

1 CHERYL D. KEILY SBN# 94008  
2 Department of Real Estate  
3 320 West 4th Street, Suite 350  
4 Los Angeles, California 90013-1105

5 Telephone: (213) 576-6982  
6 (Direct) (213) 576-6905

**FILED**

OCT 22 2009

DEPARTMENT OF REAL ESTATE

BY: 

7  
8  
9 BEFORE THE DEPARTMENT OF REAL ESTATE

10 STATE OF CALIFORNIA

11 \* \* \*

12 In the Matter of the Accusation of ) No. H-36315 LA  
13 CHRISTOPHER DALE CAMPBELL, ) A C C U S A T I O N  
14 Respondent. )  
15 \_\_\_\_\_ )

16 The Complainant, Robin Trujillo, a Deputy Real Estate  
17 Commissioner of the State of California, for cause of Accusation  
18 against CHRISTOPHER DALE CAMPBELL ("Respondent") is informed and  
19 alleges as follows:

20 1.

21 The Complainant, Robin Trujillo, a Deputy Real Estate  
22 Commissioner of the State of California, makes this Accusation  
23 in her official capacity.  
24

25 ///

26 ///

27 ///

2.

1 Respondent is presently licensed and/or has  
2 license rights under the Real Estate Law as a real estate  
3 salesperson.  
4

3.

5  
6 At all times herein mentioned, CAMPBELL engaged in the  
7 business of, acted in the capacity of, or advertised a loan  
8 modification service and advance fee brokerage offering to  
9 perform and performing loan modification and negotiation  
10 services with respect to loans which were secured by liens on  
11 real property for compensation or in expectation of compensation  
12 and for fees often collected in advance as well as at the  
13 conclusion of the transaction.  
14

4.

15 On or about December 3, 2008, Christopher Timothy paid  
16 an advance fee of \$3,500 to Respondent and Lionstar Financial  
17 LLC. The advance fee was collected pursuant to a written  
18 agreement pertaining to loan negotiation and modification  
19 services to be provided with respect to a loan secured by the  
20 real property located at 13812 Heidi Circle, Garden Grove,  
21 California 92842.  
22

5.

23  
24 The activities described in Paragraphs 3 and 4, above,  
25 require a real estate broker license under Sections 10131(d) and  
26 10131.2 of the Code.  
27

///

6.

1 Respondent performed and/or participated in loan  
2 solicitation, negotiation and modification activities which  
3 require a real estate broker license under the provisions of  
4 Code Section 10131(d) when Respondent was not licensed by the  
5 Department as a real estate broker nor employed as a real estate  
6 salesperson by the broker on whose behalf the activities were  
7 performed in violation of Section 10130 of the Code.  
8

9 7.

10 The conduct, acts and/or omissions of Respondent, as set  
11 forth, above, violate Code Section 10130, and are cause for the  
12 suspension or revocation of the licenses and license rights of  
13 Respondent pursuant to Code Sections 10177(d), 10177(g) and/or  
14 10177(j).  
15

16 ///

17 ///

18 ///

19 ///

20 ///

21 ///

22 ///

23 ///

24 ///

25 ///

26 ///

27 ///

1                   WHEREFORE, Complainant prays that a hearing be  
2 conducted on the allegations of this Accusation and that upon  
3 proof thereof, a decision be rendered imposing disciplinary  
4 action against all the licenses and license rights of Respondent  
5 CHRISTOPHER DALE CAMPBELL, under the Real Estate Law, and for  
6 such other and further relief as may be proper under other  
7 applicable provisions of law.

8 Dated at Los Angeles, California  
9 this 20 day of October, 2009.

10  
11  
12  
13  
14   
15 Robin Trujillo  
16 Deputy Real Estate Commissioner  
17  
18  
19  
20  
21  
22  
23

24 cc: Christopher Dale Campbell  
25 The Modification Center Inc.  
26 Robin Trujillo  
27 Sacto.