

1 MARY ANN SMITH  
Deputy Commissioner  
2 SEAN ROONEY  
Assistant Chief Counsel  
3 BLAINE A. NOBLETT (SBN 235612)  
Senior Corporations Counsel  
4 320 W. 4th Street, Suite 750  
5 Los Angeles, California 90013-2344  
6 (213) 576-1396 (213) 576-7181 (Fax)  
Attorneys for Complainant  
7

8 BEFORE THE DEPARTMENT OF BUSINESS OVERSIGHT  
9 OF THE STATE OF CALIFORNIA  
10

11 In the Matter of the Accusation of THE )  
CALIFORNIA COMMISSIONER OF )  
12 BUSINESS OVERSIGHT, )

FILE NO. 963-2176

13 Complainant, )

**ORDER BARRING BERNADETTE RENEE  
CAMPOS FROM ANY POSITION OF  
EMPLOYMENT, MANAGEMENT, OR  
CONTROL OF ANY ESCROW AGENT**

14 v. )

15 BERNADETTE RENEE CAMPOS, as an )  
16 individual, )

17 Respondent. )  
18 )  
19 )  
20 )

21 The California Commissioner of Business Oversight (“Commissioner”) finds:

22 A. Respondent Bernadette Renee Campos (“Campos”) was, at all times relevant herein,  
23 an escrow officer and administrative assistant employed by Claremont Escrow, Inc. (“Claremont”).  
24 Campos’ job responsibilities as escrow officer and administrative assistant provided her with access  
25 to Claremont’s dormant (unclaimed) trust checks.

26 B. In December 2012, the Commissioner received an undated letter from Kim Hanson  
27 (“Hanson”), Claremont’s escrow manager, reporting that Campos had misappropriated trust funds.  
28 The trust losses only came to light when a former customer called Hanson to inquire about a check he

1 had received. Hanson reviewed the customer's escrow file and discovered Campos had cancelled the  
2 customer's check and reissued a new check to a party unaffiliated with the escrow transaction.  
3 Claremont immediately conducted an internal audit to establish the extent of trust losses and to  
4 determine the number of escrow files affected by Campos' unauthorized disbursements of trust funds.  
5 Claremont eventually identified all of the impacted files and corrected any trust shortages.

6 C. The Commissioner commenced a special examination of Claremont on October 25,  
7 2012. It was later determined that Campos had knowingly or recklessly caused the disbursal of  
8 \$45,609.65 in trust funds between September 2009 and March 2011 in violation of Financial Code  
9 section 17414, subdivision (a)(1) and California Code of Regulations, title 10, sections 1738 and  
10 1738.2.

11 D. The examination disclosed that between September 2009 and December 2010,  
12 Campos cancelled 29 dormant trust checks totaling \$36,076.91 and then reissued 27 unauthorized  
13 trust checks in the same total amount to her son, Eric Mauro ("Mauro"). In addition, between  
14 September 2009 and March 2011, Campos cancelled eight additional trust checks totaling \$7,944.27  
15 and reissued four unauthorized trust checks in the same total amount to her cousin, Diana Sherman  
16 ("Sherman"). Finally, on September 17, 2009, Campos issued an unauthorized trust check for  
17 \$1,358.47 to Mauro from the remaining balance in escrow file number 95418.

18 E. When Claremont's owner, Raul Cruz ("Cruz"), confronted Campos about the  
19 unauthorized transactions, she confessed to cancelling dormant trust checks and reissuing trust checks  
20 to Mauro. Campos confirmed that Mauro was her son. Campos told Cruz that she did not have a bank  
21 account and relied on her son to cash the trust checks on her behalf. Campos claimed Mauro was  
22 unaware of the unauthorized disbursements, and that she had told him that the Claremont trust checks  
23 were her "commission" checks.

24 F. Campos caused the following unauthorized disbursements of trust funds:

25 1. Unauthorized Disbursement of Trust Account Funds – Escrow No. 62572

26 On September 3, 2009, Campos caused an unauthorized disbursement of trust funds to made  
27 to Mauro in the amount of \$2,158.00, when she cancelled trust check number 9628 and reissued  
28

1 check number 17413 in violation of section 17414, subdivision (a)(1) and CCR sections 1738 and  
2 1738.2.

3 2. Unauthorized Disbursement of Trust Account Funds – Escrow No. 62832

4 On July 27, 2010, Campos caused an unauthorized disbursement of trust funds to be made to  
5 Mauro in the amount of \$1,069.00, when she cancelled trust check number 11664 and reissued check  
6 number 17370 in violation of section 17414, subdivision (a)(1) and CCR sections 1738 and 1738.2.

7 3. Unauthorized Disbursement of Trust Account Funds – Escrow No. 62921

8 On November 3, 2009, Campos caused an unauthorized disbursement of trust funds to be  
9 made to Mauro in the amount of \$1,167.00, when she cancelled trust check number 15045 and  
10 reissued check number 17355 in violation of section 17414, subdivision (a)(1) and CCR sections  
11 1738 and 1738.2.

12 4. Unauthorized Disbursement of Trust Account Funds – Escrow No. 73115

13 On October 1, 2009, Campos caused an unauthorized disbursement of trust funds to be made  
14 to Mauro in the amount of \$890.05, when she cancelled trust check number 13076 and reissued check  
15 number 17354 in violation of section 17414, subdivision (a)(1) and CCR sections 1738 and 1738.2.

16 5. Unauthorized Disbursement of Trust Account Funds – Escrow No. 73508

17 On July 28, 2010, Campos caused an unauthorized disbursement of trust funds to be made to  
18 Mauro in the amount of \$693.00, when she cancelled trust check number 14699 and reissued check  
19 number 17371 in violation of section 17414, subdivision (a)(1) and CCR sections 1738 and 1738.2.

20 6. Unauthorized Disbursement of Trust Account Funds – Escrow No. 73556

21 On November 9, 2009, Campos caused an unauthorized disbursement of trust funds to be  
22 made to Mauro in the amount of \$1,201.93, when she cancelled trust check number 15893 and  
23 reissued check number 17356 in violation of section 17414, subdivision (a)(1) and CCR sections  
24 1738 and 1738.2.

25 7. Unauthorized Disbursement of Trust Account Funds – Escrow No. 73698

26 On February 8, 2010, Campos caused an unauthorized disbursement of trust funds to be made  
27 to Mauro in the amount of \$5,317.00, when she cancelled trust check number 15544 and reissued  
28 check number 17364 in violation of section 17414, subdivision (a)(1) and CCR sections

1 1738 and 1738.2.

2 8. Unauthorized Disbursement of Trust Account Funds – Escrow No. 73698

3 On March 26, 2010, Campos caused an unauthorized disbursement of trust funds to be made  
4 to Mauro in the amount of \$4,602.00, when she cancelled trust check number 15543 and reissued  
5 check number 17365 in violation of section 17414, subdivision (a)(1) and CCR sections 1738 and  
6 1738.2.

7 9. Unauthorized Disbursement of Trust Account Funds – Escrow No. 73698

8 On May 26, 2010, Campos caused an unauthorized disbursement of trust funds to be made to  
9 Mauro in the amount of \$5,532.00, when she cancelled trust check numbers 15539 and 15540 and  
10 reissued check number 17366 in violation of section 17414, subdivision (a)(1) and CCR sections  
11 1738 and 1738.2.

12 10. Unauthorized Disbursement of Trust Account Funds – Escrow No. 73900

13 On December 16, 2009, Campos caused an unauthorized disbursement of trust funds to be  
14 made to Mauro in the amount of \$575.00, when she cancelled trust check number 16089 and reissued  
15 check number 17361 in violation of section 17414, subdivision (a)(1) and CCR sections 1738 and  
16 1738.2.

17 11. Unauthorized Disbursement of Trust Account Funds – Escrow No. 84054

18 On July 9, 2010, Campos caused an unauthorized disbursement of trust funds to be made to  
19 Mauro in the amount of \$740.56, when she cancelled trust check number 16383 and reissued check  
20 number 17367 in violation of section 17414, subdivision (a)(1) and CCR sections 1738 and 1738.2.

21 12. Unauthorized Disbursement of Trust Account Funds – Escrow No. 84465

22 On October 20, 2009, Campos caused an unauthorized disbursement of trust funds to be made  
23 to Mauro in the amount of \$1,216.00, when she cancelled trust check number 20414 and reissued  
24 check number 24131 in violation of section 17414, subdivision (a)(1) and CCR sections 1738 and  
25 1738.2.

26 13. Unauthorized Disbursement of Trust Account Funds – Escrow No. 84837

27 On September 15, 2010, Campos caused an unauthorized disbursement of trust funds to be  
28 made to Mauro in the amount of \$265.82, when she cancelled trust check number 20914 and reissued

1 check number 27654 in violation of section 17414, subdivision (a)(1) and CCR sections 1738 and  
2 1738.2.

3 14. Unauthorized Disbursement of Trust Account Funds – Escrow No. 84951

4 On September 8, 2010, Campos caused an unauthorized disbursement of trust funds to be  
5 made to Mauro in the amount of \$679.25, when she cancelled trust check numbers 21430 and 21431  
6 and reissued check number 27573 in violation of section 17414, subdivision (a)(1) and CCR sections  
7 1738 and 1738.2.

8 15. Unauthorized Disbursement of Trust Account Funds – Escrow No. 95212

9 On October 1, 2010, Campos caused an unauthorized disbursement of trust funds to be made  
10 to Mauro in the amount of \$360.00, when she cancelled trust check number 21838 and reissued check  
11 number 27861 in violation of section 17414, subdivision (a)(1) and CCR sections 1738 and 1738.2.

12 16. Unauthorized Disbursement of Trust Account Funds – Escrow No. 95288

13 On August 10, 2010, Campos caused an unauthorized disbursement of trust funds to be made  
14 to Mauro in the amount of \$1,747.74, when she cancelled trust check number 22948 and reissued  
15 check number 27212 in violation of section 17414, subdivision (a)(1) and CCR sections 1738 and  
16 1738.2.

17 17. Unauthorized Disbursement of Trust Account Funds – Escrow No. 95304

18 On November 23, 2009, Campos caused an unauthorized disbursement of trust funds to be  
19 made to Mauro in the amount of \$548.45, when she cancelled trust check number 22265 and reissued  
20 check number 24490 in violation of section 17414, subdivision (a)(1) and CCR sections 1738 and  
21 1738.2.

22 18. Unauthorized Disbursement of Trust Account Funds – Escrow No. 95327

23 On July 1, 2010, Campos caused an unauthorized disbursement of trust funds to be made to  
24 Mauro in the amount of \$910.79, when she cancelled trust check number 22231 and reissued check  
25 number 26679 in violation of section 17414, subdivision (a)(1) and CCR sections 1738 and 1738.2.

26 19. Unauthorized Disbursement of Trust Account Funds – Escrow No. 95364

27 On October 12, 2010, Campos caused an unauthorized disbursement of trust funds  
28 to be made to Mauro in the amount of \$494.00, when she cancelled trust check number

1 23044 and reissued check number 28017 in violation of section 17414, subdivision (a)(1) and CCR  
2 sections 1738 and 1738.2.

3 20. Unauthorized Disbursement of Trust Account Funds – Escrow No. 95547

4 On December 21, 2009, Campos caused an unauthorized disbursement of trust funds to be  
5 made to Mauro in the amount of \$1,028.00, when she cancelled trust check number 23240 and  
6 reissued check number 24816 in violation of section 17414, subdivision (a)(1) and CCR sections  
7 1738 and 1738.2.

8 21. Unauthorized Disbursement of Trust Account Funds – Escrow No. 95742

9 On September 15, 2010, Campos caused an unauthorized disbursement of trust funds to be  
10 made to Mauro in the amount of \$372.00, when she cancelled trust check number 23444 and reissued  
11 check number 27653 in violation of section 17414, subdivision (a)(1) and CCR sections 1738 and  
12 1738.2.

13 22. Unauthorized Disbursement of Trust Account Funds – Escrow No. 96005

14 On December 10, 2010, Campos caused an unauthorized disbursement of trust funds to be  
15 made to Mauro in the amount of \$519.00, when she cancelled trust check number 26464 and reissued  
16 check number 28766 in violation of section 17414, subdivision (a)(1) and CCR sections 1738 and  
17 1738.2.

18 23. Unauthorized Disbursement of Trust Account Funds – Escrow No. 96102

19 On September 21, 2010, Campos caused an unauthorized disbursement of trust funds to be  
20 made to Mauro in the amount of \$668.11, when she cancelled trust check number 24649 and reissued  
21 check number 27733 in violation of section 17414, subdivision (a)(1) and CCR sections 1738 and  
22 1738.2.

23 24. Unauthorized Disbursement of Trust Account Funds – Escrow No. 96232

24 On December 15, 2010, Campos caused an unauthorized disbursement of trust funds to be  
25 made to Mauro in the amount of \$852.17, when she cancelled trust check number 26779 and reissued  
26 check number 28858 in violation of section 17414, subdivision (a)(1) and CCR sections 1738 and  
27 1738.2.

28 ///

1           25.    Unauthorized Disbursement of Trust Account Funds – Escrow No. 96281

2           On November 15, 2010, Campos caused an unauthorized disbursement of trust funds to be  
3 made to Mauro in the amount of \$674.58, when she cancelled trust check number 25445 and reissued  
4 check number 28367 in violation of section 17414, subdivision (a)(1) and CCR sections 1738 and  
5 1738.2.

6           26.    Unauthorized Disbursement of Trust Account Funds – Escrow No. 106445

7           On November 12, 2010, Campos caused an unauthorized disbursement of trust funds to be  
8 made to Mauro in the amount of \$675.00, when she cancelled trust check number 25695 and reissued  
9 check number 28337 in violation of section 17414, subdivision (a)(1) and CCR sections 1738 and  
10 1738.2.

11          27.    Unauthorized Disbursement of Trust Account Funds – Escrow No. 106513

12          On October 21, 2010, Campos caused an unauthorized disbursement of trust funds to be made  
13 to Mauro in the amount of \$1,120.33, when she cancelled trust check number 25874 and reissued  
14 check number 28094 in violation of section 17414, subdivision (a)(1) and CCR sections 1738 and  
15 1738.2.

16          28.    Unauthorized Disbursement of Trust Account Funds – Escrow No. 95418

17          On September 15, 2009, Campos caused an unauthorized disbursement of trust funds to be  
18 made to Mauro in the amount of \$1,538.47, when she issued trust check number 23910 in violation of  
19 section 17414, subdivision (a)(1) and CCR sections 1738 and 1738.2.

20          29.    Unauthorized Disbursement of Trust Account Funds – Escrow No. 62516

21          On January 25, 2010, Campos caused an unauthorized disbursement of trust funds to be made  
22 to Sherman in the amount of \$1,440.27, when she cancelled trust check number 9812 and reissued  
23 check number 17362 in violation of section 17414, subdivision (a)(1) and CCR sections 1738 and  
24 1738.2.

25          30.    Unauthorized Disbursement of Trust Account Funds – Escrow No. 73698

26          On March 14, 2011, Campos caused an unauthorized disbursement of trust funds to be made  
27 to Sherman in the amount of \$4,022.00, when she cancelled trust check numbers 15542 and 15545  
28 and reissued check number 29665 in violation of section 17414, subdivision (a)(1) and

1 CCR sections 1738 and 1738.2.

2 31. Unauthorized Disbursement of Trust Account Funds – Escrow No. 73906

3 On December 1, 2009, Campos caused an unauthorized disbursement of trust funds to be  
4 made to Sherman in the amount of \$1,491.00, when she cancelled trust check numbers 16073, 16074,  
5 and 16075 and reissued check number 17362 in violation of section  
6 17414, subdivision (a)(1) and CCR sections 1738 and 1738.2.

7 32. Unauthorized Disbursement of Trust Account Funds – Escrow No. 84727

8 On October 5, 2009, Campos caused an unauthorized disbursement of trust funds to be made  
9 to Sherman in the amount of \$1,041.00, when she cancelled trust check numbers 20847 and 20848  
10 and reissued check number 24076 in violation of section 17414, subdivision (a)(1) and CCR sections  
11 1738 and 1738.2.

12 G. Making unauthorized disbursements of trust funds constitute grounds, under Financial  
13 Code section 17423, to bar a person from any position of employment, management, or control of  
14 any escrow agent.

15 ///

16 ///

17 ///

18

19

20

21

22

23

24

25

26

27

28



1 H. On August 14, 2014, the Commissioner issued a Notice of Intention to Issue Order  
2 Pursuant to Financial Code section 17423 (Bar From Employment, Management, or Control),  
3 Accusation, and accompanying documents against Campos based upon the above findings, and the  
4 Commissioner personally served Campos with her pleadings on September 2, 2014. The  
5 Commissioner has not received a request for hearing from Campos and the time to request  
6 a hearing expired on September 17, 2014.

7 NOW GOOD CAUSE APPEARING THEREFORE, it is hereby ordered that Respondent  
8 Bernadette Renee Campos is barred from any position of employment, management, or control of  
9 any escrow agent.

10 Dated: September 29, 2014  
11 Los Angeles, California

JAN LYNN OWEN  
Commissioner of Business Oversight

12  
13 By: \_\_\_\_\_  
14 MARY ANN SMITH  
15 Deputy Commissioner  
16 Enforcement Division  
17  
18  
19  
20  
21  
22  
23  
24  
25  
26  
27  
28