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BEFORE THE DEPARTMENT OF FINANCIAL PROTECTION AND INNOVATION
OF THE STATE OF CALIFORNIA

In the Matter of:

THE COMMISSIONER OF FINANCIAL
PROTECTION AND INNOVATION,

Complainant,

v.

BEVERLY JANE STICKLER,

Respondent.

ACCUSATION IN SUPPORT OF ORDER
BARRING RESPONDENT FROM ANY
POSITION OF EMPLOYMENT,
MANAGEMENT, OR CONTROL OF ANY
ESCROW AGENT

(Fin. Code, § 17423)

The Commissioner of Financial Protection and Innovation (Commissioner) is informed and believes, and based upon such information and belief, alleges and charges Respondent as follows:

I.

Introduction

1. The Commissioner is authorized to administer and enforce the provisions of the California Escrow Law (Escrow Law) (Fin. Code, § 17000 et seq.) and the rules and regulations promulgated in title 10 of the California Code of Regulations (CCR).

2. Under the provisions of Financial Code section 17423, the Commissioner as head

1 of the Department of Financial Protection and Innovation (DFPI) brings this action to bar
2 Beverly Jane Stickler (Respondent) from any position of employment, management, or control of
3 any escrow agent for:

- 4 a. Directing or participating in activities which constitute theft or fraud in
5 connection with escrow transactions and making unauthorized disbursements
6 totaling approximately \$545,464.20, in violation of Financial Code section
7 17414, subdivision (a)(1) and 10 CCR sections 1738, 1738.1 and 1738.2;
- 8 b. Creating a fake escrow file and transferring funds from legitimate escrow files
9 to the fake escrow file to pay herself and other unauthorized payees, in
10 violation of Financial Code section 17414, subdivision (a)(2);
- 11 c. Knowingly or recklessly making material misstatements in escrow books,
12 accounts, files, reports, exhibits, statements, or any other document pertaining
13 to an escrow or escrow affairs, in violation of Financial Code section 17414,
14 subdivision (a)(2);
- 15 d. Improperly transferring funds between escrow accounts without issuing
16 checks and receipts, in violation of 10 CCR section 1740.4; and
- 17 e. Failing to disclose all charges on closing statements, in violation of 10 CCR
18 section 1741.3.

19 II.

20 Factual Background

21 3. Respondent, a former escrow manager at Opus Escrow, Inc. (Opus), ran the day-
22 to-day escrow operations and had control over Opus' trust funds.

23 4. On or about January 9, 2025, the DFPI commenced a special examination of
24 Opus' financials, books and records.

25 Theft, Fraud, Unauthorized Disbursements, Fake Escrow File

26 5. The examination revealed that Respondent, during her employment, had
27 misappropriated approximately \$545,464.20, resulting in a trust fund shortage.

28 6. Beginning in September 2022, Respondent unlawfully issued numerous checks

1 from escrow files to herself and other unauthorized payees, totaling \$96,121.87.

2 7. In January of 2023, Respondent created a fake escrow file (escrow number BJS-
3 6118) (Fake Escrow File).

4 8. Between January 21 and December 27, 2023, Respondent unlawfully transferred
5 funds from approximately five legitimate escrow files into her Fake Escrow File, diverting
6 money intended for the principals' legitimate expenses. Respondent then issued hundreds of
7 checks to: (1) herself totaling \$270,688.73; (2) her personal credit card companies and medical
8 provider totaling \$69,244.82; and (3) other unauthorized payees totaling \$109,408.78.

9 9. As of December 13, 2024, Respondent had disbursed all the funds from the Fake
10 Escrow File to herself and unauthorized payees and had also overdrawn the Fake Escrow File by
11 \$345,412.83.

12 10. Below are a few examples of Respondent's fraudulent activities and unauthorized
13 disbursements:

14 **Escrow Number BJS-510**

15 11. Respondent was the escrow officer processing Escrow Number BJS-510.

16 12. Escrow Number BJS-510 closed on December 27, 2022. It had a balance of
17 \$69,181.00 after closing, which was intended to pay the seller's taxes. The seller's taxes were
18 not paid.

19 13. In January of 2023, Respondent issued five checks from Escrow Number BJS-510
20 to herself totaling \$1,000.00 and unlawfully transferred the remaining \$68,181.00 to the Fake
21 Escrow File.

22 14. Thereafter, Respondent issued numerous checks from the Fake Escrow File to
23 herself and other unauthorized payees.

24 **Escrow Number BJS-6152**

25 15. Respondent was the escrow officer processing Escrow Number BJS-6152.

26 16. Escrow Number BJS-6152 closed on April 4, 2023. It had a balance of
27 \$24,225.75 at closing, which was held to pay the seller's taxes. The seller's taxes were not paid.

28 17. Instead, on December 26, 2023, Respondent unlawfully transferred \$24,225.75 to

1 the Fake Escrow File, from which all funds were disbursed to herself and unauthorized payees.

2 **Escrow Number BJS-500**

3 18. Respondent was the escrow officer processing Escrow Number BJS-500.

4 19. This escrow closed on November 3, 2022. After this escrow closed, Respondent
5 issued a check from Escrow Number BJS-500 to the buyer in the amount \$7,121.02 as a refund,
6 but the buyers never cashed the check.

7 20. On April 24, 2023, Respondent cancelled this check and unlawfully transferred
8 \$7,121.02 to the Fake Escrow File, from which the funds were disbursed to herself and
9 unauthorized payees.

10 **Escrow Number BJS-782**

11 21. Respondent was the escrow officer processing Escrow Number BJS-782.

12 22. On November 29, 2023, a credit was deposited into this escrow in the amount of
13 \$4,143.75, which should have been refunded to the seller.

14 23. Instead, on December 27, 2023, Respondent unlawfully transferred \$4,143.75 to
15 the Fake Escrow File, from which all funds were disbursed to herself and unauthorized payees.

16 **Escrow Number BJS-852**

17 24. Respondent was the escrow officer processing Escrow Number BJS-852, which
18 closed on October 27, 2023.

19 25. Respondent inflated the final closing statement without authorization and
20 misstated the title fee from \$3,032.50 to \$3,290.50, an increase of \$258.00.

21 26. After this escrow closed, on December 27, 2023, Respondent diverted the
22 \$258.00 to the Fake Escrow File and issued checks to herself and other unauthorized payees.

23 **Escrow Number BJS-488**

24 27. Respondent was the escrow officer processing Escrow Number BJS-488.

25 28. On September 21, 2022, Respondent issued a check from this escrow file for
26 \$54,039.00 to pay the sellers' taxes. The next day, Respondent cancelled this check.

27 29. From September 22, 2022 through November 11, 2022, Respondent issued four
28 checks totaling \$54,039.00 from this escrow file to Central Coast Escrow without authorization.

1 30. Respondent previously worked at Central Coast Escrow.

2 **Escrow Number BJS-527**

3 31. Respondent was the escrow officer processing Escrow Number BJS-527, which
4 was closed on January 17, 2023.

5 32. Respondent inflated the final closing statement without authorization and
6 misstated the title fee from \$1,558.00 to \$1,800.00, an increase of \$242.00.

7 33. After this escrow closed, on January 18, 2023, Respondent issued a check to
8 herself in the amount of \$242.00.

9 **Escrow Number BJS-6631**

10 34. Respondent was the escrow officer processing Escrow Number BJS-6631.

11 35. On November 26, 2024 and December 23, 2024, Respondent issued duplicate
12 payments in the amount of \$1,655.95 to an insurance company, when the amount should have
13 only been paid once.

14 36. The second payment to the insurance company was unauthorized and caused a
15 shortage to this escrow.

16 **Escrow Number BJS-6518**

17 37. On August 19, 2024, Escrow Number BJS-6518 closed short because Respondent
18 failed to withhold enough funds to pay the buyers what they were owed based on an interest
19 refund.

20 38. The final closing statement inaccurately omitted a \$210.81 per-diem interest
21 payment made by the lender, and the escrow file lacked the funds to pay the buyers that amount
22 due to all disbursements being completed at closing.

23 **Escrow Number BJS-643**

24 39. Respondent was the escrow officer processing Escrow Number BJS-643.

25 40. On April 28, 2023, following the close of this escrow, Respondent issued an
26 overpayment of \$50,000.00 to a real estate company.

27 41. Although the real estate company returned \$40,000.00, a \$10,000.00 shortage
28 remained in the trust account.

1 waiver of the right to a hearing.

2 (c) Upon receipt of a notice of intention to issue an order pursuant to this
3 section, the person who is the subject of the proposed order is immediately
4 prohibited from engaging in any escrow processing activities, including
5 disbursing any trust funds in the escrow agent's possession, custody or control,
6 and the financial institution holding trust funds shall be so notified by service of
7 the notice, accusation and other administrative pleadings. The prohibition
8 against disbursement of trust funds may be set aside, in whole or in part, by the
9 commissioner for good cause.

10 (e) Persons suspended or barred under this section are prohibited from
11 participating in any business activity of a licensed escrow agent and from
12 engaging in any business activity on the premises where a licensed escrow agent
13 is conducting escrow business. This subdivision shall not be construed to
14 prohibit suspended or barred persons from having their personal escrow
15 transactions processed by a licensed escrow agent.

16 **IV.**

17 **Prayer**

18 Based on the foregoing, the Commissioner finds that Respondent has violated Financial
19 Code section 17414, subdivisions (a)(1) and (a)(2), and 10 CCR sections 1738, 1738.1, 1738.2,
20 1740.4 and 1741.3 by directing or participating in activities which constitute theft or fraud in
21 connection with escrow transactions; making unauthorized disbursements; creating a fake escrow
22 file and transferring funds from other legitimate escrow files to the fake escrow file to pay
23 herself and unauthorized payees; knowingly or recklessly making material misstatements in
24 escrow books, accounts, files, reports, exhibits, statements, or any other document pertaining to
25 an escrow or escrow affairs; improperly transferring funds between escrow accounts without
26 issuing checks and receipts; and failing to disclose all charges on closing statements.

27 It is in the best interest of the public to bar Respondent from any position of employment,
28 management, or control of any escrow agent under section 17423 of the Escrow Law.

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WHEREFORE, IT IS PRAYED THAT, under Financial Code section 17423, Beverly Jane Stickler be barred from any position of employment, management or control of any escrow agent.

Dated: November 6, 2025
San Diego, California

KHALIL MOHSENI
Commissioner of Financial Protection and Innovation

By _____
AFSANEH EGHBALDARI
Senior Counsel
Enforcement Division