

1 PRESTON DuFAUCHARD  
California Corporations Commissioner  
2 ALAN S. WEINGER  
Deputy Commissioner  
3 JUDY L. HARTLEY (CA BAR NO. 110628)  
Senior Corporations Counsel  
4 Department of Corporations  
320 West 4<sup>th</sup> Street, Ste. 750  
5 Los Angeles, California 90013-2344  
Telephone: (213) 576-7604 Fax: (213) 576-7181  
6 Attorneys for Complainant  
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8 BEFORE THE DEPARTMENT OF CORPORATIONS  
9 OF THE STATE OF CALIFORNIA

10  
11 In the Matter of the Petition for Reinstatement ) File No.: 963-1930  
of: )  
12 ) ORDER DENYING PETITION FOR  
13 SUSAN D. DAVIS ) REINSTATEMENT  
14 )  
15 )  
16 )

17 TO: KAMALA D. HARRIS  
ATTORNEY GENERAL, STATE OF CALIFORNIA  
18 Department of Justice  
19 P.O. Box 944255  
Sacramento, California 94244-2550  
20  
21 Susan D. Davis  
P.O. Box 6058  
22 Huntington Beach, California 92615-6058

23 Petitioner, Susan D. Davis, having filed a petition for reinstatement regarding the January 14,  
24 2003 order barring Petitioner from any position of employment, management or control of an escrow  
25 agent issued in proceedings brought by the California Corporations entitled In the Matter of the  
26 Statement of Issues/Accusation of the California Corporations Commissioner v. Susan D. Davis; the  
27 petition, further arguments and letters of recommendation filed by Petitioner in addition to her June  
28 23, 2011 petition letter having been considered, this agency finds that:

1           Petitioner is not entitled to reinstatement of employment, management or control of an  
2 escrow agent for the following reasons:

3           1.       Petitioner still refuses to accept full responsibility for the violations that occurred  
4 while she was employed as the escrow manager and an escrow officer at NLCS Escrow Services,  
5 Inc. Petitioner does finally accept some responsibility for the violations, but only in so far as she  
6 accepts responsibility by virtue of her position as the escrow manager and escrow officer, but  
7 continues to deny that she actually committed the violations. The findings of the Administrative  
8 Law Judge after a trial were that Petitioner committed escrow law violations involving unlicensed  
9 activity, failing to timely or even record deeds of trust, and closing escrows short.

10          2.       Petitioner submitted numerous newspaper articles and administrative documents from  
11 the State of Minnesota, Department of Commerce and the North Dakota Department of Insurance  
12 concerning prosecutions of Trent Jonas; an attorney who was acting as the title agent in the escrows  
13 that were the subject of the Department’s bar action against Petitioner, for failure to record deeds of  
14 trust in title matters he was handling. Notwithstanding, a review of the administrative record before  
15 the California Department of Corporations disclosed that original signed deeds of trust were still in  
16 the escrow files in several of the escrows that were the subject of the Department’s action against  
17 Petitioner. Accordingly, Trent Jonas could not have been responsible for those failures to record.  
18 Moreover, testimony at the administrative trial revealed that Petitioner had used Trent Jonas as the  
19 title agent at her prior job at Center Point Mortgage.

20          3.       Petitioner has submitted no evidence of any educational training despite indicating  
21 that she would be submitting evidence of same in this matter. Petitioner has also offered no proof of  
22 rehabilitation.

23          4.       Finally, Petitioner has submitted nine letters in support of her request for  
24 reinstatement. However, only two of the letters are signed, the signatures are not original signatures,  
25 and only one of the letters is on the company letterhead of the respective person allegedly  
26 recommending Petitioner. Accordingly, no weight can be given to these “letters of  
27 recommendation”.

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WHEREFORE, IT IS ORDERED that the Petition be denied.

Dated: September 26, 2011  
Los Angeles, California

PRESTON DuFAUCHARD  
California Corporations Commissioner

By \_\_\_\_\_  
Alan S. Weinger  
Deputy Commissioner