Mr. Henry Campos,] and both verbally and in writing,
5 requesting that the listing be removed...I contacted the LA County Assessors office and
6 confirmed that, indeed, my name is still on record as the title holder/ owner of the property. I
7 recently payed [sic] my Property Taxes in full, prior to their normal due date...I do not know
8 Carolyn Patton. I have NO agreements, neither verbal or written with Carolyn Patton..."

9 12.

10 **Property Owner's Declaration**

11 According to Property Owner's Declaration, signed under penalty of perjury on
12 September 9, 2025 (090925 Declaration): "I am the sole owner of my home/property at ##### San
13 Vicente Boulevard...On Wed., 5/22/24, I was alerted by a friend that my home was fraudulently
14 listed for sale, by Carolyn Patton, #01144776/Listing: CLAW #24-394067 I Dream Works
15 Realty. I have never met Carolyn Patton. I have no prior knowledge of Carolyn Patton. I have
16 never spoken to Carolyn Patton. I have not signed any listing agreement with Carolyn Patton.
17 My home is unequivocally NOT for sale. I have no intention to sell my property. I currently live
18 at this property...I AM THE SOLE inhabitant of the property and I OWN this property, (since
19 1998). ...My Property is NOT for sale. I do not know Carolyn Patton. I have NO agreements,
20 neither verbal or written with Carolyn Patton..."

21 ///

22 ///

23
24 H-43242 LA: DRE Accusation against Carolyn Staten Patton

13.

Complaint Lodged by Consumer

On or about June 3, 2024, Ilene K. (Consumer) lodged a complaint (060324 Complaint) with the Department against Respondent and alleged that: the subject listing is a scam and the property is not for sale. Consumer stated that the subject listing was taken down from the MLS after a few days, originally did not include a photograph, but one day later did include a photo; in fact, according to Consumer, her friend who owns the subject property, has her home photo blurred out on Google Earth.

14.

The 060324 Complaint included a printout of the subject listing from ratemyagent.com that included a photograph identified with a "For Sale" sticker, the ##### San Vicente address described by Property Owner in her 052324 Complaint (ratemyagent printout), an asking price of \$1,499,999, and a contact pop-up with Respondent's name, "Dreamworks Realty," a photograph next to Respondent's name, the telephone number 90997348... and a button (link) to click for "Email."

15.

The "About this property" section of the ratemyagent printout includes the statement: "Please note, this is a drive-by only viewing, respecting the privacy of the tenants currently residing in the property..the seller is flexible and welcomes offers, particularly those willing to accept the existing tenants with a discount. Serious inquiries are encouraged to submit offers through the office...Listed by Carolyn Patton from Dreamworks Realty."

///

H-43242 LA: DRE Accusation against Carolyn Staten Patton

16.

According to Consumer's Declaration, signed under penalty of perjury on September 5, 2025 (090525 Declaration): "The home sale listing for [subject property] is a scam. The property is not for sale. I called this broker...The property is not recently inherited as the broker told me. It is lived in by the current owner who has documentation to prove it. No one else has rights to sell the property...She also told me the owners were motivated to sell and would take cash...She claims she has a signed listing agreement...My friend who owns the home..."

17.

Supplemental Complaint Package Lodged by Property Owner

According to supplemental information lodged by the Property Owner on or about June 17, 2024 (061724 supplemental package) to augment her 052324 Complaint, the Property Owner noted that upon her initial notification of the subject listing on May 22, 2023 there was no photograph included in said listing; however, that in some instances online, the subject listing did include a Google "Street View" screenshot attached to the listing, showing a blurred out image of the property, but with a clear image of the property next door. The Property Owner affirmed that her home is entirely "NOT VISIBLE" and blurred by Google for security reasons.

18.

According to the Property Owner, in the latter part of the day on May 23, 2024, the subject listing had changed to include a new photo; said new photo captured the outer wall of the garage on the subject property and an outer door to a courtyard, with a portion of grass landscaping at the front of the property. According to the Property Owner, said new photo was

H-43242 LA: DRE Accusation against Carolyn Staten Patton

1 taken on the morning of May 23, 2023 due to the positioning of moveable items in the image;
2 specifically, the Property Owner noted that the trash cans in the street indicate it was a
3 designated trash pick up day on May 23, 2023. The Property Owner noted that there are no
4 photos published of the actual house on the subject property due to the house being set back from
5 the front of the property, behind a garage and a stucco wall, driveway gate and a courtyard.
6 Additionally, the Property Owner noted that there are no photos of the interior of the subject
7 property inside the gates or of the interior of the house.

8 19.

9 According to the Property Owner, when she initially contacted the CLAW/MLS
10 office telephonically on May 23, 2024 to not only request removal of the subject listing but to
11 also request information regarding whether the MLS a signed listing agreement from REB Patton
12 on file for the subject listing. The MLS representative (Henry C.) responded that the Property
13 Owner had to make her inquiries in writing via email, to which the Property Owner complied.
14 On the same day after submitting her email inquiry to the MLS, the Property Owner viewed the
15 subject listing and noticed the new photo described above in Paragraph 18.

16 20.

17 When the Property Owner called Henry C./MLS again on the same day, Henry C.
18 confirmed that MLS had received the Property Owner's email request of the same day, but that
19 the subject listing would not be removed. According to the Property Owner, within this same
20 call, Henry C./MLS stated that the MLS had no signed listing agreement on file associated with
21 the subject listing, and that MLS would make contact with the agent, who the MLS provides two
22 (2) business days to submit their response.

23
24 H-43242 LA: DRE Accusation against Carolyn Staten Patton
25
26
27

21.

According to the Property Owner, on the following day, May 24, 2023, Henry C./MLS called (052423 MLS call) to inform that PATTON produced a signed listing agreement and the CLAW/MLS would not remove the subject listing. When the Property Owner responded with a reminder that she does not know PATTON and has never signed any document with PATTON or her agents, Henry C. asked, "Who is Earthell Buckner?" and declined to provide the Property Owner with a copy of the referenced signed listing agreement.

22.

According to the Property Owner, upon further inquiry, Henry C. informed her that the agent (Respondent) informed the MLS that an agent in her company (Buckner) is the cousin of the subject property's owner.

23.

According to the Property Owner, she does not know, and is not related to, Buckner.

24.

According to the Property Owner, on June 5, 2024, she initiated contact with the Los Angeles Southwest Association of Realtors (LASAR) to lodge her complaint regarding the subject listing. On the same day, Yolanda W., the LASAR representative called back to inform that the MLS produced to LASAR a copy of the purported property owner's (PPO) California Driver's License (CADL) and a copy of the Docusigned listing agreement.

///

///

H-43242 LA: DRE Accusation against Carolyn Staten Patton

1 25.

2 According to the Property Owner, she has not provided her CADL to anyone to
3 authorize anyone to list her home for sale.

4 26.

5 According to the Property Owner, while she was on the phone with Yolanda
6 W./LASAR on June 5, 2024, she received a call from Henry C./MLS who asked her to send a
7 copy of her CADL, to which she declined, but offered to show her CADL in-person at the MLS
8 office that afternoon.

9 27.

10 According to the Property Owner, upon arrival to the MLS office the same
11 afternoon, she was asked by MLS Compliance representative Michael U. whether her middle
12 name starts with the letter "M," to which she replied yes. Although the MLS would not provide
13 the Property Owner with a copy of the CADL that Respondent produced to the MLS, the MLS
14 did allow the Property Owner to view the license. The Property Owner recalled that the
15 PATTON-produced CADL showed the same first and last name as her name; however the
16 middle name was blurry but for the first initial "M." According to the Property Owner, the
17 middle name, although blurry, appeared to not be long in length and looked "like it could be
18 "Marie" or something like that."

19 28.

20 According to the Property Owner: her middle name is not the [non-lengthy]
21 blurred out middle name that showed on the PATTON-produced CADL; the photograph is not
22 her; and the CADL identification number does not match hers, with the first letter being entirely
23

24 H-43242 LA: DRE Accusation against Carolyn Staten Patton
25
26
27

1 different, and the numbers being entirely different as well. According to the Property Owner,
2 when she asked Michael U. whether the photo on the Patton-produced CADL resembled her, he
3 readily agreed that it did not. The Property Owner showed her own CADL to authenticate that
4 the person appearing before him at the MLS office is the same as the one in her CADL photo;
5 additionally, Michael U. affirmed that the address that appeared on the Property Owner's CADL
6 is the address of the subject listing.

7 29.

8 According to the Property Owner, Michael U./MLS informed her on June 7, 2024
9 that the subject listing had been removed, but that it would take several days for third party
10 websites to remove the listing.

11 30.

12 **Respondent PATTON's Responses to the DRE's Investigation**

13 On or about December 11, 2024, the DRE sent a letter to Respondent requesting
14 information and documents regarding the subject listing and the purported property owner of the
15 subject property, including, but not limited to the transaction file, Multiple Listing Service
16 (MLS) printouts, advertising materials, and current contact information for the purported
17 property owner (seller) (121124 DRE letter). Included in the 121124 DRE letter were specific
18 inquiries, including, but not limited to, the following questions: "1. Why [sic] are your general
19 procedures for listing a property? How do you verify the ownership of your listed property?...3.
20 What was the procedure for listing and selling the subject property? How did you verify the
21 ownership of your listed property? Please provide your statement and any written documents
22 (e.g. Grant Deed, Seller Id, etc) to support your statement...5. How did you communicate with
23

24 H-43242 LA: DRE Accusation against Carolyn Staten Patton
25
26
27

1 the seller during the transaction? Please provide your statement and any written documents (e.g.,
2 email, text, letter, etc.) to support your statement...7. Did you receive any compensation from
3 the seller? Please provide your statement and any written documents (e.g. escrow instruction,
4 proof of payment) to support your statement.)

5 31.

6 According to responsive correspondence dated December 13, 2024 from
7 Respondent (121324 letter) received by the DRE via e-mail, she received a referral from her new
8 agent Buckner, who is a family friend of the PPO; Buckner sought listing assistance from
9 Respondent. According to Respondent, she and Buckner conducted "several calls" with the
10 PPO, who she listed as "Pamela S.," to discuss the property and intentions, during which the
11 PPO informed that the subject property was left to her by a friend who passed away. According
12 to Respondent, "After gathering the necessary details, I proceeded to create the listing agreement
13 and listed the property on the MLS. Within the same week of the property being posted on the
14 MLS, I was informed that a complaint had been lodged with the MLS. Out of an abundance of
15 caution, I promptly removed the listing until the matter could be thoroughly resolved. Following
16 their investigation, the MLS informed me that our Pamela S. was not the legal owner of the
17 property."

18 32.

19 **Respondent's Self-Reported Multi-Step Procedure for Listing a Property**

20 Included with the 121324 letter was Respondent's "Procedures for Listing a
21 Property," which included, among other tasks, "Verifying the Ownership of a Listed Property"
22 and included the following list: "1. Review Public Records (Check property ownership using
23

24 H-43242 LA: DRE Accusation against Carolyn Staten Patton
25
26
27

1 public records, such as county assessor or record databases, to verify the legal owner of the
2 property.) 2. Request Ownership Documentation (Require a copy of the deed, title report, or
3 other legal documentation showing the seller's ownership of the property.) 3. Verify Seller's
4 Identity (Collect a government-issued photo ID from the seller and confirm their identity
5 matches the ownership records.) 4. Consult with the Title Company (Work closely with a title
6 company to confirm that there are no liens, encumbrances, or disputes regarding the property)."

7 33.

8 On or about January 7, 2025, the DRE sent follow-up correspondence via email
9 to Respondent for additional information and to request the documents referenced in, but not
10 attached to, Respondent's 121324 letter regarding the subject listing and the PPO, including, but
11 not limited to, email communications with the PPO, public records, ownership documentation,
12 ID and title company records.

13 34.

14 **Respondent's Verification of the Identity of the Subject Property Seller (PPO)**

15 Attached to responsive correspondence dated January 12, 2025 from Respondent
16 (011225 letter) received by the DRE via e-mail was a copy of the CADL of the PPO. Said
17 CADL showed a first name and last name that is the same as that of the Property Owner;
18 however the middle name on the PPO's CADL showed a different middle name as that of the
19 Property Owner. The address that appears on the PPO's CADL is not the same as that of
20 Property Owner (the address of the subject property).

21 ///

22 ///

23
24 H-43242 LA: DRE Accusation against Carolyn Staten Patton

35.

Respondent's Communications with Buckner and PPO

On or about January 16, 2025, as a follow-up to a telephone conversation between the DRE investigator and Respondent, DRE investigator sent follow-up correspondence via email that requested Respondent to provide the items discussed in said conversation, including, but not limited to email and text messages between Respondent and the PPO; text messages between Respondent and Buckner; and a copy of the deed that Respondent alleged was provided to her by the PPO.

36.

Attached to responsive correspondence dated January 20, 2025 from Respondent (012025 email) received by the DRE via e-mail was a message from Respondent stating, "please see attach information [sic]" and a PDF file containing the following:

- A. A letter addressed "To Whom It May Concern" signed by Buckner on January 20, 2025 in which Buckner indicates, among other things, "I am writing to address a situation May last year involving my cousin, Pamela Starks, who wished to sell her property...confirmed that she is the rightful owner of the property...I communicated to my broker that this was a family member, and I have full confidence in my cousin's intentions..."
- B. A blurry photograph of a "Substitute Secured Property Tax Bill" that is not a full sheet image and not legible aside from the title of the document.
- C. Emails between Respondent, Buckner and the PPO regarding the subject listing between May 19, 2024 and May 24, 2024, including, but not limited to

H-43242 LA: DRE Accusation against Carolyn Staten Patton

1 emails containing attachments such as the Residential Listing Agreement
2 (Authentisign "Signing Complete" email of May 19, 2024) and a Residential
3 Purchase Agreement ("Completed document" email of May 19, 2024).

4 D. Text messages between Respondent, Buckner and the PPO regarding the
5 subject property, including between May 23 [no year is visible on the
6 screenshots], including, but not limited to, a text purportedly from Respondent
7 to the PPO and Buckner on May 24 stating, "I just received a call from The
8 MLS. A Pamela S##### came to The MLS with the police, stating that I had
9 her house listed illegally. I sent them your information to verify. I am putting
10 the listing on hold until this is straightened out."

11 37.

12 **Respondent's Reliance on a 2013 Tax Bill to Verify Ownership of the Subject Property**

13 Attached to responsive correspondence dated January 21, 2025 from Respondent
14 (012125 email) received by the DRE via e-mail was a message from Respondent
15 stating, "Earthell buckner [sic] provided the tax bill on May 16!" and a photograph of a
16 "Substitute Secured Property Tax Bill" showing a print date of December 23, 2013, for the
17 period July 1, 2013 to June 10, 2014.

18 38.

19 On or about January 22, 2025, as a follow-up to Respondent's 012125 email, the
20 DRE investigator asked Respondent, "Did you ask Earthell buckner or your client for a more
21 recent tax bill or other ownership document before you list [sic] the subject property?"
22 Respondent replied on the same day (012225 email) with "I didn't ask, when I pull a profile it
23

24 H-43242 LA: DRE Accusation against Carolyn Staten Patton
25
26
27

1 match [sic]"

2 39.

3 **Respondent's Confirmation of Her Belief in the PPO as the Owner of the Subject Property**

4 On or about July 30, 2025 as a follow-up to Respondent's telephone call with the
5 DRE investigator, the DRE investigator asked Respondent to confirm the following questions
6 and answers that were discussed during said conversation:

- 7 A. Respondent confirmed to the DRE investigator that here client (PPO) stated
8 that she has a Deed of Trust, Individual Grant Deed, and police report.
- 9 B. Respondent met with the PPO on the same day at ##### W. 54th St., Windor
10 Hills, CA 90043
- 11 C. Respondent told the DRE investigator that she asked the PPO for the Deed of
12 Trust or Individual Grant Deed to verify her ownership, but that the PPO
13 refused and claimed that the Property Owner is a fraud, and that she (PPO) is
14 the "real owner" of the subject property.
- 15 D. Respondent told the DRE investigator that she advised the PPO that they
16 could go to the police station together to file a police report, and that she
17 (PPO) could provide the Deed of Trust or Individual Grant Deed to the police
18 to prove her ownership, to which the PPO agreed. However, according to
19 Respondent, the PPO stopped communicating with her the following day.
- 20 E. Respondent told the DRE investigator that she did not feel suspicious or
21 question the PPO regarding the tax bill because the PPO was a family member
22 of her agent (Buckner) and the PPO provided a copy of her driver's license
23

24 H-43242 LA: DRE Accusation against Carolyn Staten Patton

1 with a name that matched the public record.

2 40.

3 On the same day, in response to the DRE investigator's request for confirmation
4 of their telephonic conversation, Respondent sent a reply email, "yes This is correct thank you
5 [sic]"

6 41.

7 **Documents Subpoenaed from Respondent**

8 On or about August 1, 2025, the DRE subpoenaed Respondent for all writings
9 related to the subject listing.

10 42.

11 Attached to responsive correspondence dated August 30, 2025 from Respondent
12 (082025 email) received by the DRE via e-mail was a message from Respondent stating, "Please
13 see attached items and let me know asap you received," and included information [sic]" and a
14 PDF file containing the following:

- 15 A. Digitally signed transaction documents prepared by DreamWorks Realty and
16 signed by Respondent and the PPO between May 19, 2024 and May 31, 2024,
17 including but not limited to the Residential Listing Agreement (RLA) of May
18 19, 2024 and the Cancellation of Listing signed of May 31, 2024.
- 19 B. Digitally signed Independent Contractor Agreement (ICA) signed and dated
20 By Respondent and Buckner on April 29, 2023.
- 21 C. Email correspondence between Respondence and the MLS, including an MLS
22 Fine Assessment Notice dated May 23, 2024 notifying Respondent that the
23

24 H-43242 LA: DRE Accusation against Carolyn Staten Patton

subject listing is violative of the MLS Rules and Regulations.

D. Email correspondence dated June 7, 2024 from the MLS indicating, "After further review, we have determined that your listing has been entered without authorization from the owner of the property..." to which Respondent replied on the same day, "...I was unaware that she wasn't the owner as she presented herself differently..."

43.

APPLICABLE SECTIONS OF THE REAL ESTATE LAW

Responsibility of Corporate Officer in Charge

(Code Section 10159.2)

Pursuant to Code Section 10159.2 *Responsibility of Corporate Officer in Charge*:

"(a) The officer designated by a corporate broker licensee pursuant to Section 10211 shall be responsible for the supervision and control of the activities conducted on behalf of the corporation by its officers and employees as necessary to secure full compliance with the provisions of this division, including the supervision of salespersons licensed to the corporation in the performance of acts for which a real estate license is required.

(b) A corporate broker licensee that has procured additional licenses in accordance with Section 10158 through officers other than the officer designated pursuant to Section 10211 may, by appropriate resolution of its board of directors, assign supervisory responsibility over salespersons licensed to the corporation to its broker officers.

H-43242 LA: DRE Accusation against Carolyn Staten Patton

1 (c) A certified copy of any resolution of the board of directors assigning
2 supervisory responsibility over real estate salespersons licensed to the corporation shall be filed
3 with the Real Estate Commissioner within five days after the adoption or modification thereof.”

4 44.

5 **Broker Supervision**

6 **(Regulation 2725)**

7 Pursuant to Regulation 2725 *Broker Supervision*:

8 “A broker shall exercise reasonable supervision over the activities of his or her
9 salespersons. Reasonable supervision includes, as appropriate, the establishment of policies,
10 rules, procedures and systems to review, oversee, inspect and manage:

11 (a) Transactions requiring a real estate license.

12 (b) Documents which may have a material effect upon the rights or
13 obligations of a party to the transaction.

14 (c) Filing, storage and maintenance of such documents.

15 (d) The handling of trust funds.

16 (e) Advertising of any service for which a license is required.

17 (f) Familiarizing salespersons with the requirements of federal and state laws
18 relating to the prohibition of discrimination.

19 (g) Regular and consistent reports of licensed activities of salespersons.

20 The form and extent of such policies, rules, procedures and systems shall take into consideration
21 the number of salespersons employed and the number and location of branch offices. A broker
22 shall establish a system for monitoring compliance with such policies, rules, procedures and
23

24 H-43242 LA: DRE Accusation against Carolyn Staten Patton

1 systems. A broker may use the services of brokers and salespersons to assist in administering the
2 provisions of this section so long as the broker does not relinquish overall responsibility for
3 supervision of the acts of salespersons licensed to the broker.”

4 45.

5 **Further Grounds for Disciplinary Action**

6 **(Code Section 10177 (selected portions))**

7 Pursuant to Code Section 10177 *Further Grounds for Disciplinary Action*:

8 “The commissioner may suspend or revoke the license of a real estate licensee,
9 delay the renewal of a license of a real estate licensee, or deny the issuance of a license to an
10 applicant, who has done any of the following:

11 . . .

12 (d) Willfully disregarded or violated the Real Estate Law (Part 1 (commencing
13 with Section 10000)) or Chapter 1 (commencing with Section 11000) of Part 2 or the rules and
14 regulations of the commissioner for the administration and enforcement of the Real Estate Law
15 and Chapter 1 (commencing with Section 11000) of Part 2.

16 . . .

17 (g) Demonstrated negligence or incompetence in performing an act for which he
18 or she is required to hold a license:

19 (h) As a broker licensee, failed to exercise reasonable supervision over the
20 activities of that licensee’s salespersons, or, as the officer designated by a corporate broker
21 licensee, failed to exercise reasonable supervision and control of the activities of the corporation
22 for which a real estate license is required...”

23
24
25 H-43242 LA: DRE Accusation against Carolyn Staten Patton

Cost Recovery

(Code Section 10106)

Pursuant to Code Section 10106 *Cost Recovery of Investigations*:

“(a) Except as otherwise provided by law, 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 the investigation and enforcement of the case.

(b) In the case of a disciplined licensee that is a corporation or a partnership, the order may be made against the licensed corporate entity or licensed partnership.

(c) A certified copy of the actual costs, or a good faith estimate of costs where actual costs are not available, signed by the commissioner or the commissioner’s designated representative, shall be prima facie evidence of reasonable costs of investigation and prosecution of the case. The costs shall include the amount of investigative and enforcement costs up to the date of the hearing, including, but not limited to, charges imposed by the Attorney General.

(d) The administrative law judge shall make a proposed finding of the amount of reasonable costs of investigation and prosecution of the case when requested pursuant to subdivision (a). The finding of the administrative law judge with regard to costs shall not be reviewable by the commissioner to increase the cost award. The commissioner may reduce or eliminate the cost award, or remand to the administrative law judge where the proposed decision fails to make a finding on costs requested pursuant to subdivision (a).

1 (e) Where an order for recovery of costs is made and timely payment is not made
2 as directed in the commissioner's decision, the commissioner may enforce the order for
3 repayment in any appropriate court. This right of enforcement shall be in addition to any other
4 rights the commissioner may have as to any licensee to pay costs.

5 (f) In any action for recovery of costs, proof of the commissioner's decision shall
6 be conclusive proof of the validity of the order of payment and the terms for payment.

7 (g) (1) Except as provided in paragraph (2), the department shall not renew or
8 reinstate the license of any licensee who has failed to pay all of the costs ordered under this
9 section.

10 (2) The department may, in its discretion, conditionally renew or reinstate
11 for a maximum of one year the license of any licensee who demonstrates
12 financial hardship and who enters into a formal agreement with the
13 department to reimburse the department within that one-year period for the
14 unpaid costs.

15 (h) All costs recovered under this section shall be considered a reimbursement for
16 costs incurred and shall be deposited in the Real Estate Fund to be available, notwithstanding
17 Section 10451, upon appropriation by the Legislature.

18 (i) Nothing in this section shall preclude the department from including the
19 recovery of the costs of investigation and enforcement of a case in any stipulated settlement."

20 ///

21 ///

22 ///

24 H-43242 LA: DRE Accusation against Carolyn Staten Patton

- 1
- 2
- 3
- 4
- 5
- 6
- 7
- 8
- 9
- 0
- 1
- 2
- 3
- 4
- 5
- 6
- 7
- 8
- 9
- 0
- 1
- 2
- 3
- 4
- 5
- 6
- 7

Complainant re-alleges and incorporates by reference the preceding paragraphs as set forth herein.

Violation of Code Section 10177(d)

48.

49.

Violation of Code Section 10177(g)

In the course of the activities described above, and based on the facts discovered by the Department, as described above, the acts and/or omissions of Respondent **CAROLYN STATEN PATTON** are in violation of **Code Section 10177(g)** and constitute cause for the suspension or revocation of all licenses and license rights of Respondent under the Real Estate Law.

Page 23 of 25

50.

Third Cause for Discipline:

Violation of Code Sections 10159.2 and 10177(h), Regulation 2725

(Failure to Supervise)

In the course of the activities described above, and based on the facts discovered by the Department, as described above, the acts and/or omissions of Respondent **CAROLYN STATEN PATTON** are in violation of **Code Section 10159.2** and **Regulation 2725**, and pursuant to **Code Section 10177(h)** constitute cause for the suspension or revocation of all licenses and license rights of Respondent under the Real Estate Law.

COSTS

51.

Code Section 10106 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.

///

///

///

///

///

///

///

H-43242 LA: DRE Accusation against Carolyn Staten Patton

1 WHEREFORE, Complainant prays that a hearing be conducted on the allegations
2 of this Accusation and that upon proof thereof, a decision be rendered imposing disciplinary
3 action against all the licenses and license rights of Respondents **CAROLYN STATEN**
4 **PATTON** under the Real Estate Law (Part 1 of Division 4 of the Business and Professions
5 Code), and for such other and further relief as may be proper under other applicable provisions
6 of law.

7 Dated at Los Angeles, California: May 6, 2026

8
9 
10 _____
Ray Dagnino
Supervising Special Investigator

11
12 cc: Carolyn Staten Patton
13 R. Dagnino
Sacramento D.O.

14
15
16
17
18
19
20
21
22
23
24 _____
H-43242 LA: DRE Accusation against Carolyn Staten Patton