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DEPARTMENT OF REAL ESTATE

By 

8 DEPARTMENT OF REAL ESTATE

9 STATE OF CALIFORNIA

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11	In the Matter of the Accusation of )	No. H-35465 LA
12	THE FIRM-LOANS, INSURANCE, )	<u>A C C U S A T I O N</u>
13	& INVESTMENTS, INC., and )	
14	RICHARD LEON MORRIS, )	
15	individually and as )	
16	designated officer of )	
17	The Firm-Loans, Insurance, )	
18	& Investments, Inc., )	
19	Respondents. )	

18 The Complainant, Robin L. Trujillo, a Deputy Real  
19 Estate Commissioner of the State of California, for cause of  
20 accusation against THE FIRM-LOANS, INSURANCE, & INVESTMENTS,  
21 INC., and RICHARD LOAN MORRIS, individually and as designated  
22 officer of The Firm-Loans, Insurance, & Investments, Inc.,  
23 alleges as follows:

24 1.

25 The Complainant, Robin L. Trujillo, acting in her  
26 official capacity as a Deputy Real Estate Commissioner of the  
27 State of California, makes this Accusation against

1 THE FIRM-LOANS, INSURANCE, & INVESTMENTS, INC., and RICHARD LEON  
2 MORRIS.

3 2.

4 THE FIRM-LOANS, INSURANCE, & INVESTMENTS, INC., and  
5 RICHARD LEON MORRIS, individually and as designated officer of  
6 The Firm-Loans, Insurance, & Investments, Inc. (hereinafter  
7 referred to as "Respondents"), are presently licensed and/or have  
8 license rights under the Real Estate Law (Part 1 of Division 4 of  
9 the Business and Professions Code, hereinafter Code).

10 3.

11 Respondent THE FIRM-LOANS, INSURANCE, & INVESTMENTS,  
12 INC., was originally licensed as a real estate broker on  
13 April 5, 2007. Pursuant to Code Section 10159.2, Respondent  
14 RICHARD LEON MORRIS is responsible for the supervision and  
15 control of the activities conducted on behalf of the corporation  
16 by its officers and employees as necessary to secure full  
17 compliance with the provisions of the Real Estate Law, including  
18 the supervision of salespersons licensed to the corporation in  
19 the performance of acts for which a real estate license is  
20 required.

21 4.

22 At all times material herein, Respondents engaged in  
23 the business of, acted in the capacity of, advertised or assumed  
24 to act as a real estate broker in the State of California, within  
25 the meaning of Sections 10131(d) and 10131(e) of the Code,  
26 including soliciting borrowers and lenders and negotiating loans  
27 on real property.

1 5.

2 Respondents acted in violation of the Real Estate Law  
3 as follows:

4 (1) Violated Section 10146 of the Code by collecting  
5 advance fees from the public and failing to deposit the fees into  
6 a real estate broker trust account.

7 (2) Violated Section 2970 of the Regulations of the  
8 Real Estate Commissioner (Title 10, Chapter 6, California Code of  
9 Regulations, hereinafter "Regulation") by failing to submit to  
10 the Commissioner not less than ten calendar days before  
11 publication or other use, all materials to be used in  
12 advertising, promoting, soliciting and negotiating an agreement  
13 calling for the payment of an advance fee including the form of  
14 advance fee agreement proposed for use.

15 6.

16 The conduct, acts and/or omissions of Respondents THE  
17 FIRM-LOANS, INSURANCE, & INVESTMENTS, INC., and RICHARD LEON  
18 MORRIS, as alleged above, subject their real estate licenses and  
19 license rights to suspension or revocation pursuant to Section  
20 10177(d) and/or 10177(g) of the Code.

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7.

The conduct, acts and/or omissions of Respondent RICHARD LEON MORRIS in failing to ensure full compliance with the Real Estate Law by Respondent THE FIRM-LOANS, INSURANCE, & INVESTMENTS, INC., are in violation of Section 10159.2 of the Code and subject his real estate licenses and license rights to suspension or revocation pursuant to Sections 10177(d), 10177(g) and/or 10177(h) of the Code.

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 licenses and license rights of Respondents THE FIRM-LOANS, INSURANCE, & INVESTMENTS, INC., and RICHARD LEON MORRIS as designated officer of The Firm-Loans, Insurance, & Investments, Inc., under the Real Estate Law (Part 1 of Division 4 of the Business and Professions Code) and for such other and further relief as may be proper under other applicable provisions of law.

Dated at Los Angeles, California

this 12 day of November, 2008.

  
ROBIN L. TRUJILLO  
Deputy Real Estate Commissioner

cc: The Firm-Loans,  
Ins. & Invtmts. Inc.  
Richard Leon Morris  
Phillip Ihde  
Robin L. Trujillo  
Sacto.